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S30	Porirua City Council
S134	Powerco Limited
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S64	Rachel Bolstad
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S87	Roger O'Brien Mangaroa Peatland Focus Group
S165	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)
S72	Rozalie Brown
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S162	Winstone Aggregates
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Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S29 Aggregate and Quarry Association (AQA)					
S29.001	Chapter 3.9: Regional form, design and function	Issue 2: Sporadic, uncontrolled and/or uncoordinated development	Support	It is essential that access to potential aggregate resources is not shut off. Aggregate extraction is a locationally constrained activity. It can only occur where suitable aggregate resource exists. Council planning must identify where the rock is located and protect those areas from such development and alternative land uses.	Retained as notified, in particular the subclause (b)
S29.002	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support	Given quarrying is included in the definition of Primary Production in the National Planning Standards. It is very important because even more so than other primary production activities, aggregate is a locationally constrained resource, as discussed above. For this reason, it is important that access to potential aggregate resources is not shut off by other development and alternative land uses or reverse sensitivity. Due to its weight and volume, aggregate is very expensive to transport which reinforces the case for council planning to identify where the rock is located and protect those areas from other uses. Quarries need to be able to operate in close proximity to urban populations because transport is the big cost in each truckload of delivered aggregate, rock or sand.	Retain as notified, in particular the subclause (a)
S29.003	Chapter 3.1A: Climate change	General comments - climate change	Support in part	An important part of RPS Change 1 is addressing issues related to climate change.	RPS to continue addressing issues related to climate change and noting the importance of aggregates in this chapter.
S29.004	Chapter 3.1A: Climate change	Climate change introductory text	Not Stated / Neutral	<p>An important part of RPS Change 1 is addressing issues related to climate change. It should be noted, aggregate is an essential resource for climate change adaptation.</p> <p>Aggregates are needed to make infrastructure more resilient to resist extreme weather events. They will be required to build the structures that will protect against the effects of stronger storms, sea level rise and increased flooding on our infrastructure, including sea walls. They will also be at the fore in fixing damage as well as relocation and rebuild of infrastructure and housing. It should also be noted that sand, limestone and aggregates are an essential ingredient in cement and concrete manufacture.</p> <p>Drought will not only impact on water supply, as specified on</p>	N/A

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				page 30. The resulting reduction in river flows will reduce the quality and quantity of aggregate deposits in rivers. The reduced aggregate from this source means there will be more pressure on hard rock, land based, aggregate sources.	
S29.005	General comments	General comments - overall	Support in part	Under the existing NPS-FM, mineral and aggregate extraction is prohibited on land deemed to be natural wetlands, the definition of which is very broad. The Government is taking steps to amend this with a revised definition and by introducing a consent pathway for minerals and aggregates.	RPS Change 1 not to be finalized before the release of revised NPS-FM.
S29.006	General comments	General comments - overall	Support	The NPS Highly Productive Land has recently been released and the NPS-Indigenous Biodiversity is to be released later in the year. Both statements recognise the significance of aggregate extraction.	The RPS should be consistent with the existing and upcoming NPS.

S73 Alicia Hall

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S73 Alicia Hall					
S73.001	General comments	General comments - overall	Support	As a parent and resident of Pōneke Wellington I fully support the proposed Regional Policy Statement. I support GWRC to make decisions and policies that benefit the wellbeing and health of all communities, all people and to enrich and enhance our biodiversity and environment. Being good ancestors for our tamariki.	Retain as notified.
S73.002	Chapter 3.1A: Climate change	General comments - climate change	Support	Supports the provisions recommended for maintaining and strengthening regional emissions reduction target including 50% reduction by 2030 and net zero by 2050 to stay within 1.5 degrees of warming. I would like to see bold leadership on the GWRC to lead the way in making climate friendly policies and solutions through a future proofing lens. Applying a climate lens to every decision made in these areas is crucial and these decisions and choices must be future proofed. Decisions made today impact generations beyond our own and as current leaders in this space, GWRC has a responsibility to ensure decisions made are in line with the science and in the best interest of ALL in our communities.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S73.003	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	I support maintaining the strong provisions on freshwater, including Te Mana o te Wai, Blue Belt and preventing freshwater pollution.	Retain as notified.
S73.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	I support Councils being empowered and upskilled in implementing good policy and decision making around intensification and limiting the development of urban sprawl/car dependent neighbourhoods. Greenfield projects must show how they do not add to or increase emissions and how they can contribute to emissions reductions through good planning. Maintaining and strengthening the links in the RPS between how we live (urban development) and how we move around (transport) and emissions reduction so that all new projects involved in urban development and transport must show how they will not increase emissions.	Retain as notified.

S80 Anders Crofoot

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S80 Anders Crofoot					
S80.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	General comments - Chapter 3	Oppose	With full review of the RPS scheduled for 2024 and various NPS forthcoming between now and then, it would be better to address changes in light of NPS rather than trying to preempt them. It would also be better to review policies and objectives at the same time.	Delete all proposed amendments to Chapter 3.

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S80.002	Chapter 3.1A: Climate change	General comments - climate change	Oppose	The proposed amendments do not appear to reflect national policies such as a split gas approach. There is much activity in the climate change space on a national level and it would be better to defer changes to the RPS until it can be reviewed in its entirety in 2024.	Delete all amendments to chapter 3.1A, including Issues 1-4.
S80.003	Chapter 3.3: Energy, infrastructure and waste	General comments - energy, infrastructure and waste	Oppose	Issues would be better reviewed in their entirety in the 2024 RPS review.	Delete all proposed amendments including Table 3.
S80.004	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose	Issues would be better reviewed in their entirety in the 2024 RPS review.	Delete all the proposed amendments including all text, objective 12 and Table 4.
S80.005	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Oppose	These issues would be better reviewed in their entirety in the 2024 RPS review when they could be more properly informed by the upcoming NPS for Indigenous Biodiversity.	Delete all the proposed amendments to Chapter 3.6 including text, issues, objectives and table.
S80.006	General comments	General comments - overall	Oppose	I wish to support the submission of Wairarapa Federated Farmers. The Wairarapa Federated Farmers submission goes into much greater detail than my submission and I am in broad agreement with it.	Support the submission of Wairarapa Federated Farmers.

81 Anne Nelson

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S81 Anne Nelson					
S81.001	Chapter 3.1A: Climate change	Issue 2: Climate change and the decline of ecosystem health and biodiversity	Support	Support the new objective to ensure that nature-based solutions are an integral part of climate change responses. Permanent natives, restored wetlands, some tree crops, some arable and some pastoral is a mix that can help reduce agricultural emissions, sequester carbon and enhance biodiversity restoration.	Retain as notified.

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		are inseparably intertwined			

S131 Ātiawa ki Whakarongotai Charitable Trust

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S131 Ātiawa ki Whakarongotai Charitable Trust					
S131.001	General comments	General comments - overall	Support in part	In principle Ātiawa supports the overall intent of the RPS Change 1, to address significant and urgent resource management issues (climate change, indigenous biodiversity, freshwater and urban development). However, there are further amendments required to provide for Ātiawa ki Whakarongotai values and role as mana whenua.	Amend RPS Change 1 to provide for Ātiawa ki Whakarongotai values and role as mana whenua.
S131.002	General comments	General comments - overall	Support	Ātiawa supports an integrated approach to resource management. The concept of integrated management aligns with te tirohanga Māori/Māori worldview of understanding te ao Tūroa, the natural world as an interconnected, interdependent whole. These provisions enable mana whenua values and provide for our mātauranga to be applied to resource management.	Retain as notified.
S131.003	Chapter 3.1A: Climate change	General comments - climate change	Support in part	Many western approaches and concepts to address climate change are founded upon indigenous knowledge, including mātauranga Māori, which Māori have affirmed for generations. Mātauranga Māori and indigenous knowledge are critical to informing resource management issues that the natural world faces today.	Ātiawa supports the intent of the provisions that recognise and address the impacts of climate change on the environment. Ātiawa are pleased that this chapter recognises te ao Māori and mātauranga Māori.
S131.004	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Ātiawa notes that Regional Council have earlier signalled that RPS Change 1 will include limited provisions to that give effect in part to the National Policy Statement for Freshwater Management 2020 (the NPS-FM); a separate freshwater plan change process will be publicly notified by Regional Councils on, or prior to 31 December 2024, to fully give effect to the requirements of the NPS-FM.	Ātiawa are concerned at the interim effect of RPS Change 1 where proposed provisions are dependent on other provisions that are yet to be determined through a freshwater plan change process. For example, Policy 18 and Policy 41 relate to managing freshwater in a way that achieves 'target attribute states for water bodies and freshwater ecosystems'. However, target attribute states for the Kāpiti rohe will not be set until the freshwater plan change process and Te Whaitua o Kāpiti are completed, Te Whaitua o Kāpiti will formally commence in November/December 2022.
S131.005	Chapter 3.6: Indigenous	General comments - indigenous ecosystems	Support in part	In principle Ātiawa support the intent of the provisions to address the degradation of indigenous ecosystems and habitats. Ātiawa is pleased that Regional Council is taking steps to better provide for mana whenua through including	Ātiawa seeks further reference to mana whenua values and their relationship with their culture, land, water, sites, wāhi tapu and other taonga and to partner with regional and district council in the process to identify and schedule indigenous ecosystems and

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	ecosystems			reference to mātauranga Māori, mahinga kai values, and generally improving provision for mana whenua involvement in resource management.	habitats.
S131.006	Chapter 3.9: Regional form, design and function	General comments - urban development	Not Stated / Neutral	The development of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 and the National Policy Statement on Urban Development 2020, and the timeframes provided for their incorporation into the GWRC RPS do not uphold the guarantee of tino rangatiratanga. Ātiawa therefore have fundamental concerns with the process and direction given by the Government requiring this Proposed Regional Policy Statement Change 1. This means that Ātiawa has had inadequate opportunities and insufficient time to contribute to the development of the RPS Change 1. This process and the intensification provisions also prejudice the outcomes and potential outcomes of our Treaty of Waitangi Settlement.	Ātiawa seeks further reference to mana whenua values, as well as addressing the impact of poor urban design on mana whenua and their relationship with the natural world and to provide for our values and role as mana whenua.
S131.007	General comments	General comments - overall	Not Stated / Neutral	<p>Mana whenua have an interest in all parts of te ao Tūroa/the natural world. Ātiawa look forward to strengthening our relationship with Greater Wellington Regional Council.</p> <p>Although Ātiawa is pleased that mātauranga Māori is being given its due recognition by Regional Council, Ātiawa stress that mātauranga Māori and other forms of Māori data must be provided the appropriate protections. This includes, Māori data sovereignty, including but not limited to the way Māori data is stored, protected, accessed, shared, used and analysed. Ātiawa support provisions that seek to develop tikanga and kawa to govern Māori data sovereignty, we look forward to developing tikanga and kawa for data sovereignty for mātauranga-a-Ātiawa ki Whakarongotai.</p>	Ātiawa seek a partnership with Greater Wellington Regional Council across all resource management matters, Ātiawa seeks that Regional Council move beyond thinking that limits mana whenua values to 'cultural' or 'spiritual', this philosophy is out-dated and unfairly restricts mana whenua involvement in resource management and decision-making processes.
S131.008	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	General comments - anticipated environmental results	Not Stated / Neutral	Ātiawa is concerned that the proposed Anticipated Environmental Results (AERs) are so broad that it will not offer meaningful data in terms of monitoring the effectiveness and efficiency of the policies and methods. The AER should be specific and measurable (based on evidence when relevant), and appropriately, time-bound. AER and monitoring is an integral step (and statutory requirement) in the planning cycle (plan-do-monitor-review), and setting robust and meaningful AER produce better data to understand and assess the planning framework.	Ātiawa's position is that mana whenua identity is distinct from the community collective identity. As a result Ātiawa seeks that mana whenua are referred to in their own right. We seek changes to policies that lump together the values of mana whenua and the community.

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S131.009	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	General comments - Chapter 3	Support	In principle, Ātiawa ki Whakarongotai Charitable Trust (Ātiawa) supports the inclusion of these provisions as they set the high-level framework for the proposed changes - that is they set out the issues and rationale for addressing these matters in the Regional Policy Statement.	Specific amendments in relation to the 'Issue' statements are proposed below.
S131.010	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1: Adverse impacts on natural environments and communities	Support	Ātiawa supports Overarching Issue 1. Ātiawa are pleased that the issue references the impact on mana whenua and their relationship with te taiao.	Retain as notified.
S131.011	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Support in part	Ātiawa supports in part Overarching Issue 2. Ātiawa considers that population growth requires additional development capacity, but also exacerbates existing pressures on all aspects of te taiao and its limited resources.	Amend to: 2. Population growth is putting pressure on housing and infrastructure capacity and exacerbates existing pressures on te taiao. To meet the needs of current and future populations, development will place add

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	the objectives in the Regional Policy Statement				
S131.012	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 3: Lack of mana whenua / tangata whenua involvement in decision making	Support	<p>Ātiawa supports Overarching Issue 3. Ātiawa are pleased that this resource management decision making issue has been set out in the regional policy statement. It informs the reasoning for objective, policy, and rule setting within the planning framework.</p> <p>Ātiawa seek that explicit reference to the matters included in Part 2, s(e) of the RMA are included to ensure they are recognised and provided for in this planning framework.</p>	Amend to: Mana whenua / tangata whenua values, Te Ao Māori and mātauranga Māori have not been given sufficient weight in decision-making, including from governance level through to the implementation. As a result, mana whenua / tangata whenua values, including our relationship with our ancestral lands, water, sites, wāhi tapu and other taonga have not been adequately provided for in resource management, causing disconnection between
S131.013	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	<p>Ātiawa supports the inclusion of Objective A. Objective A strengthens the position of te ao Māori, including mana whenua and mātauranga Māori in resource management. Ātiawa recognises the importance of this provision as it sets out what is to be achieved in the region and demonstrates to plan users that at the highest level te ao Māori must be embraced and provided for.</p> <p>Ātiawa seek reference the connection between mana whenua and te taaio. This relationship is inextricable and of the upmost importance to Ātiawa. There should be explicit reference in this Objective to ensure that the relationship is provided for in the RPS.</p> <p>In addition, mātauranga Māori should also guide the "Integrated management of the region's natural and built environments." Finally Ātiawa note that natural and physical resources are taonga. s6 of the RMA requires that those matters are not only recognised but also provided for.</p>	<p>Insert new subclause: (aa) support the connection between mana whenua and te taiao</p> <p>Insert the words: Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and mātauranga Māori and: Amend subclause (e): (e) recognises and provides for the role of both natural and physical resources in providing for the characteristics and qualities of well-functioning urban environments; and</p>
S131.014	Chapter 3.1A: Climate change	Climate change introductory text	Support	<p>Ātiawa supports the intent of the chapter introduction, it sets out the rationale for climate change action based on current predictions and modelling. Ātiawa note minor error in paragraph 2, the first sentence (of paragraph 2) does not read well.</p>	<p>Ātiawa seek that the council redraft this sentence ("Predictions for climate change impacts in the Wellington Region significant impacts by 2090 if global emissions are not significantly reduced") so</p>

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					that it makes sense
S131.015	Chapter 3.1A: Climate change	Issue 1: Greenhouse gas emissions must be reduced significantly, immediately and rapidly	Support	Ātiawa supports Issue 1. The wording sets out the rationale for actions to reduce greenhouse gas emissions.	Retain as notified.
S131.016	Chapter 3.1A: Climate change	Issue 2: Climate change and the decline of ecosystem health and biodiversity are inseparably intertwined	Support	Ātiawa supports Issue 2, in particular the reference to the impacts of climate change on mana whenua and our ability to exercise our way of being in Te Ao Tūroa, the natural world. A minor deletion of "the" is sought.	Amend to: Climate change is placing significant additional pressure on species, habitats, ecosystems, and ecosystem processes, especially those that are already threatened or degraded, further reducing their resilience, and threatening their ability to persist. This, in turn, reduces the health of natural ecosystems, affecting their ability to deliver the range of ecosystem services, such as carbon sequestration, natural hazard mitigation, erosion prevention, and the provision of food and amenity, that support our lives and livelihoods and enable mana whenua to exercise their way of being in the Te Ao Tūroa, the natural world.
S131.017	Chapter 3.1A: Climate change	Issue 3: The risks associated with natural hazards are exacerbated by climate change	Support	Ātiawa supports Issue 3. Ātiawa supports reference to mahinga kai which are increasingly under pressure from the impacts of climate change due to being located in sensitive environments. Mahinga kai provide indicators of the overall health of an ecosystem (including the impacts of climate change) therefore should be considered when planning for and decision-making in regards to natural hazards and climate change. In addition, Ātiawa supports moving away from the over-reliance on hard engineering protection works which contradict the natural order of te taiao and are ineffective and expensive in the long-term. Amend Issue 3 to recognise that mana whenua sites, and wāhi tapu are at risk from the impacts of natural hazards.	Amend to: The hazard exposure of our communities, land, sites, wāhi tapu , infrastructure, food (including mahinga kai), and water security is increasing because of climate change impacts on a range of natural hazards. Traditional approaches to development that have not fully considered the impacts on natural systems, and our over-reliance on hard engineered protection works, which will inevitably become overwhelmed and uneconomic to sustain, will ultimately increase the risk to communities and the environment.
S131.018	Chapter 3.1A: Climate change	Issue 4: The impacts of climate change will exacerbate	Support	Ātiawa supports Issue 4. Ātiawa note that mana whenua are especially affected by the impacts of climate change. Ancestral land, water, sites, wāhi tapu and other taonga are often located in environments which are frequently impacted by climate change and natural hazard events. However, mana whenua have limited or no resources to enable mitigation or adaptation.	Retain as notified.

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		existing inequities		Therefore, the impacts of climate change exacerbate existing inequalities for mana whenua	
S131.019	Chapter 3.1A: Climate change	Issue 5: Climate change threatens tangible and spiritual components of Māori well-being	Support	Ātiawa supports Issue 5. This issue outlines the physical impacts of climate change on both tangible and intangible components for mana whenua; climate change threatens the ongoing existence and access to sites of significance, wāhi tapu, urupā, mahinga kai, and marae. Issue 4 and Issue 5 work together to highlight the issues that Māori face today in regards to climate change.	Retain as notified.
S131.020	Chapter 3.1A: Climate change	Issue 6: Social inertia and competing interests need to be overcome to successfully address climate change	Support	Ātiawa supports Issue 5 .	Retain as notified.
S131.021	Chapter 3.1A: Climate change	Objective CC.1	Support in part	Ātiawa supports the overall intent of this Objective. Ātiawa's position is that climate change mitigation and adaptation should be integral part of all aspects of resource management now, not by 2050. Ātiawa acknowledges that some of the other climate change objectives are suited to having the year 2050 as a timeframe, however this objective should not be hemmed in by a timeframe, especially in the context of climate change action (i.e. mitigation and adaptation).	Amend to: Objective CC.1 By 2050, The Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of: (a) sustainable air, land, freshwater, and coastal management, (b) wellfunctioning urban environments and rural areas, and (c) well-planned infrastructure.
S131.022	Chapter 3.1A: Climate change	Objective CC.2	Support in part	Ātiawa supports the overall intent of Objective CC.2. Ātiawa note that as currently wording of the Objective is open to interpretation. It could be argued that those who contribute the largest amount to emissions should carry the largest cost, while those who actively pursue low or no emissions should benefit from this. However, the drafting of the objective could also be interpreted as all parties share fairly (equal) cost and benefit.	Amend to: The costs and benefits of transitioning to a low emission and climate-resilient region are shared fairly to achieve social, cultural, and economic well-being across our communities. To avoid doubt, activities that contribute the largest amount to greenhouse gas emissions should carry the greatest cost, and activities that emit low or no greenhouse gas emissions should receive the greatest benefit

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S131.023	Chapter 3.1A: Climate change	Objective CC.3	Support in part	<p>Ātiawa supports the overall intent of Objective CC.3 to achieve net reduction in emissions by 2030. Ātiawa note that there is no target reduction in greenhouse gases from the rural sector (other than the general net reduction of 50 percent by the year 2030). This undermines Objective CC.2 when referencing sharing fairly costs and benefits of transitioning to a low emission and climate resilient region if there is no target for the second biggest contributor (34% green house gas emissions in the region) to achieve a targeted reduction.</p> <p>The agricultural industry needs support to achieve meaningful greenhouse gas emission reductions, Ātiawa acknowledge that their may be whānau who have agricultural interest, we would want to support those whānau to achieve reductions.</p>	The Regional Council work with the agricultural industry to amend Objective CC.3 to provide ambitious but reasonable targets for reductions in greenhouse gas emissions from the agricultural industry, including a date to achieve the reduction.
S131.024	Chapter 3.1A: Climate change	Objective CC.4	Support	In principle Ātiawa supports Objective CC.4. Ātiawa supports the use of nature-based solutions to provide solutions for climate change mitigation and adaptation. Given the fact that nature-based solutions align with mātauranga Māori approaches, Ātiawa seek to partner with council in identifying approaches.	Amend to: Nature-based solutions and mātauranga Māori are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment.
S131.025	Chapter 3.1A: Climate change	Objective CC.5	Support	Ātiawa supports the inclusion of Objective CC.5 in RPS Change 1. Ātiawa are pleased that an objective has been drafted to support permanent forest	Retain as notified.
S131.026	Chapter 3.1A: Climate change	Objective CC.6	Support	Ātiawa supports the inclusion of Objective CC.6 in RPS Change 1.	Retain as notified.
S131.027	Chapter 3.1A: Climate change	Objective CC.8	Support	Ātiawa supports Objective CC.8.	Retain as notified.
S131.028	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Support in part	Ātiawa supports in part the overall intent of the Chapter Introduction given it provides updated reference to the NPS-FM and Te Mana o te Wai. However, Ātiawa seeks further changes to the introduction to further align wording with current legislation and to reflect best practice and approaches to freshwater management in the region. In general, the chapter introduction is outdated and the changes made are only inserting reference to the NPS-FM and Te Mana o te Wai. It is concerning that in the almost ten years since the policy statement was made operative (24 April 2013) there have been no amendments made to the context and freshwater issues in the region. Although Ātiawa acknowledges many of these	Mana whenua and Regional Council work together to redraft the chapter introduction, this could be addressed as part of the plan change process to give full effect to NPS-FM by 31 December 2024.

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				<p>issues are enduring and remain the same, some of the wording does not reflect a 2022 view of freshwater management.</p> <p>Noting that a local authority must commence a review of a provision if the provision has not been subject to review during the previous 10 years (s79, RMA). Ātiawa seeks clarity on the timing on the outstanding provisions that have not been reviewed through RPS Change 1. Ātiawa note that plan change processes are a significant draw on iwi resources and capacity. Where there is sufficient time it makes sense to review these freshwater provisions in a holistic manner, rather than a piece meal approach.</p>	
S131.029	Chapter 3.4: Fresh water (including public access)	Objective 12	Support	<p>Ātiawa are supportive of Objective 12, Ātiawa are pleased the hierarchy of obligations has been included as an objective. This explicitly sets out how freshwater is to be managed in the region and is consistent with national policy direction (NPS-FM). Ātiawa also supports the inclusion of the six principles (from the NPS-FM) relating to the roles of tangata whenua and other New Zealanders in the management of freshwater (including the RPS and its implementation). It is important that these are included as an objective as this provides an expectation that freshwater must be managed in a way that is accordance with these principles. Ātiawa look forward to including statements from Ātiawa ki Whakarongotai at an appropriate time.</p>	<p>Ātiawa seek that Regional Council prepare a plan change (using the Freshwater Plan Change Process) to insert Ātiawa ki Whakarongotai statements at the appropriate time.</p>
S131.030	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems introductory text	Support in part	<p>In principle Ātiawa supports the intent of Chapter 3.6. Ātiawa seeks reference to not only iwi, but also whānau and hapū. It is a dated approach to refer to iwi as an all encompassing group, although whānau and hapū make up an iwi, appropriate recognition must be given to whānau and hapū especially in the context of action to protect, maintain and enhance of indigenous ecosystems where whānau and hapū undertake their own efforts to restore ecosystems.</p> <p>Ātiawa note that some definitions are bold and italicised and others are just in italics, this approach is inconsistent and it is not clear what the rationale is for this distinction.</p> <p>Ātiawa seek that mana whenua and landowners are provided for in septate issue statements. Our values and role as mana whenua is not the same as landowners (unless it is in reference to Māori landowners) and should be recognised and provided in accordance with Te Tiriti and the RMA.</p>	<p>Amend to:</p> <p>Although New Zealand has an extensive network of public conservation land (comprising over a third of the country), this does not adequately represent all types of indigenous ecosystem. With few options to expand the public conservation estate, The restoration of ecosystems relies upon the good will and actions of landowners. There are a number of individuals, whānau, hapu, iwi, and community groups and organisations throughout the region that are working to restore indigenous ecosystems. Public supports for restoring indigenous ecosystems on public land and landowners retiring farmland has led to the regeneration of indigenous bush in rural gullies, along riparian margins, in regional parks and in urban backyards. This has led to increases in some indigenous habitats, such as in the hills around Wellington City, with sanctuaries such as Zealandia and pest control efforts increasing the number and variety of native birds</p>

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					<p>and invertebrates around the city. However, there is still much work to be done to improve the conservation status of many native ecosystems and species. The restoration of indigenous ecosystems on public, whānau, hapū, iwi and private land provides both public and private benefit...</p> <p>3. Iwi Mana whenua/tangata whenua and landowner values and roles are not adequately recognised and supported Mana whenua /tangata whenua values, including kaitiakitanga, are not adequately recognised and supported by the current approach to managing indigenous biodiversity. The conservation efforts of landowners, as stewards of their land, and local communities could be better recognised and supported.</p>
S131.031	Chapter 3.6: Indigenous ecosystems	Objective 16	Support	In principle Ātiawa supports Objective 16. Ātiawa would like to be involved in any process that identifies significant sites to ensure that mana whenua are part of decision-making that could involve land held by Māori.	Retain as notified.
S131.032	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support in part	Ātiawa seeks that pre-notification drafting of Objective 16A be reinstated and current RPS Change 1 Objective 16A is deleted. There is no direct reference to ecosystem health, ecological integrity, and ecological connectivity of indigenous ecosystems in the current wording of Objective 16A. This appears to be an oversight as these factors are outlined as key issue and should be addressed as an objective.	Amend: Objective 16A The ecosystem health, ecological integrity and ecological connectivity of the region's indigenous ecosystems, and the ecological processes that supports them, are enhanced, maintained and restored, so that indigenous biodiversity and mahinga kai is thriving and is resilient to environmental pressures particularly climate change, and giving effect to Te Rito o te Harakeke.
S131.033	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support in part	Ātiawa seeks that consistent reference to ecosystems rather than biodiversity is applied to Objective 16B. Ātiawa seeks that reference to support and resourcing is included, it is a significant part of the relationship between local government and mana whenua under Te Tiriti to provide equitable outcomes for mana whenua/tangata whenua. Without adequate support and resourcing mana whenua/tangata whenua are limited in their ability to participate in decision-making, which includes exercising kaitiakitanga.	Placeholder Objective 16B Mana Whenua/tangata whenua values relating to indigenous biodiversity ecosystems , particularly taonga species and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making and mana whenua/tangata whenua are enabled to exercise their kaitiakitanga through adequate support and resourcing are supported to exercise their kaitiakitanga for

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					indigenous biodiversity.
S131.034	Chapter 3.8: Natural hazards	Natural hazards introductory text	Support in part	Ātiawa supports that the Regional Council have explicitly outlined climate change will occur, rather than 'having the potential to' or 'expected to'. Ātiawa seeks that the natural environment be referred to in Issue 1. The natural environment is at risk and can be significantly altered through a natural hazard event, many of these natural environments have value including mana whenua values and should be protected. Ātiawa acknowledges that natural hazards are a naturally occurring phenomena and it is not possible or appropriate to protect everything, everywhere. However, there are parts of the natural environment that provide for mahinga kai, sites of significance including wāhi tapu, wāhi tupuna that should be considered in regard to reducing the impacts of natural hazards. This amendment complements Objective 19 and the reference to the environment.	1. Risks from natural hazards Natural hazard events in the Wellington region have an adverse impact on people and communities, the natural environment , businesses, property and infrastructure.
S131.035	Chapter 3.8: Natural hazards	Objective 19	Support	Ātiawa supports Objective 19.	Retain as notified.
S131.036	Chapter 3.8: Natural hazards	Objective 20	Oppose in part	Ātiawa request that areas associated with mana whenua values are included in Objective 20, noting that natural hazard and climate change mitigation and adaptation have traditionally impacted on our values, for example river works to alter the rivers natural course can destroy mahinga kai and sites of significance. Ātiawa seek to protect our values through Objective 20.	Amend to: Objective 20 Natural hazard and climate change mitigation and adaptation activities do not cause or increase the risk from natural hazards or adversely impact on Te Mana o te Wai, Te Mana o te Taiao, areas associated with mana whenua values , natural processes, ecosystems and biodiversity.
S131.037	Chapter 3.8: Natural hazards	Objective 21	Support	Ātiawa supports the amendments made to Objective 21	Retain as notified
S131.038	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	Ātiawa seek reference to mana whenua and our values in reference to the concept of a well-functioning urban environment, in accordance with the NPS-UF.	Amend to: The concept of well-functioning urban environments was introduced in the National Policy Statement on Urban Development 2020. There are a number of characteristics and qualities that contribute to forming a well-functioning urban environment. Well-functioning urban environments enhance the quality of life for residents as it is easier to get around, allows for a greater supply and choice of housing close to where people work or to public transport, and provide vibrant, safe, and cohesive centres that enhance business

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					<p>activity and enable Māori to express their cultural traditions and norms. Well-functioning urban environments enable communities and businesses to be more resilient to the effects of climate change, and the uptake of zero and low-carbon emission modes is supported throughout the region. Well-functioning urban environments have compact urban form and are well-designed and planned through the use of spatial and development strategies and use of design guidance. Well-functioning urban environments are low impact, incorporating water sensitive urban design and managing the effects on other regionally significant values and features as identified in this RPS.</p>
<p>S131.040</p>	<p>Chapter 3.9: Regional form, design and function</p>	<p>Objective 22</p>	<p>Support in part</p>	<p>Objective 22 subclauses (a), (b), (c), (i) and (j) Ātiawa seeks growth that both retains the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. Housing should be supported by life sustaining infrastructure including improved public transport hubs. The tino rangatiratanga of hapū and iwi should be recognised in relation to their land and waterways, and how this can be exercised to better manage the sustainable use of these resources. The manaakitanga that iwi, hapū and ahi kā have provided over generations to share their home with Tangata Tiriti needs to be recognised in the way growth is managed. This includes recognising the significant role of Marae as a spiritual and cultural home for our people, a social hub and in civil emergencies. Proactive initiatives are required to ensure that our unique history, identity and culture is respected and given expression in the region</p>	<p>Specific amendments are proposed in relation to underlying policies.</p>
<p>S131.041</p>	<p>Chapter 3.9: Regional form, design and function</p>	<p>Objective 22</p>	<p>Support</p>	<p>Objective 22 (d) Ātiawa are concerned that development will be enabled prior to infrastructure being established. The provision of adequate and appropriate infrastructure and the design of urban form is foundational to the delivery of housing and intensification. When grounded in and guided by the mātauranga of mana whenua the results enhance the unique identity and culture of this place. If done poorly, housing and intensification can have enduring negative impacts on the relationship of Ātiawa with our lands and waters.</p>	<p>Objective 22 (d) Ātiawa position is that Regional Council must ensure that infrastructure is established prior to housing development to ensure this objective is met.</p>

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S131.042	Chapter 3.9: Regional form, design and function	Objective 22	Support	<p>Objective 22 (f) and (k)</p> <p>Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided. We also support a proactive approach to responding to climate change including managed retreat and increased restrictions on development in high prone flood areas. In line with this, we also support the identification of future new town centres that are removed from flood and liquefaction risk.</p> <p>We support development centred around public transport hubs and walkable catchments. However, the scale of that development needs to be planned and delivered in a way that recognises the rangatiratanga of hapū and iwi in relation to their land and waterways, and how this can be exercised to better manage the sustainable use of these resources. Any policy in relation to catchments and water also needs to be consistent with the hierarchy of obligations of Te Mana o te Wai, and ensure that the primary life-supporting values of freshwater, and secondary values of human rights in relation to water is provided for before other tertiary economic and social values are provided for.</p>	<p>Objective 22 (f) and (k)</p> <p>Retain as notified.</p>
S131.043	Chapter 3.9: Regional form, design and function	Objective 22	Support	<p>Objective 22 subclause (g) and (h)</p> <p>Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided. We also support a proactive approach to responding to climate change including managed retreat and increased restrictions on development in high prone flood areas. In line with this, we also support the identification of future new town centres that are removed from flood and liquefaction risk.</p>	<p>Objective 22 subclause (g) and (h)</p> <p>Retain as notified.</p>
S131.044	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	<p>Objective 22A</p> <p>Seeks growth that both retains the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. Housing should be supported by life sustaining infrastructure including improved public transport hubs. The tino rangatiratanga of hapū and iwi should be recognised in relation</p>	<p>Amend Objective 22A and underlying policies to address the relief sought in the submission.</p>

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				to their land and waterways, and how this can be exercised to better manage the sustainable use of these resources. The manaakitanga that iwi, hapū and ahi kā have provided over generations to share their home with Tangata Tiriti needs to be recognised in the way growth is managed. This includes recognising the significant role of Marae as a spiritual and cultural home for our people, a social hub and in civil emergencies. Proactive initiatives are required to ensure that our unique history, identity and culture is respected and given expression in the region.	
S131.045	Chapter 3.9: Regional form, design and function	Objective 22B	Support in part	<p>Ātiawa support the rural area being strategically planned and impacts on significant values and features managed effectively. Ātiawa has an enduring whakapapa relationship with the natural and physical environment. Our values, kaupapa and taonga are our enduring platform. Our vision is for our people to be able to live their lives in the rohe of Ātiawa ki Whakarongotai in harmony with te taiao. This means we need to ensure the sustainable use of taonga and te taiao and that there are minimal impacts to our taonga and community through decision-making around development. Managing the effects of water supply systems, stormwater and wastewater disposal services and transport infrastructure on our cultural values is critical.</p> <p>We support a proactive approach to responding to climate change including managed retreat and increased restrictions on development in high prone flood areas. In line with this, we also support the identification of future new town centres that are removed from flood and liquefaction risk. Water is a taonga that must have its mana and wairua protected and enhanced. Ātiawa support the move away from the use of hard structures to provide storm and flood protection.</p> <p>Ātiawa seek specific reference to mana whenua values in Objective 22B to ensure they are managed effectively in the rural area in regards to development. The Trusk seek deletion of the word identified as it is not appropriate or necessary to provide an extensive list of mana whenua values in the RPS.</p>	Amend as follows: Objective 22B Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features, including mana whenua values identified in this RPS are managed effectively.
S131.046	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate	Support		Ātiawa supports the amendments to Policy 2.

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		matter, and reducing greenhouse gas emissions - regional plans			
S131.047	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>Ātiawa have an interest in this Policy. In principle Ātiawa supports the intent of Policy CC.1 to reduce carbon emissions generated by transport.</p> <p>Ātiawa wants to ensure that maximising modal shift from private vehicles to public transport or active modes does not exacerbate existing inequalities.</p> <p>That is, ensuring accessibility for all capabilities - those who cannot easily walk or cycle, ensuring equity for Māori, and those with care-giving responsibilities. For example, it is reported 'that low-income people in some areas, consider it essential to own a car, because they have no other way to do what they need to get done in their lives. Work and other activities are not close enough to walk to; the cycling networks are not safe enough; and public transport is neither frequent nor direct for people who do not work in the central city and live close to train lines or rapid bus routes.'</p>	Ātiawa seek that the Regional Council partner with all parts of the community and mana whenua to manage transport infrastructure and planning to ensure those that faces that biggest barriers are provided for.
S131.048	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	In principle Ātiawa supports Policy CC.2.	Retain as notified.
S131.049	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	In principle Ātiawa supports Policy CC.3.	Retain as notified.

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S131.050	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided. We also support a proactive approach to responding to climate change including managed retreat and increased restrictions on development in high prone flood areas. In line with this, we also support the identification of future new town centres that are removed from flood and liquefaction risk.	Retain as notified.
S131.051	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	Ātiawa supports Policy CC.5. It is important that the word avoid has been applied to this policy, this is supported by Ātiawa.	Retain as notified.
S131.052	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	Ātiawa supports the overall intent of Policy CC.6 to increase permanent forest cover to reduce greenhouse gas emissions, promoting and incentivising indigenous forest cover and avoiding plantation forestry on highly erodible land. The Trust is concerned that this policy could affect whānau, hapū, and iwi that have an interest in plantation forestry.	Ātiawa seeks that further engagement occurs with Māori who have land that could be affected by Policy CC.6.
S131.053	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-	Support in part	Ātiawa want nature based solutions; and we want to ensure that the ecosystems and habitats that support those nature based solutions are protected/enhanced/restore.	Amend to: Policy CC.7: Providing for nature-based solutions to climate change in development and infrastructure planning and design.District and regional plans shall include objectives, policies, rules and methods to protect, restore and enhance ecosystems and habitats that provide nature based solutions and mātauranga Māori approaches to

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		based solutions to climate change - district and regional plans			climate change, including development and infrastructure planning and design. Priority shall be given to actions that provide the greatest cobenefit for climate change mitigation and adaptation, indigenous biodiversity, fresh and coastal water. District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design.
S131.054	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	In principle Ātiawa supports the intent of Policy CC.8. However, the Policy (and RPS Change 1) lacks sufficient detail on how activities will be identified and how scale will be determined. It is concerning that some activities could be excluded from prioritising reducing greenhouse gas emissions over offsetting, particularly hard-to-abate sectors.	Amend to: Explanation This policy recognises the importance of reducing gross greenhouse gas emissions as the first priority, and only using carbon removals to offset emissions from hard-to-abate sectors. Relying heavily on offsetting will delay people taking actions that reduce gross emissions, lead to higher cumulative emissions and push the burden of addressing gross emissions onto future generations.
S131.055	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support in part	Policy 3 does not provide strong policy direction, particularly providing the clear distinction between how matters in clause (a) and (b) should be considered. The policy relies on the explanation to clarify that matters in (b) can compromise, modify or otherwise diminish the natural character. Ātiawa seeks that Regional Council partner with mana whenua when identifying areas with high natural character. Ātiawa maintain their rangatiratanga within the Ātiawa rohe. Te Tiriti guarantees a partnership approach to resource management.	Amend to: In partnership with mana whenua , district and regional plans shall include policies, rules and/or methods to protect high natural character in the coastal environment from inappropriate subdivision, development and/or use. Natural character should be assessed considering the following matters, with a site determined as having high natural character when the landscape is slightly modified or unmodified, the land-cover is dominated by indigenous vegetation and/or the vegetation cover is natural and there are no apparent buildings, structures, or infrastructure:
S131.056	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and	Support	Ātiawa supports the amendments to Policy 7, particularly the intent to transition to low or zero carbon energy and infrastructure. Insert the words, 'national' and 'regional' to make it clear at what level these benefits occur.	Amend to: Explanation Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits at both the regional and

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		regionally significant infrastructure - regional and district plans			national scale both within and outside the region , in particular if regionally significant infrastructure is a low or zero carbon development
S131.057	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	In principle Ātiawa supports Policy 9.	Retain as notified.
S131.058	Chapter 4.1: Regulatory policies	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support		Ātiawa supports the deletion of Policy 10 as its content has been provided through Policy 9 and Policy CC.2 which better provide for climate change through greenhouse gas emission reductions from the transport industry.
S131.059	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	Ātiawa supports the amendments to Policy 11.	Retain as notified.
S131.060	Chapter 4.1:	Policy EIW.1: Promoting	Support	Ātiawa supports Policy EIW.1. Ātiawa recognises the impacts of the transport industry on climate change. Ātiawa seeks that Regional	Ātiawa recognises the impacts of the transport industry on climate change. Ātiawa seeks that Regional Council actively work with a range of people who represent all capabilities, abilities, and

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	Regulatory policies	affordable high quality active mode and public transport services - Regional Land Transport Plan		Council actively work with a range of people who represent all capabilities, abilities, and minorities to develop the Regional Land Transport Plan to ensure that the transportation needs reflect all parts of the community, including the most vulnerable, whilst reducing greenhouse gas emissions.	minorities to develop the Regional Land Transport Plan to ensure that the transportation needs reflect all parts of the community, including the most vulnerable, whilst reducing greenhouse gas emissions.
S131.061	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	<p>In principle Ātiawa supports Policy 12, we support giving effect to Te Mana o te Wai, which is a statutory obligation, we are pleased that this policy sets out a clear framework for implementing the NPS-FM. Ātiawa seeks reference to mātauranga Māori to enable 'ki te tirohanga Māori'/Māori world view, values and systems, knowledge to be applied to freshwater management. The application of mātauranga Māori is provided for in the NPS-FM.</p> <p>In addition, Ātiawa seek reference to ki uta ki tai, an integrated approach is included as a subclause to Policy 12. Ātiawa has identified in our Kaitiakitanga Plan the value of natural order and balance; that the health of one component of the environment can not be understood in isolation from the whole, that all things are connected and that the well-being of the whole always has to be the frame within which kaitiakitanga is actioned. Freshwater must therefore be managed using a ki uta ki tai, an integrated approach, it is well understood that one part of the water cycle affects another - fragmented and piecemeal approaches to freshwater management only provide localised outcomes, or at times fail to achieve any meaningful improvement as they fail to address the key driver of poor freshwater quality and quantity. Ki uta ki tai must be applied to freshwater</p>	<p>Amend to: Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, rules and/or methods that:</p> <p>(a) are prepared in partnership with mana whenua / tangata whenua;(aa) enable the application of mātauranga Māori;(ab) adopt an integrated approach, ki uta ki tai;</p> <p>(b) achieve the long-term visions for freshwater;</p> <p>(c) identify freshwater management units (FMUs);</p> <p>(d) identify values for every FMU and environmental outcomes for these as objectives;</p> <p>(e) identify target attribute states that achieve environmental outcomes, and record their baseline state;</p> <p>(f) set environmental flows and levels that will achieve environmental outcomes and long-term visions;</p> <p>(g) identify limits on resource use including take limits that will achieve the target attribute states, flows and levels and include these as rules;</p> <p>(h) identify non-regulatory actions that will be included in Action Plans that will assist in achieving target attribute states (in addition to limits); and</p> <p>(i) identify non-regulatory and regulatory actions in Actions Plans required by the NPS-FM</p>

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				<p>management to give effect to Te Mana o te Wai and in implementing the NPS-FM, and therefore create meaningful and measurable improvement to freshwater quality and quantity in the region. Ātiawa notes that Te Mana o te Wai can only be interpreted by mana whenua, Ātiawa are yet to complete the process to contextualise this concept for our rohe. This process will occur concurrently to RPS Change 1. Therefore, further changes to the RPS will be required to give effect to Ātiawa interpretation of Te Mana o te Wai at the appropriate time.</p>	
S131.062	Chapter 4.1: Regulatory policies	Policy 13: Allocating water - regional plans	Support	<p>Ātiawa supports the proposed deletion of Policy 13, given that water allocation will be addressed through new policies introduced as part of RPS Change 1 in accordance with the national direction to assess environmental flows and levels and identify take limits. Ātiawa look forward to addressing this important and sensitive issue through the Whaitua o Kāpiti process.</p>	Retain proposed deletion.
S131.063	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	<p>Ātiawa supports the overall intent of Policy 14, the policy includes much greater controls and checks for managing the effects of urban development on freshwater and the coastal marine area, including recognising and providing for mana whenua freshwater values.</p>	Retain as notified.
S131.064	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	<p>Ātiawa supports reference to providing for mana whenua values, and our relationship with our culture, land, water, sites, wāhi tapu and other taonga. Ātiawa supports this consideration to be applied to regional and district plans to ensure that those mana whenua values are provided for in regards to earthworks and vegetation clearance. These two activities can have</p>	<p>Amend to: Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to the extent necessary to achieve the target attribute states for water bodies and freshwater ecosystems including the effects of these activities on the lifesupporting capacity of soils, and to provide for mana whenua / tangata whenua and their relationship with their culture, land, water, sites,</p>

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				<p>devastating impacts on mana whenua values when poorly managed.</p> <p>The current drafting does not provide strong policy direction, the words 'to the extent necessary' are open to interpretation, and are a soft approach to the management earthworks and vegetation disturbance. Ātiawa has suggested the deletion of those words to ensure target attribute states are achieved and mana whenua values are provided for.</p>	<p>wāhi tapu and other taonga.</p> <p>The current drafting does not provide strong policy direction, the words 'to the extent necessary' are open to interpretation, and are a soft approach to the management earthworks and vegetation disturbance. Ātiawa has suggested the deletion of those words to ensure target attribute states are achieved and mana whenua values are provided for.</p>
S131.065	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support	<p>In principle Ātiawa supports the amendments to Policy 17 which provides for the of obligations to be applied to water takes. Ātiawa also supports the inclusion of subclause (d) to include the taking of water for marae as part of the health needs of people. Ātiawa is keen to understand how this policy will be applied to current water permits, especially where catchments are over-allocated or nearing overallocation. Water rights (including permits) are a significant issue for Ātiawa</p>	Retain as notified.
S131.066	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Ātiawa supports the amendments to Policy 18 which introduce stronger controls to protect and restore the ecological health of water bodies. In particular, Ātiawa supports inclusion of subclause (a) and (b) which provide for Te Mana o te Wai and mana whenua involvement (including at decisionmaking) as well Māori freshwater values. Ātiawa seek that an integrated approach, ki uta ki tai also be included in the list of subclauses. It cannot be understated that understanding and managing the natural environment, particularly ecological health of water bodies is integral to achieving improves to ecological health. Additionally, Ātiawa seeks reference to mātauranga Māori. Mātauranga Māori should be recognised and provided for as part of this policy, the NPSFM provides for mātauranga Māori to be applied to all freshwater</p>	<p>Include new subclauses:(bb) Adopt an integrated approach, ki uta ki tai, that recognises the interconnectedness of the whole environment to ensure that ecological health of freshwater is managed in an integrated, ecosystem wide approach(bc) Incorporate the use of mātauranga Māori to protect and restore ecological healthAmend the following subclauses:</p> <p>(n) restrictingavoid the reclamation, piping, straightening or concrete lining of rivers;</p> <p>(o) restrictingavoid stock access to estuaries, rivers, lakes and wetland;</p> <p>(p) restrictingavoid the diversion of water into or from wetlands - unless the diversion is necessary to restore the hydrological variation to the wetland;</p> <p>(q) restrictingavoid the removal or destruction of</p>

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				management (including ecological health). Ātiawa seeks that the word 'avoid' replace the word 'restricting' in subclauses (n),(o),(p),(q), to ensure that these activities are avoided in order to protect and restore ecological function. Ātiawa is concerned that the word 'restrict' could allow leniency and allow activities to occur that have adverse outcomes for ecological function.	indigenous plants in wetlands and lakes; and
S131.067	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support	Ātiawa supports in principle reducing demand on water supply and encouraging more efficient use of water.	Retain as notified
S131.068	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support	Ātiawa supports in principle reducing demand on water supply and encouraging more efficient use of water.	Retain as notified.
S131.069	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Ātiawa supports reference to Te Mana o te Wai, and that district plans must include objectives, policies, and methods (including rules) that give effect to Te Mana o te Wai. Ātiawa is pleased that particular consideration has been given to partnering with mana whenua, Māori freshwater values (including mahinga kai) and other values, providing for a ki uta ki tai approach, and the use of mātauranga Māori.	Retain as notified.
S131.070	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support in part		Ātiawa support financial contributions to be applied to subdivision and development to mitigate the management of offsite stormwater quality and quantity treatment is required
S131.071	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant	Support in part	Ātiawa supports identifying and protecting indigenous ecosystems and habitats. Indigenous ecosystems and habitats not only play a vital role in ensuring the health, well-being and balance of te taiao, but also provide for mana whenua values such as mauri, wairua, whakapapa and	Amend to: By 30 June 2025, district and regional plans, in partnership with mana whenua shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values; these ecosystems and habitats will be considered significant if they meet one or more of the

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		indigenous biodiversity values - district and regional plans		<p>mana. When our indigenous ecosystems are flourishing and abundant it enables Ātiawa to interact with te taiao to undertake activities which enhance our relationship with te taiao, thereby strengthening our identity. Ātiawa supports subclause (e) which enables mana whenua to identify indigenous ecosystems and habitats that are significant to mana whenua. Therefore mana whenua seek to work in partnership with local authorities to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values. Ātiawa seek clarity on why the timeframe (30 June 2025) has been extended by one year compared to the pre-notified version date of 30 June 2024. Ātiawa are concerned that indigenous ecosystems and habitats that don't meet criteria to be considered 'significant' will then perceived as okay to modify and destroy. We do not support this and seek that the Regional Council avoid this from occurring.</p>	following criteria:
S131.072	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	<p>While Ātiawa supports provisions to protect indigenous ecosystems and habitats from inappropriate subdivision, use and development. Ātiawa opposes the use of biodiversity offsetting and biodiversity compensation methods where an ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana whenua). We seek to work in partnership with Regional Council to identify ecosystems and habitats that contain mana whenua values.</p>	<p>Amend to include new subclause: (a) not provide for biodiversity offsetting: (i) where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or (ii) when an activity is anticipated to causes residual adverse effects on an area after an offset has been implemented if the ecosystem or species is threatened or the ecosystem is naturally uncommon;(iii) the ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana whenua). (b) not provide for biodiversity compensation where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally uncommon,or, the ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana</p>

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					whenua).;
S131.073	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support	Ātiawa supports the role of mana whenua to be recognised and provided for through Policy IE. 1. The policy clearly sets out ways to enable mana whenua to exercise their kaitiakitanga.	Retain as notified.
S131.074	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	While Ātiawa supports the overall intent of Policy 29, Ātiawa is concerned with details of the policy. In particular, (d), Ātiawa is concerned that Regional Council is determining how mana whenua can develop and use their land. Ātiawa acknowledges that it is important to avoid development in areas where risk is high to extreme; however any remnants of land held by Māori that trigger this subclause would be significantly limited. Ātiawa would like to work with Regional Council to determine which areas are affected by natural hazards (both low/tolerable and intolerable) to work together through any issues that capture land held by Ātiawa ki Whakarongotai uri.	Amend to: Regional and district plans shall: (a) partner with mana whenua to identify areas affected by natural hazards; and (b) use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over a 100 year planning horizon; (c) include objectives, polices and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (d) include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards are assessed as high to extreme.
S131.075	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support	Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided. We also support a proactive approach to responding to climate change.	Retain as notified.

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S131.076	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	<p>Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided.</p> <p>We also support a proactive approach to responding to climate change.</p>	Retain as notified.
S131.077	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	<p>Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided.</p> <p>We also support a proactive approach to responding to climate change.</p>	Retain as notified.
S131.078	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	<p>Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided.</p> <p>We also support a proactive approach to responding to climate change.</p>	Retain as notified.
S131.079	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana	Support in part	<p>Ātiawa position is that papakāinga should be provided for, not just recognised. Papakāinga are a taonga that enable tangata whenua to live on and be sustained by their ancestral land in accordance with tikanga Māori. Papakāinga development should enable Māori to live as Māori, and should support tangata whenua to thrive as a community.</p>	Amend as follows: (c) recognising providing for the historical, contemporary, cultural, and social importance of papakāinga; and [Retain remainder of policy as drafted.]

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		whenua / tangata whenua with their ancestral land - district plans		This includes the social, cultural and economic wellbeing of iwi, hapū and whānau.	
S131.080	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support	Ātiawa supports Policy IM.1. Ātiawa is pleased that the drafting supports Te Tiriti; the policy principally recognises and upholds several core concepts that are fundamental to the ao Māori approach to resource management, including working in partnership with local government, ki uta ki tai/integrated management, mātauranga Māori.	Retain as notified.
S131.081	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Support	Ātiawa supports ensuring that resource management creates fair and equitable outcomes and avoids exacerbating inequalities.	Retain as notified.
S131.082	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Ātiawa supports reducing greenhouse gas emissions from transport by ensuring that resource consent for subdivision, use and development are designed in a way that optimise travel demand and maximise modal shift (from private vehicles to public transport and active modes). We support development centred around public transport hubs and walkable catchments. However, the scale of that development needs to be planned and delivered in a way that recognises the rangatiratanga of hapū and iwi in relation to their land and waterways, and how this can be exercised to better manage the sustainable use of these resources.	Retain as notified.
S131.083	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising	Support	While Ātiawa acknowledges the Regional Council's views on freight distribution centres and their proximity to efficient transport networks, Ātiawa is concerned that there could be adverse effects on mana whenua values from their construction in our rohe. Ātiawa seeks active	Retain as notified.

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		greenhouse gas emissions - consideration		involvement in decision-making to avoid adverse outcomes for mana whenua and our relationship with our culture, traditions, ancestral lands, water, sites, wāhi tapu and other taonga in the development of new freight distribution centres and new industrial areas.	
S131.084	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support in part	Ātiawa supports ensuring that carbon emission assessments are considered in the whole-of-life context to assess the environmental impact of new and altered transport infrastructure. Ātiawa seeks that stronger wording be applied to this policy, rather than the word 'encourage' which could be interpreted an optional part of a resource consent application. Considering greenhouse gases from transport represent the largest contribution (39%) to emissions in the region, the Regional Council should go further to ensure that these assessments are required as part of the consent application.	Amend to: Policy CC.11: Encouraging Whole of life carbon emissions assessment - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, a whole of life carbon emissions assessment is required encouraged for all new or altered transport infrastructure as part of the information submitted with the application. This information will assist with evaluating the potential greenhouse gas emissions, options for reducing direct and indirect greenhouse gas emissions and whether the infrastructure has been designed and will operate in a manner that contributes to the regional target for a reduction to transport-related greenhouse gas emissions.
S131.085	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Ātiawa supports the protection, enhancement and restoration of ecosystems, Ātiawa acknowledge the significant benefits that ecosystems and nature-based solutions provide to climate change and natural hazards. The wording of the policy does not provide a strong mechanism to protect, enhance and restore ecosystems. We do not think is appropriate, we seek clear policy direction to ensure biodiversity is protected, enhanced and restored.	When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to: a) protecting ecosystems from adverse effects of an activity on climate change mitigation or adaptation functions and; b) enhance or restoring ecosystems where the ecosystem health is in a degraded state in order to for nature-based solutions to provide climate change mitigation or adaptation functions. Priority shall be given to actions that provide the greatest cobenefits for climate change mitigation and adaptation, indigenous biodiversity, fresh and coastal water. a determination shall be made as to whether an activity may adversely affect a nature-

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					based solution to climate change and particular regard shall be given to avoiding adverse effects on the climate change mitigation or adaptation functions
S131.086	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	Ātiawa note that the agricultural sector should be supported to reduce and avoid greenhouse gas emissions from their activities.	Retain as notified.
S131.087	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	Ātiawa supports providing for actions and initiatives (including nature-based solutions) to contribute to climate resilient urban areas.	Retain as notified.
S131.088	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	In principle Ātiawa supports options for renewable energy generation. Ātiawa seeks to be actively involved in resource consent applications where renewable energy activities could impact on mana whenua values, particularly with our relationship with culture, traditions, ancestral lands, water, sites, wāhi tapu and other taonga.	Retain as notified.
S131.089	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater	Support in part	While Ātiawa supports the protection and enhancement of the health and well-being of water bodies and freshwater ecosystems, Ātiawa is concerned that this policy applies only to regional consents. Ātiawa seeks that this policy apply where relevant to district consents. When viewing the natural environment through an integrated lens, which is a widely acknowledged and	Policy 40: Protecting and enhancing the health and wellbeing of water bodies and freshwater ecosystems - consideration When considering an application for a regional resource consent, particular regard shall be given to:

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		ecosystems - consideration		accepted principle, the effects of land use effect other parts of the natural environment. That is, what occurs on the land, if poorly management can have poor outcomes for water, biodiversity, and the ecosystem. An integrated approach to resource management is a key aspect of RPS Change 1, as it is currently drafted this policy does not align with this approach. Ātiawa does not propose to address responsibilities of regional and local authorities, rather to address at a high level that all freshwater management must (whether direct or indirect) must be managed in a way that gives effect to the NPS-FM, including Te Mana o te Wai.	
S131.090	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	<p>Ātiawa supports controls to manage the effects of earthworks and vegetation disturbance, this is a significant resource management issue for Ātiawa.</p> <p>Ātiawa seeks that erosion is considered as part of this policy, it is not clear why this has been removed from the framework as impacts of erosion remain a significant issue in the region.</p> <p>Ātiawa seek that all discharges to water bodies are avoided, regardless whether suspended sediment limits are exceeded or not. Sedimentation of water ways pose significant risk to water quality in the region. In addition, Ātiawa seeks that Te Mana o te Wai, and other mana whenua values are given effect to when considering earthworks and vegetation disturbance</p> <p>Although Ātiawa supports the intent to achieve environmental outcomes and target attribute states these have not been determined through the Whaitua process for Ātiawa rohe. In the absence of environmental outcomes and target attributes states we seek to work with Regional Council to ensure that there are appropriate interim measures to assess an proposed</p>	<p>Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration</p> <p>When considering an application for a resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by: (a) minimising erosion and the runoff of silt and sediment; and</p> <p>(b) considering whether the activity will achieve environmental outcomes and target attribute states; and</p> <p>(c) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.</p> <p>(d) giving effect to Te Mana o te Wai; and</p> <p>(e) considering the mana whenua values, including mana whenua relationship with their culture, traditions, ancestral lands, water, sites, wāhi tapu, and other taonga.</p>

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				activity against.	
S131.091	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Ātiawa supports the considerations applied to this policy, and the intent of the policy to manage the effects of urban development on freshwater and the coastal and marine area.	Retain as notified.
S131.092	Chapter 4.2: Matters to be considered	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Ātiawa supports deletion of this policy as these matters are provided for in a more holistic manner through Policy 41 and Policy 42.	Retain as notified.
S131.093	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	<p>Ātiawa support the amendments made to Policy 44 to better provide for mana whenua values, including Māori freshwater values, achieving overall ecosystem health, and giving effect to Te Mana o te Wai in regards to water takes and use.</p> <p>Ātiawa seeks specific reference to the hierarchy of obligations to ensure that water takes and use are considered against the national legislation.</p> <p>Additionally, Ātiawa seeks reference to ki uta ki tai, to acknowledge the impact of a water take and usage on the entire water cycle, and the wider ecosystem.</p>	<p>Policy 44: Managing water take and use to give effect to Te Mana o te Wai- consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional plan to take and use water, Te Mana o te Wai must be given effect to so that:</p> <p>(a) Māori freshwater values, including mahinga kai are provided for;</p> <p>(b) sites of significance, wāhi tapu and wāhi tupuna are protected;(bb) the hierarchy of obligations is provided for;(bc) integrated management, ki uta ki tai is considered;</p> <p>(c) Environmental flows and levels, including variability of flows, are achieved;</p> <p>(d) Take limits are achieved that provide for flow or level variability, safeguard ecosystem health, provide for the life cycle needs of aquatic life, and take into account environmental outcomes;</p> <p>(e) the applicant has demonstrated that the volume of watersought is reasonable and justifiable for the intended</p>

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					use,including consideration of soil and crop type when water istaken for irrigation purposes; (f) requiring the consent holder to measure and report theactual amount of water taken; (g) requiring the consent holder to adopt water conservationand demand management measures and demonstrate howwater will be used efficiently; and(h) there is consideration of alternate water supplies such asstorage or capture of rainwater for use during the driersummer months
S131.094	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Ātiawa supports water supply planning for climate change and urban development. Ātiawa is not clear why the approach in the policy only applies to a change, variation, or review of a regional or district plan. Ātiawa seeks that this policy also apply to resource consent applications to ensure that water supply planning is considered as part of resource consent applications.	Amend to: Policy FW.5: Water supply planning for climate change and urban development - consideration When considering an application for resource consent , change, variation or review of a regional or district plan particular regard shall be given to: (a) climate change impacts on water supply, including water availability and demand; (b) demand from future population projections; (c) development of future water sources, storage, treatment and reticulation; and (d) protection of existing and future water sources
S131.095	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support	Ātiawa supports the amendments made to Policy 47 to provide for indigenous ecosystems and habitats. We seek reference to mana whenua values associated with indigenous ecosystems and habitats are provided for in Policy 47 to ensure our values are considered as part of any assessment.	Amend to: (j) recognising and providing for indigenous ecosystems and habitats that contain mana whenua values (including spiritual, historical and cultural characteristics)
S131.096	Chapter 4.2:	Policy IE.2: Maintaining,	Support	Ātiawa supports Policy IE.2, the policy provides for mana whenua, including	Retain as notified.

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	Matters to be considered	enhancing, and restoring indigenous ecosystem health - consideration		our values, mātauranga Māori, and our ability to exercise our cultural practices and ways of being in the natural world.	
S131.097	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>Ātiawa supports in part the proposed amendments to Policy 51. Ātiawa supports the intent of the policy to reduce the impact of natural hazards on the natural and physical environment, as well as anthropological values.</p> <p>Ātiawa is concerned that the policy does not adequately provide for mana whenua values. As it is drafted the policy is silent on any values for mana whenua. Ātiawa seeks a new subclause be added to provide for this.</p> <p>Additionally, Ātiawa seeks to work together with Regional Council, to ensure that decision-making occurs under the principle of partnership to guarantee that mana whenua values are provided for and protected in regards to natural hazards. Ātiawa seeks an additional policy to provide this relief.</p>	<p>Include new subclauses: (f) mana whenua values, including mana whenua relationship with their traditions, ancestral lands, water, sites, wāhi tapu and other taonga.</p> <p>Insert new policy: Policy xx: Partner with mana whenua in decision-making and management processes for natural hazards, to recognise and provide for their relationship with water, land, sites, wāhi tapu and other taonga that is susceptible to such events.</p>
S131.098	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	<p>Ātiawa supports in part the proposed amendments to Policy 52. Ātiawa supports the overall intent of the policy. Ātiawa seeks further amendments to provide for mana whenua values.</p> <p>Ātiawa supports reference to mātauranga Māori options. Ātiawa is encouraged that mātauranga Māori is being recognised by Regional Council given it offers solutions to many resource management issues we face today.</p> <p>Ātiawa seeks that mana whenua lead and partner with Regional Council to develop such solutions. This includes tikanga to protect mātauranga Māori, including how it is used, access, stored and shared.</p> <p>Ātiawa supports the use soft engineering, green infrastructure</p>	<p>Ātiawa inclusion of the following subclauses: (cd) adverse effects on Māori freshwater values, including mahinga kai(ce) adverse effects on mana whenua relationship with their culture, land, water, sites, wāhi tapu and other taonga</p>

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				solutions over hard structural and engineering solutions.	
S131.099	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	<p>Ātiawa note that Section 6 of the RMA states that in "achieving the purpose of this Act, ...shall recognise and provide for ... (e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga"</p> <p>Policy 55 does not adequately recognise and provide to these matters.</p>	<p>Amend as follows:</p> <p>7. Recognises and provides for values, sites and areas of significance and other taonga to mana whenua / tangata whenua,</p> <p>Retain remainder of policy as drafted</p>
S131.0100	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Oppose in part	<p>As it is drafted the policy does not provide for an assessment of the potential impacts of development in rural areas on the natural environment. While Ātiawa recognise that rural areas should maintain their productive nature, it is also realistic to expect development to occur in rural areas, particularly on the fringe of urban settlements. Therefore, Ātiawa seek additional considerations to be included in this policy.</p>	<p>Include new subclauses: (f) the proposal will adversely impact on mana whenua values, including the relationship with traditions, ancestral lands, water, sites, wāhi tapu and other taonga; (g) the proposal is resilient to climate change (h) integrates Te Mana o te Wai consistent with Policy 42(i) protecting indigenous ecosystems and habitats with significant biodiversity values as identified in Policy 23</p>
S131.0101	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support	<p>Ātiawa supports the overall intent of Policy 57. Ātiawa wants to ensure that maximising modal shift from private vehicles to public transport or active modes does not exacerbate existing inequalities. That is, ensuring accessibility for all capabilities - those who cannot easily walk or cycle, ensuring equity for Māori, and those with care-giving responsibilities. For example it is reported that low-income people in some areas consider it essential to own a car, because they have no other way to do what they need to get done in their lives. Work and other activities are not close enough to walk to; the cycling networks are not safe enough; and public transport is neither frequent nor direct for people who do not work in the central city and live close to train lines or rapid bus routes. Ātiawa seeks</p>	Retain as notified.

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				that the Regional Council actively partner with mana whenua and other parts of the community who are most impacted by the proposed policy to provide the greatest benefit to all.	
S131.0102	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	Ātiawa supports the overall intent of policy -that all new urban development, including supporting infrastructure occurs in a sequenced and planned manner. Although Ātiawa recognises this is administratively challenging for regional and district council to coordinate, it is important that councils actively work together to achieve well-functioning urban development. Where infrastructure is available, it should be assessed to measure if the current infrastructure can handle additional capacity (i.e. wastewater and stormwater network that is already at capacity). Ātiawa oppose development being enabled on the basis of programmed infrastructure.	Amend to require that development occurs on the basis of infrastructure provided.
S131.0103	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support	Ātiawa supports Policy UD.2.	Retain as notified.
S131.0104	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose in part	While Ātiawa is supportive of providing for urban development in a strategic and sequenced way, in accordance with mana whenua values, Ātiawa is concerned that responsiveness planning conflicts with the principles of a well-functioning urban development, in particular coordinating and planning for development (including supporting infrastructure). In addition, Ātiawa seek that mana whenua values are recognised and provided for during responsiveness planning for developments	Include new subclause: (e) the proposal shall recognise and provide for mana whenua values, including their culture, ancestral lands, water, sites, wāhi tapu and other taonga.

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				under Policy UD.3.	
S131.0105	Chapter 4.3: Allocation of responsibilities	Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	Support	Ātiawa supports the correction made to Policy 61.	Retain as notified.
S131.0106	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support	Ātiawa supports the direction provided to the regional and city and district councils through Policy FW.6.	Retain as notified.
S131.0107	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	In principle Ātiawa supports the intent of this policy.	Retain as notified.
S131.0108	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Ātiawa note that care should be taken where policies lump together partnering with mana whenua and engaging the community, this relationship should be managed under a Tiriti framework to ensure the principles are upheld. Only mana whenua can identify te ao Māori and mātauranga Māori approaches, and Te Mana o te Wai and Te Rito o te Harakeke.	Ātiawa supports Policy CC.16, and are supportive of partnering with the Regional Council to prepare strategic climate change adaptation plans, mana whenua involvement will be enabled through subclause (g) of this policy. Ātiawa seek that the community is provided for in a separate policy.
S131.0109	Chapter 4.4: Non-regulatory policies	Policy CC.17: Iwi climate change adaptation	Support	Ātiawa supports Policy CC.17, Ātiawa want to ensure that iwi climate change adaptation plans are provided equal consideration and implementation as part of the wider adaptation action/frameworks to plan for climate change.	Retain as notified.

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		plans - non-regulatory			
S131.0110	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	Ātiawa supports increasing regional forest cover, particularly indigenous permanent forest. Ātiawa requests that the Regional Council look for opportunities for mana whenua to partner together in regards to Policy CC.18 and planting of indigenous forest.	Retain as notified.
S131.0111	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	In principle Ātiawa supports Policy 65. Ātiawa would like to see more emphasis on reducing waste first.	(a) applying the 5 Rs (reduce, reuse, recycle, recover, and residual waste management), in particular encourage and supports actions to reduce waste;
S131.0112	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Ātiawa supports the Regional Council promoting and supporting natural and built solutions to attenuate and retain water.	Retain as notified.
S131.0113	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support	Ātiawa supports this policy.	Retain as notified.
S131.0114	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous	Support in part	Ātiawa supports the overall intent of Policy IE.3. Ātiawa seeks that mana whenua partner with Regional Council in this policy. Mana whenua can provide mātauranga Māori that is essential to understanding and identifying	Amend introductory text to Policy IE.3 as follows: To maintain, enhance and restore the ecosystem health, ecological integrity and ecological connectivity of the region's indigenous ecosystems, and the ecological processes that supports them, giving effect to Te Rito o te Harakeke, the Regional Policy

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		ecosystem health - non-regulatory		measures of ecosystem health. In addition, mana whenua are often acutely aware of areas that would benefit from restoration efforts. Further, partnering with mana whenua upholds Te Tiriti and the responsibility of Regional Council to work with mana whenua to protect and provide for mana whenua values at all levels of resource management (governance, decisionmaking, through to practical actions/operational level).	Statement in partnership with mana whenua shall, as soon as practicable:
S131.0115	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support	Ātiawa supports the role and contribution of landowners and communities in the management of indigenous biodiversity. Ātiawa are supportive of Ātiawa acknowledge the collective efforts required to create meaningful improvements to te taiao.	Retain as notified.
S131.0116	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Ātiawa approach to growth is grounded in and guided by our mātauranga, thus recognising the rangatiratanga of hapū and iwi, applying the enduring wisdom of kaupapa Māori and enhancing the unique identity and culture of this place. Proactive initiatives are required to ensure that our unique history, identity and culture is respected and given expression in the region. The Design Guides are a key mechanism in giving effect to our kaupapa (values), huanga (vision) through our tikanga (approach) as expressed in Whakarongotai o te moana, Whakarongotai o te wā.	Amend as follows: (a) implementing the New Zealand Urban Design Protocol and any urban design guidance that provides for best practice urban design and amenity outcomes, including mātauranga Māori and for high density development and medium density residential development;
S131.0117	Chapter 4.5: Methods to	Method FW.1: Freshwater Action Plans	Support	Ātiawa support the preparation of freshwater action plans, in accordance with the NPS-FM. Ātiawa also support mana whenua partnering with Regional Council to prepare freshwater action	Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua, as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP, for each whaitua no later than December 2026. The freshwater action

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	implement policies (regulatory methods)			plans. Ātiawa seek that this partnership model is enabled through funding/resourcing. It is not clear when a freshwater action plan would not be required as part of the NPS-FM which sets out the framework for all freshwater management. Ātiawa seek minor changes in keeping with the NPS-FM text and a deletion of the last sentence which seems to be redundant (all freshwater management must be in accordance with the NPS-FM).	plans may describe both regulatory measures and non-regulatory measure to achieve target attribute states. Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing. will outline non-regulatory measures, which, along with limits and other rules, will achieve target attribute states. Where an action plan is required by the NPS-FM it shall contain both regulatory and non-regulatory actions.
S131.0118	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.1: Climate change education and behaviour change programme	Support	Ātiawa support Method CC.1, in particular the inclusion of te ao Māori and mātauranga Māori. Ātiawa seek that mana whenua actively partner with the Regional Council in the development and implementation phase of any programme that uses Ātiawa values and mātauranga. In addition, this partnership and use of te ao Māori and mātauranga Māori must be enabled through funding and resourcing. Ātiawa note that any use of mātauranga Māori shall be in accordance with tikanga and kawa developed by the relevant mana whenua.	Support and enable climate education and behaviour change programmes, that include Te Ao Māori and Mātauranga Māori perspectives, to support a fair transition to low emission and climate resilient region. The Regional Council will work in partnership with manawhenua to develop and implement climate change education and behaviour change programmes that include te ao Māori and mātauranga Māori. Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing.
S131.0119	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.2: Develop carbon emissions offsetting guidance	Support in part	Ātiawa acknowledge that carbon offsetting will be required in certain circumstances, Ātiawa prefer carbon emissions reductions at source are prioritised.	Ātiawa prefer carbon emissions reductions at source are prioritised.
S131.0120	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.1: Partnering with mana whenua / tangata whenua to give local effect to Te Rito o te Harakeke	Support	Ātiawa support Method IE.1. Ātiawa seek that this partnership model is enabled through funding/resourcing.	Insert the following sentence: Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing.

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S131.0121	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support in part	<p>Ātiawa support the intent of Method 14. Ātiawa seek to partner with Regional Council to undertake research, prepare and disseminate information about natural hazards and climate change. Mana whenua (including our ancestral land, water, sites, wāhi tapu and other taonga) are particularly vulnerable to the impacts of climate change and natural hazards, naturally mana whenua should be actively involved in this method. Ātiawa seek that the Regional Council provide for this partnership through adequate funding and resourcing.</p>	<p>In partnership with mana whenua, undertake research, prepare and disseminate information about natural hazards and climate change effects in order to:</p> <p>(a) guide local authority planning and decision-making; and (b) raise awareness and understanding of natural hazards.</p> <p>Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing</p>
S131.0122	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support in part	<p>Ātiawa note that our approach to growth is grounded in and guided by our mātauranga, thus recognising the rangatiratanga of hapū and iwi, applying the enduring wisdom of kaupapa Māori and enhancing the unique identity and culture of this place. Proactive initiatives are required to ensure that our unique history, identity and culture is respected and given expression in the District. The Design Guides are a key mechanism in giving effect to our kaupapa (values), huanga (vision) through our tikanga (approach) as expressed in Whakarongotai o te moana, Whakarongotai o te wā.</p> <p>Ātiawa support working in partnership with Regional Council to prepare papakāinga design guidance. Ātiawa seek that Regional Council provide for this partnership through adequate funding and resourcing. Additionally Ātiawa seek a partnership model for the entirety of Method UD.1. It is appropriate that the council has identified papakāinga as a kaupapa to work in partnership with mana whenua, we are also interested in all urban development that has the potential to impact on our values, as well as giving effect to concepts such as Te Mana o te Wai (Policy FW.3) - which only mana</p>	<p>In partnership with mana whenua, prepare the following development manuals and design guidance:</p> <p>(a) Urban design guidance to provide for best practice urban design and amenity outcomes in accordance with Policy 67(a); (b) Papakāinga design guidance that are underpinned by kaupapa which is Māori in partnership with Mana Whenua in accordance with Policy 67(f); and (c) Urban design guidance and development manuals to assist developers in meeting Policy CC.14 and Policy FW.3. Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing.</p>

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				whenua can provide the local context and meaning. Amend subclause (b) for ease of reading.	
S131.0123	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support	Ātiawa support Method IM.1. Ātiawa is pleased that an integrated management, ki uta ki tai is being applied and enabled through the regional policy statement, including Method IM.1 Ātiawa seek an amendment to (b) to provide for mātauranga Māori to be applied to all resource management and decision-making.	(b) partner with and provide support to mana whenua / tangata whenua to provide for mātauranga Māori in natural -resource management and decision making; and
S131.0124	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.2: Protection and interpretation of Mātauranga Māori and Māori data	Support	Ātiawa support Method IM.2. Ātiawa seek that the Regional Council provide for this partnership through adequate funding and resourcing.	Insert the following sentence to Method IM.2. Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing.
S131.0125	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Support	Ātiawa support Method FW.2, particularly sub-clause (b). In addition, we seek that local authorities engage early with mana whenua.	Insert subclause: (ba) engage early with mana whenua
S131.0126	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Support	Ātiawa support Method 22.	Retain as notified.
S131.0127	Chapter 4.5: Methods to implement policies (non-	Method 30: Implement the harbour and catchment management strategy for	Support in part	Ātiawa recognise that the Porirua Harbour is not within Ātiawa ki Whakarongotai rohe, the only comment from Ātiawa on this Method is that Regional Council should work in partnership with Porirua mana whenua to develop and implement the Porirua Harbour Catchment	This partnership should be enabled by funding and resourcing through the Regional Council.

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	regulatory methods)	Porirua Harbour		Strategy, if this is desired by mana whenua.	
S131.0128	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 31: Protocol for management of earthworks and air quality between local authorities	Oppose	It is unclear the reasoning for the proposed deletion of Method 31. In particular Ātiawa are concerned that the deletion of the method will result in these effects not being addressed and properly managed.	Retain operative version of Method 31.
S131.0129	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support in part	<p>While Ātiawa support the intent of Method 31, Ātiawa position is that partnering with mana whenua for the purposes of identifying and protecting significant values should be provided for separately to the stakeholders, landowners and the general public and community. Te Tiriti provides for the relationship and partnership between the crown, including local government and mana whenua. In order to uphold Te Tiriti, Regional Council must actively work in partnership with mana whenua to protect and provide for the relationship of mana whenua, their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga (as provided for as a matter of national importance in Part 2 of the RMA). It is not appropriate that stakeholders, landowners (unless Māori landowners) and the community identify places, sites and areas with significant cultural heritage values, or outstanding natural features and landscapes with significant cultural values, or identify indigenous ecosystems and habitats with significance to mana whenua, or mana whenua values associated with rivers and lakes. It is only mana whenua who can identify these sets of values. Ātiawa recognise that stakeholders, landowners and the</p>	<p>Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values Partner with iwi, hapū, marae and/or whānau, and engage with stakeholders, landowners and the community in the to:</p>

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				community also have their own values associated with te taiao, and the collective action is required to protect and enhance te taiao.	
S131.0130	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 33: Identify sustainable energy programmes	Oppose	It is not clear why the Regional Council have proposed to delete Method 33, Ātiawa is concerned that pressure on energy supply and distribution will continue to increase. Ātiawa question how this sustainable energy use will be provided for and implemented without Method 33.	Retain operative version of Method 33.
S131.0131	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support	Ātiawa supports Method 34.	Retain as notified.
S131.0132	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 35: Prepare a regional stormwater action plan	Oppose	It is not clear why the Regional Council have proposed to delete Method 35. Ātiawa are concerned that if Method 35 is deleted from the regional policy statement there will be no mechanism to prepare a regional approach to stormwater management. Ātiawa position is that stormwater management in regards to water quality forms a part of Regional Councils functions under section 30 (f) of the RMA.	Retain operative version of Method 35.
S131.0133	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 46: Develop complex development opportunities	Support in part	Ātiawa seek to ensure that Regional Council and central government partner with mana whenua in the development and implementation of plans and frameworks for each Complex Development Opportunity.	Jointly-In partnership with mana whenua and central government agencies , develop and implement plans and a framework for each Complex Development Opportunity with central government agencies. The Regional Council shall enable this partnership with mana whenua through adequate funding and resourcing.
S131.0134	Chapter 4.5: Methods	Method 47: Analysis of the range	Oppose	Ātiawa oppose deletion of Method 47, a regional analysis of housing, including range and affordability is still necessary, and	Insert amended Method 47: In partnership with mana whenua complete a regional analysis of housing, including

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	to implement policies (non-regulatory methods)	and affordability of housing in the region		essential to understanding a well-functioning urban environment. It is not clear why Regional Council no longer view Method 47 as a mechanism to provide for improving housing range and options, particularly in the interim while a Future Development Strategy is yet to be released.	range and affordability, and explore with private sector developers innovative housing design and/or developments that increase the range of types and affordability in the region.
S131.0135	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Support in part	<p>Ātiawa note the national direction to prepare a Future Development Strategy, however Ātiawa seek reference to hapū and iwi values and aspirations for urban development within Method UD.2 in accordance with the National Policy for Urban Development, subpart 4. The current drafting of Method UD.2 is silent on the role of mana whenua in the development of FDS, this is contrary to the NPS-UD text. Ātiawa have not finalised our Treaty of Waitangi Settlement with the Crown. This process and the intensification provisions also prejudice the outcomes and potential outcomes of our Treaty of Waitangi Settlement. The development of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 and the National Policy Statement on Urban Development 2020, and the timeframes provided for their incorporation into the RPS do not uphold the guarantee of tino rangatiratanga. Ātiawa therefore have fundamental concerns with the process and direction given by the Government requiring this Proposed Plan Change and the proposed Future Development Strategy</p>	<p>Prepare a Future Development Strategy for the Wellington Region in accordance with Subpart 4 of the National Policy Statement for Urban Development 2020. The Future Development Strategy will set out the high-level vision for accommodating urban growth over the long term, and identifies strategic priorities to inform other development-related decisions, such as:</p> <ul style="list-style-type: none"> (a) district plan zoning and related plan changes; (b) priority outcomes in long-term plans and infrastructure strategies, including decisions on funding and financing; and (c) priorities and decisions in regional land transport plans. <p>The Future Development Strategy will provide a framework for achieving well-functioning urban environments in the Wellington Region, including specifying how and where future growth will occur to provide for sufficient capacity to meet future growth needs over the next 30 years. The Future Development Strategy must include a clear statement of mana whenua values and aspirations for urban development. The Future Development Strategy shall be prepared in partnership with relevant mana whenua. Additionally, Ātiawa seek that:</p> <p>Provision is made for Ātiawa tino rangatiratanga within the Future Development Strategy process and for a review of the Strategy on the Ātiawa Settlement with the Crown.</p>
S131.0136	Chapter 4.5: Methods to implement policies (non-	Method CC.4: Prepare a regional forest spatial plan	Support	Ātiawa support Method CC.4, Ātiawa seek to partner with Regional Council on Method CC.4 - we seek specific reference to this partnership in the method.	Using a partnership approach, work with mana whenua to identify where to promote and support planting and natural regeneration of forest, including how to address water quality targets for sediment, to inform the requirements of Policy CC.6.

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	regulatory methods)				
S131.0137	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.6: Identifying nature-based solutions for climate change	Support	Ātiawa support Method CC.6. Ātiawa seek that Regional Council provide for this partnership through adequate funding and resourcing.	Insert the following sentence to Method CC.6. The Regional Council shall enable this partnership with mana whenua through adequate funding and resourcing.
S131.0138	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.7: Advocating for the use of transport pricing tools	Oppose in part	While Ātiawa recognise the significant emissions from the transport industry, Ātiawa are concerned that any pricing tools/taxes will be passed on to citizens. Many whānau may struggle to absorb additional cost to household budgets. Therefore care should be applied when lobbying central government to encourage pricing tools/taxes to ensure these methods do not exacerbate existing inequalities.	Delete Method CC.7.
S131.0139	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Support in part	Ātiawa support partnering with mana whenua to develop an inventory of opportunities for biodiversity offsetting or biodiversity compensation. Ātiawa's position is that priority should be given to protecting, maintaining or enhancing biodiversity. Ātiawa seek that this partnership approach shall be enabled through funding and resourcing.	Insert the following sentence to Method IE.2. Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing.
S131.0140	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.3: Regional biodiversity strategy	Support in part	Ātiawa support intent of Method IE.3. Ātiawa seek that protection should also be included in the regional biodiversity strategy - protection of indigenous biodiversity from the impacts of development, use and subdivision should be considered as part of the framework for regional biodiversity strategy.	Develop and implement, in partnership with mana whenua / tangata whenua and in collaboration with territorial authorities, communities and other key stakeholders, a regional biodiversity strategy to protect , maintain and restore indigenous biodiversity at a Proposed Change 1 to the Regional Policy Statement for the Wellington Region August 2022 Page 190 of 228 landscape scale, incorporating both Mātauranga Māori and systematic conservation planning. Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing.

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S131.0141	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.3: Regional biodiversity strategy	Support in part	Ātiawa support intent of Method IE.3. Ātiawa seek that protection should also be included in the regional biodiversity strategy - protection of indigenous biodiversity from the impacts of development, use and subdivision should be considered as part of the framework for regional biodiversity strategy.	Develop and implement, in partnership with mana whenua / tangata whenua and in collaboration with territorial authorities, communities and other key stakeholders, a regional biodiversity strategy to protect , maintain and restore indigenous biodiversity at a Proposed Change 1 to the Regional Policy Statement for the Wellington Region August 2022 Page 190 of 228 landscape scale, incorporating both Mātauranga Māori and systematic conservation planning. Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing
S131.0142	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Support	While Ātiawa supports the intent of Method 21, Ātiawa seek to partner with Regional Council in the development of a schedule of indigenous ecosystems and habitats with significant indigenous biodiversity values. This will ensure that mana whenua are included in the decision making process in regards to land with indigenous ecosystems and habitats that is held under Te Ture Whenua Māori Act 1993 and general title held by Māori. It also ensures mana whenua values are provided for in the development of the schedule.	The Regional Council will liaise with the region's territorial authorities and partner with mana whenua to ensure that all district plans include, by 30 June 2025 at the latest, a schedule of indigenous ecosystems and habitats with significant indigenous biodiversity values and plan provisions to protect them from inappropriate subdivision, use and development. Where a district-wide indigenous biodiversity assessment has not been initiated by 30 June 2024, the Regional Council will liaise with the territorial authority to agree on a programme of works and an understanding as to whether: (a) the territorial authority shall continue to have sole responsibility; or (b) the Regional Council shall take full responsibility; or (c) the territorial authority and the Regional Council shall share responsibilities. Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing.
S131.0143	Chapter 4.5: Methods to implement policies (non-	Method 48: Water allocation policy review	Support in part	Ātiawa support the intent of Method 48 - water allocation is a significant resource management issue for Ātiawa and Ātiawa are keen to see water allocation addressed in a way that gives effect to the NPS-FM 2020 (including Te Mana o te Wai), as well as providing for mana whenua rights and interests	Review water allocation policy in the regional plan so that: (a) freshwater is allocated and used efficiently; (b) all existing over-allocation is phased out and future overallocation is avoided; (c) avoid allocating water beyond a limit; (d) improve water allocation efficiency- including transferable permits; (e) provide for iwi and hapū rights and interests;

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	regulatory methods)			in water, and overall providing for the well-being of the water and sustainable use of water.	(f) alternatives to first in first served are considered; (g) provide for equitable allocation; (h) adapt to climate change; (i) land use change to more climate resilient uses is promoted; (j) government direction on water allocation is considered; and (k) all matters regarding giving effect to the NPS-FM are provided for considered
S131.0144	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Ātiawa are supportive of actions to actively promote and support changes to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change.	Retain as notified.
S131.0145	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Support	Ātiawa support the intent of Method CC.9. Ātiawa seek the minor amendment to clarify reference to the correct policy.	Provide support, and seek new sources of funding, for programmes that protect, enhance or restore the priority ecosystems identified by Methods IE.2 and Policy CC.7 for their biodiversity values and/or their contribution as naturebased solutions to climate change.
S131.0146	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support	Ātiawa support Method CC.10	Retain as notified

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S131.0147	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.4: Kaitiaki indigenous biodiversity monitoring	Support	Ātiawa support Method IE.4. Ātiawa seek that Regional Council provide for this partnership through adequate funding and resourcing.	Insert the following sentence to Method IE.4: Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing.
S131.0148	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	Support in part	Ātiawa support the principle of enabling partnership models for mana whenua through support such as funding. Ātiawa have sought that a clause that effectively seeks funding for mana whenua be included to all relevant methods. Ātiawa prefer that this clause be included in relevant methods, rather than the approach of Method 53, to ensure that funding occurs and is explicitly provided for.	Include the following clause to all methods that seek to partner with mana whenua: Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing
S131.0149	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support		Ātiawa support Method 54.
S131.0150	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Integrated Management Anticipated environmental results	Support in part	Ātiawa support the intent of the Anticipated Environmental Result (AER), that Regional Council and territorial authorities collaborate to undertake integrated management and recognise the importance of te ao Māori and mātauranga Māori in natural resource management and decision-making. Ātiawa view is that although the AER identified is appropriate to the objective/policy framework, it is so broad that it will not offer meaningful data in terms of monitoring the effectiveness and efficiency of the policies and methods. The AER should be specific and measurable (based on evidence	Ātiawa request that the Regional Council provide more specific, measurable and time-bound AER. Ātiawa seek to work together in the drafting of the AER, particularly given the relationship of the planning framework to mana whenua values.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				when relevant), and appropriately, time-bound. AER and monitoring is an integral step (and statutory requirement) in the planning cycle (plan-domonitor-review), and setting robust and meaningful AER produce better data to understand and assess the planning framework.	
S131.0151	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Climate change Anticipated environmental results	Support	<p>Ātiawa support the intent of the AER to reduce carbon emission by 50 percent (from 2019 levels) by 2030. Ātiawa consider that targets from subclause 1(a),(b) and (c) of Objective CC.3 could be included as AER.</p> <p>Additionally, Ātiawa are concerned that no other AER have been included under the kaupapa 'climate change' that address the other objectives and the issues they seek to address such as permanent forest cover, use of nature base solutions, education programmes, and mana whenua climate change planning.</p>	<p>Ātiawa request that the Regional Council provide more specific, measurable and time-bound AER. Ātiawa seek to work together in the drafting of the AER, particularly given the relationship of the planning framework to mana whenua values. Mana whenua and Regional Council work in partnership to address the impacts from climate change in the Wellington region. This partnership provides for governance and operational input into all aspects of resource management to address climate change, including decision-making. Mana whenua values including their relationship with their culture, ancestral lands, water, sites, wāhi tapu and other taonga are protected and provided for. Mātauranga Māori is applied where appropriate, in accordance with tikanga and kawa, as guided by mana whenua.</p>
S131.0152	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Objective 12 Freshwater Anticipated environmental results	Support	<p>Ātiawa support the overall intent of the AER to monitor freshwater planning provisions. Ātiawa seek further AER be included to ensure that mana whenua involvement in resource management is assessed and therefore those AER action is taken to achieve those AER.</p>	<p>Ātiawa make the following comments and relief sought: Include a timeframe for Freshwater AER #1 (Objective 12). That is when will over-allocation be phased out, this ensures the AER is bound to a timeframe to achieve this outcome, rather than being open-ended, which can result in slow uptake of the provision. Additionally including a timeframe is in keeping with the national direction (NPS-FM). Freshwater quality and quantity in the Wellington Region is managed in accordance with the principles of Te Mana o Te Wai and over allocation in relation to both the quantity and quality of freshwater is phased out as soon as possible over time.</p> <p>Include the following AER to the kaupapa 'Freshwater': Mana whenua and Regional Council work in partnership in the management of freshwater in the Wellington region. This partnership provides for governance and operational input into all aspects of resource management to address freshwater,</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					including decision-making. Mana whenua values including their relationship with their culture, ancestral lands, water, sites, wāhi tapu and other taonga are protected and provided for. Mātauranga Māori is applied where appropriate, in accordance with tikanga and kawa, as guided by mana whenua.
S131.0153	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Objective 13 Freshwater Anticipated environmental results	Support	Ātiawa support the overall intent of the AER to monitor freshwater planning provisions.	Retain as notified.
S131.0154	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Objective 14 Freshwater Anticipated environmental results	Support	Ātiawa support the overall intent of the AER to monitor freshwater planning provisions.	Ātiawa make the following comments and relief sought: Include a timeframe for Freshwater AER #1 (Objective 14). That is when will over-allocation be phased out, this ensures the AER is bound to a timeframe to achieve this outcome, rather than being open-ended, which can result in slow uptake of the provision. Additionally including a timeframe is in keeping with the national direction (NPS-FM). Freshwater quality and quantity in the Wellington Region is managed in accordance with the principles of Te Mana o Te Wai and over allocation in relation to both the quantity and quality of freshwater is phased out as soon as possible over time.
S131.0155	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Indigenous ecosystems Anticipated environmental results	Support	Ātiawa support the proposed AER for the kaupapa 'Indigenous Biodiversity'. Ātiawa seek further AER be included to ensure that mana whenua involvement in resource management is assessed and therefore those AER action is taken to achieve those AER.	Include the following AER to the kaupapa 'Indigenous Biodiversity': Mana whenua and Regional Council work in partnership in the management of indigenous biodiversity in the Wellington region. This partnership provides for governance and operational input into all aspects of resource management to address indigenous biodiversity, including decision-making. Mana whenua values including their relationship with their culture, ancestral lands, water, sites, wāhi tapu and other

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					taonga are protected and provided for. Mātauranga Māori is applied where appropriate, in accordance with tikanga and kawa, as guided by mana whenua.
S131.0156	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Natural hazards Anticipated environmental results	Support	Ātiawa support the proposed AER for Natural Hazards. Ātiawa seek further AER be included to ensure that mana whenua involvement in resource management is assessed and therefore those AER action is taken to achieve those AER.	Include the following AER to the kaupapa 'Natural Hazards': Mana whenua and Regional Council work in partnership in the management of natural hazards in the Wellington region. This partnership provides for governance and operational input into all aspects of resource management to address natural hazards, including decision-making. Mana whenua values including their relationship with their culture, ancestral lands, water, sites, wāhi tapu and other taonga are protected and provided for. Mātauranga Māori is applied where appropriate, in accordance with tikanga and kawa, as guided by mana whenua.
S131.0157	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Regional form, design and function Anticipated environmental results	Support in part	There is no AER related to (h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and	Add the following AER: Mana whenua unique history, identity and culture is respected and given expression in the region. Mana whenua live on and are sustained by their ancestral land in accordance with tikanga Māori. Development provides for the economic and social security of mana whenua. Rāhui and other tikanga Māori tools are implemented when communities fail to self-regulate behaviour and use to the detriment of the environment or sustainability of resources. The valuation of the environment is in terms of how it sustains and supports life to thrive, rather than in terms of financial value. The qualities of the environment that restore, cleanse and heal wairua are protected and enhanced where possible. Critical habitats such as riparian and fish spawning habitat are protected and restored. Ecological connectivity is maintained and protected.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S131.0158	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support in part	<p>Ātiawa acknowledge the need for biodiversity offsetting and biodiversity compensation, Ātiawa are concerned that offsetting and compensation may be preferred over protecting existing biodiversity. Ātiawa maintain an interest in ensuring that mana whenua values, including our relationship with our culture, ancestral lands, water, sites, wāhi tapu and taonga (including taonga species) are protected from biodiversity offsetting and biodiversity compensation. It is important to note that not all mana whenua values can be replaced or replicated, therefore it is not appropriate to apply biodiversity offsetting or compensation where an area contains our values.</p>	<p>Amend to include new subclause: Policy 24(a) directs that where policies and/or rules in district and regional plans enable the use of biodiversity offsetting they shall not provide for biodiversity offsetting: where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset (clause (i)); or when an activity is anticipated to causes residual adverse effects on an area after an offset has been implemented if the ecosystem or species is threatened or the ecosystem is naturally uncommon (clause (ii)) or the indigenous ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana whenua). (Policy 24(b) directs that where policies and/or rules in district and regional plans enable the use of biodiversity compensation they shall not provide for biodiversity compensation where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally uncommon or, the ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana whenua).</p>
S131.0159	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	General comments - anticipated environmental results	Support in part	<p>Submission point relates to Table 17. Ātiawa maintain an interest in ensuring that mana whenua values, including taonga (including taonga species) are protected from residual affects of biodiversity offsetting and biodiversity compensation.</p>	Not stated.
S131.0160	Appendix 3: Definitions	Marae	Oppose	<p>Ātiawa seek to include a new definition of marae, drafted by mana whenua. Ātiawa are concerned that in the absence of any definition for marae, some developments may seek to fall under the policy framework for marae where this is not appropriate.</p>	<p>Ātiawa would like to request that mana whenua work together to draft an appropriate definition for marae.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S131.0161	Appendix 3: Definitions	Papakāinga	Oppose	Ātiawa seek to include a new definition of papakāinga, drafted by mana whenua. Ātiawa are concerned that in the absence of any definition for marae, some developments may seek to fall under the policy framework for papakāinga where this is not appropriate.	Papakāinga means housing and any ancillary activities (including social, cultural, educational, recreational, and commercial activities) for mana whenua on their ancestral land.
S131.0162	Appendix 3: Definitions	Te Mana o Te Wai	Support in part	Ātiawa support defining Te Mana o te Wai in accordance with Section 1.3 of the NPS-FM (2020) Ātiawa note that Te Mana o te Wai will also include local context and interpretation as defined through Te Whaitua o Kāpiti (for Ātiawa ki Whakarongotai rohe) and then given effect through a Freshwater Plan Change Process.	Ātiawa seek that our expression of Te Mana o te Wai (which will be determined through Te Whaitua o Kāpiti) will be included in the RPS at the appropriate time through the Freshwater Plan Change Process.
S131.0163	Appendix 3: Definitions	Te Rito o te Harakeke	Support	Ātiawa support the inclusion of the definition of Te Rito o te Harakeke.	Retain as notified.
S131.0164	Chapter 3.1A: Climate change	Objective CC.7	Support	Ātiawa supports the inclusion of Objective CC.7 in RPS Change 1.	Retain as notified.
S131.0166	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 17: Reducing waste and greenhouse gases emissions from waste streams	Support	Ātiawa support Method 17. Ātiawa seek that Regional Council provide for this partnership through adequate funding and resourcing.	Insert the following sentence to Method 17. Mana whenua are enabled to partner with the Regional Council through adequate funding and resourcing.
S131.0167	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	Ātiawa support Method CC.5, particularly given the high emissions produced from the agricultural industry.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S78 Beef + Lamb New Zealand Limited					
S78.001	General comments	General comments - overall	Oppose	<p>1. The NPS-UD is the primary driver for PC1. Expansion of the scope of PC1 to include freshwater, indigenous biodiversity and climate change response is premature and unnecessary.</p> <p>2. Although Whaitua Implementation Programmes have been developed for three of the five Whaitua, the process has not yet concluded in all Whaitua. Therefore, the proposed PC1 freshwater policies are not fully informed by the outcomes of Whaitua engagement processes.</p> <p>3. There is a risk that the climate change and indigenous biodiversity provisions will misalign or conflict with national guidance.</p> <p>4. PC1 is inconsistent with the Zero Carbon Act and New Zealand's wider approach to climate change</p>	Withdraw all proposed amendments, apart from those detailed in other submission points.
S78.002	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Supports proposed new Policy FW.7	Retain as notified.
S78.003	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Not Stated / Neutral	Accepts that Issue 2 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified.
S78.004	Chapter 3.3: Energy, infrastructure and waste	Energy, infrastructure and waste introductory text	Not Stated / Neutral	Accepts that Chapter 3 introduction text is required to give effect to the NPS-UD but neither supports nor opposes the text.	Delete eighth paragraph of introduction (outdated references to documents that have been superseded).

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S78.005	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Not Stated / Neutral	Accepts that the amendments to the chapter heading and introduction detailed on page 95 of PC1 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.006	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Not Stated / Neutral	Accepts that amendments to Chapter 3.9 Regional Form, Design and Function as summarised in the table on pages 75 and 76 of PC1 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.007	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Not Stated / Neutral	Accepts that Policy CC.4 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified.
S78.008	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Not Stated / Neutral	Accepts that amendments to operative Policy 3 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.009	Chapter 4.1: Regulatory policies	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Not Stated / Neutral	Accepts that the deletion of operative Policy 10 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.
S78.010	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable	Not Stated / Neutral	Accepts that the amendments to operative Policy 11 are required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		energy generation - district plans			
S78.011	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Not Stated / Neutral	Accepts that proposed Policy FW.4 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified.
S78.012	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Not Stated / Neutral	Accepts that the amendments to operative Policy 30 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.013	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Not Stated / Neutral	Accepts that the amendments to operative Policy 31 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.014	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Not Stated / Neutral	Accepts that the amendments to operative Policy 32 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.015	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas -	Not Stated / Neutral	Accepts that the amendments to operative Policy 56 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration			
S78.016	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Not Stated / Neutral	Accepts that the amendments to operative Policy 58 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.017	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Not Stated / Neutral	Accepts that Proposed Policy UD.3 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified.
S78.018	Chapter 4.3: Allocation of responsibilities	General comments - allocation of responsibilities	Not Stated / Neutral	Accepts that replacing the expression 'indigenous biological diversity' with 'indigenous biodiversity' is required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.019	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Not Stated / Neutral	Accepts that the amendments to operative Policy 65 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.020	Chapter 4.4: Non-	Policy 67: Establishing and	Not Stated / Neutral	Accepts that the amendments to operative Policy 67 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	regulatory policies	maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory			
S78.021	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Not Stated / Neutral	Accepts that the amendments to operative Method 14 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.022	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Not Stated / Neutral	Accepts that Proposed Method UD.1 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified.
S78.023	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Not Stated / Neutral	Accepts that Proposed Method FW.2 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified.
S78.024	Chapter 4.5: Methods to implement policies (non-	Method 17: Reducing waste and greenhouse gases emissions from waste streams	Not Stated / Neutral	Accepts that the amendments to operative Method 17 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	regulatory methods)				
S78.025	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Not Stated / Neutral	Accepts that the amendment to operative Method 30 is required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.
S78.026	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 31: Protocol for management of earthworks and air quality between local authorities	Not Stated / Neutral	Accepts that the deletion of operative Method 31 is required to give effect to the NPS-UD but neither supports nor opposes this deletion.	Delete as notified.
S78.027	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 35: Prepare a regional stormwater action plan	Not Stated / Neutral	Accepts that the deletion of operative Method 35 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.
S78.028	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 40: Sign the New Zealand Urban Design Protocol	Not Stated / Neutral	Accepts that the deletion of operative Method 40 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.
S78.029	Chapter 4.5: Methods to implement policies	Method 41: Integrate public open space	Not Stated / Neutral	Accepts that the deletion of operative Method 41 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	(non-regulatory methods)				
S78.030	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 42: Develop visions for the regionally significant centres	Not Stated / Neutral	Accepts that the deletion of operative Method 42 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.
S78.031	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 43: Develop principles for retail activities	Not Stated / Neutral	Accepts that the deletion of operative Method 43 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.
S78.032	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 44: Analysis of industrial employment locations	Not Stated / Neutral	Accepts that the deletion of operative Method 44 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.
S78.033	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 45: Develop principles for rural-residential use and development	Not Stated / Neutral	Accepts that the deletion of operative Method 45 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.
S78.034	Chapter 4.5: Methods to implement policies	Method 46: Develop complex development opportunities	Not Stated / Neutral	Accept that the amendments to operative Method 46 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	(non-regulatory methods)				
S78.035	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 47: Analysis of the range and affordability of housing in the region	Not Stated / Neutral	Accepts that the deletion of operative Method 47 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.
S78.036	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Not Stated / Neutral	Accepts that Proposed Method UD.2 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified.
S78.037	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 56: Assist the community to reduce waste and use water and energy efficiently	Not Stated / Neutral	Accepts that the deletion of operative Method 56 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified.
S78.038	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Natural hazards Anticipated environmental results	Not Stated / Neutral	Accepts that AERs 1 to 5 for Objective 19 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
S78.039	Chapter 5: Monitoring the	Regional form, design and function	Not Stated / Neutral	Accepts that AERs 1 to 7 for Objective 22 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regional Policy Statement and progress towards anticipated environmental results	Anticipated environmental results			
S78.040	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	Accepts, and neither supports nor opposes the following provisions of PC1 that are intended to give effect to the NPS-UD, including: The proposed definitions and amendments to or deletions of the definitions of 'city centre zone', 'complex development opportunities', 'future development strategy', 'high density development', 'hydrological controls', 'key centres', 'marae', 'medium density residential development', 'metropolitan centre zone', 'national grid', 'papakainga', 'regional form', 'regionally significant centres', 'relevant residential zone', 'small scale', 'tier 1 territorial authority', 'tier 1 urban environment', 'urban areas' and 'urban environment'	Retain as notified

S135 Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/ Stebbings Farmlands Ltd

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S135 Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/ Stebbings Farmlands Ltd					
S135.001	Chapter 3.1A: Climate change	General comments - climate change	Oppose	This chapter sets an ambitious target that will place a huge burden on Regional and District Councils. It will work against the objectives introduced into Chapter 3.9 to give effect to the NPS-UD 2020 and RM (Enabling Housing Supply & other Matters) Amendment Act 2021. All new urban development will inevitably increase greenhouse and carbon emissions and have an environmental impact.	Amend the Chapter to achieve better alignment with Chapter 3.9
S135.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	The amendments and new provisions give effect to the NPS-UD 2020 and RM (Enabling Housing Supply & other Matters) Amendment Act 2021 that seeks to increase housing capacity in the urban areas, in particular high density/heights around centres and rapid transport stops to improve housing affordability.	Retain as notified.
S135.003	Chapter 4.1:	Policy CC.2: Travel demand	Oppose	This policy is excessive and represents an additional cost to development and the achievement of other objectives set out under Chapter 3.9 that seek to provide for an increase in	Delete Policy CC.2

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regulatory policies	management plans - district plans		<p>housing supply. It is unrealistic to expect a developer to implement a plan that is reliant on the purchasers of private property to minimise or reduce private vehicle use, and to increase their use of public transport. The new policy is also very unclear as to what the 'specified development threshold' will be therefore the policy is ambiguous and confusing.</p> <p>Overall, requiring Travel Demand Management Plans in District Plans will be ineffective and impossible to enforce; and that efforts to curb carbon in Wellington should focus on incentivising electric car and public transport use through subsidies.</p>	
S135.004	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Oppose	Do not consider a specific policy in the RPS is necessary to support the uptake of zero and low-carbon multi-modal transport infrastructure such as cycle-ways and EV charging network. This is because the market is driving this change in any event and requiring district plans to include objectives, policies and rules is not considered necessary to enable this shift.	Delete Policy CC.3
S135.005	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	Not convinced that this very high level policy and the outcomes described in the explanation will be able to be implemented at a local level i.e. through subdivisions. The requirement for TA's to have objectives/policies and rules is a very broad 'catch-all' wish-list for which no amount of conditions on a subdivision could achieve. It's simply not practical or achievable and whilst it is a noble attempt to solve the climate crisis, there is only some much resource and ability for TA's to implement and achieve the outcomes sought by this policy.	Delete Policy CC.4
S135.006	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	This policy is very broad and seeks to give effects to the NPS Freshwater Management but is unnecessary as the Natural Resources Plan already contains new rules about discharges of stormwater from new urban areas and is already effectively managed. An additional policy is over-kill and unnecessary to achieve outcomes already being achieved through other means.	Delete Policy FW.3
S135.007	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development	Oppose	Developers are already providing stormwater neutrality for their developments and treatment in accordance with WWL guidelines and these are ensured through consent conditions. They are also paying development contributions for stormwater on a catchment and city-wide basis in Wellington and WWL also need to lead by example to attenuate and treat their	Delete Policy FW.4

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		- district plans		stormwater within existing urban environments rather than single out new land developments. The policy is not clear about what constitutes off-site and is ambiguous.	

S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd					
S157.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Oppose	<p>Objective A fails to provide for the characteristics and qualities of well functioning urban environments and fails to provide for regionally significant infrastructure. The life supporting capacity of ecosystems is considered to be a stand-alone consideration, rather than a subset of mana whenua values.</p> <p>In addition, the objective establishes Te Ao Māori as the pre-eminent concept for delivering integrated management with no guidance on how to achieve it. There are no supporting methods, policies or methods about what integrated management guided by Te Ao Māori is.</p> <p>There is a broader concern that Objective A does not fully reflect the diversity of resource management issues and objectives currently provided for in the operative RPS and presented under the following topic headings:</p> <ul style="list-style-type: none"> • Air quality • Coastal environment, including public access • Energy, infrastructure and waste • Fresh water, including public access • Historic heritage • Indigenous ecosystems • Landscape • Natural hazards • Regional form, design and function • Resource management with tangata whenua • Soils and minerals <p>The objective, therefore, potentially prioritises some issues over others that are not referenced in the wording of Objective A, or the three new overarching resource management issues proposed by Proposed Change 1 and appears to pre-empt upcoming legislative change. Including gazettal of the NPS- Indigenous Biodiversity.</p>	Amend Objective A to clearly provide for the characteristics and qualities of well-functioning urban environments and to provide for regionally significant infrastructure, as follows: Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (a) is guided by Te Ao Māori and incorporates mātauranga Māori; and

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S157.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Oppose	<p>Objective A fails to provide for the characteristics and qualities of well functioning urban environments and fails to provide for regionally significant infrastructure. The life supporting capacity of ecosystems is considered to be a stand-alone consideration, rather than a subset of mana whenua values.</p> <p>In addition, the objective establishes Te Ao Māori as the pre-eminent concept for delivering integrated management with no guidance on how to achieve it. There are no supporting methods, policies or methods about what integrated management guided by Te Ao Māori is.</p> <p>There is a broader concern that Objective A does not fully reflect the diversity of resource management issues and objectives currently provided for in the operative RPS and presented under the following topic headings:</p> <ul style="list-style-type: none"> • Air quality • Coastal environment, including public access • Energy, infrastructure and waste • Fresh water, including public access • Historic heritage • Indigenous ecosystems • Landscape • Natural hazards • Regional form, design and function • Resource management with tangata whenua • Soils and minerals <p>The objective, therefore, potentially prioritises some issues over others that are not referenced in the wording of Objective A, or the three new overarching resource management issues proposed by Proposed Change 1 and appears to pre-empt upcoming legislative change. Including gazettal of the NPS-Indigenous Biodiversity.</p> <p>At a minimum, the changes sought in the Fuel Companies' submission should be made.</p>	Split subclause, introduce new standalone subclause, as follows: (c) protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and (d) protects and enhances the life-supporting capacity of ecosystems; and
S157.003	Chapter 3: Resource management issues, objectives and summary of policies and methods	Overarching Objective A	Oppose	<p>Objective A fails to provide for the characteristics and qualities of well functioning urban environments and fails to provide for regionally significant infrastructure. The life supporting capacity of ecosystems is considered to be a stand-alone consideration, rather than a subset of mana whenua values.</p> <p>In addition, the objective establishes Te Ao Māori as the pre-eminent concept for delivering integrated management with no guidance on how to achieve it. There are no supporting methods, policies or methods about what integrated management guided by Te Ao Māori is.</p>	Amend subclause (e) as follows: (e) recognises the role of both natural and physical resources in providing for the provides for and enhances characteristics and qualities of well-functioning urban environments which are supported by both natural and physical resources, including regionally significant infrastructure; and

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	to achieve the objectives in the Regional Policy Statement			<p>There is a broader concern that Objective A does not fully reflect the diversity of resource management issues and objectives currently provided for in the operative RPS and presented under the following topic headings:</p> <ul style="list-style-type: none"> • Air quality • Coastal environment, including public access • Energy, infrastructure and waste • Fresh water, including public access • Historic heritage • Indigenous ecosystems • Landscape • Natural hazards • Regional form, design and function • Resource management with tangata whenua • Soils and minerals <p>The objective, therefore, potentially prioritises some issues over others that are not referenced in the wording of Objective A, or the three new overarching resource management issues proposed by Proposed Change 1 and appears to pre-empt upcoming legislative change. Including gazettal of the NPS-Indigenous Biodiversity.</p> <p>At a minimum, the changes sought in the Fuel Companies' submission should be made.</p>	
S157.005	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Oppose	<p>Objective A fails to provide for the characteristics and qualities of well functioning urban environments and fails to provide for regionally significant infrastructure. The life supporting capacity of ecosystems is considered to be a stand-alone consideration, rather than a subset of mana whenua values.</p> <p>In addition, the objective establishes Te Ao Māori as the pre-eminent concept for delivering integrated management with no guidance on how to achieve it. There are no supporting methods, policies or methods about what integrated management guided by Te Ao Māori is.</p> <p>There is a broader concern that Objective A does not fully reflect the diversity of resource management issues and objectives currently provided for in the operative RPS and presented under the following topic headings:</p> <ul style="list-style-type: none"> • Air quality • Coastal environment, including public access • Energy, infrastructure and waste • Fresh water, including public access • Historic heritage • Indigenous ecosystems • Landscape • Natural hazards 	Delete subclause (d) as follows: (d) recognises the dependence of humans on a healthy natural environment; and

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				<ul style="list-style-type: none"> • Regional form, design and function • Resource management with tangata whenua • Soils and minerals <p>The objective, therefore, potentially prioritises some issues over others that are not referenced in the wording of Objective A, or the three new overarching resource management issues proposed by Proposed Change 1 and appears to pre-empt upcoming legislative change. Including gazettal of the NPS-Indigenous Biodiversity.</p> <p>At a minimum, the changes sought in the Fuel Companies' submission should be made.</p>	
S157.006	Chapter 3.1A: Climate change	Objective CC.6	Support in part	<p>It is not only the resilience of communities and the natural environment that need strengthened resilience against the adverse effects of climate change. Infrastructure, including regionally significant infrastructure is particularly vulnerable to climate change effects and represents considerable financial investment that is critical to the resilience of communities. It warrants explicit mention in Objective CC.6.</p>	<p>Amend Objective CC.6 to acknowledge the need for increased resilience of infrastructure, including regionally significant infrastructure, against the adverse effects of climate change. This could be achieved by making the following changes: Objective CC.6: Resource management and adaptation planning increase the resilience of communities, infrastructure (including regionally significant infrastructure) and the natural environment to the short, medium, and long-term effects of climate change.</p>
S157.007	Chapter 3.8: Natural hazards	Objective 20	Oppose	<p>The anticipated environmental results for Objective 20 are identified as being:</p> <ol style="list-style-type: none"> 1. There is no increase in the risk from natural hazards as a result of subdivision, use or development (including mitigation works). 2. Where hazard mitigation and climate change measures are employed, there is a greater number and range of soft engineered measures used, that achieve integrated management and broad environmental outcomes. <p>The Objective focuses on 'natural hazard and climate change mitigation and adaptation activities'. There is significant uncertainty in the definitions of 'climate change mitigation' and 'climate change adaptation' and the types of activities that will fall into these categories. However, they appear unlikely to apply to all subdivision, use or development, in which case the Objective will not achieve the first anticipated environmental result. The wording of existing Objective 20 appears likely to be more effective at achieving the first anticipated environmental result and provides greater certainty of the scope and intent of the objective.</p>	<p>Amend proposed Objective 20 to provide greater certainty as to the scope and intent, as described in the Anticipated Environmental Results for the objective. This could be achieved by retaining the wording of existing Objective 20 as follows, or making changes to the same effect: Objective 20: Natural hazard and climate change mitigation and adaptation activities minimise the risks from natural hazards Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events and seek to minimise impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity.</p>

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				The term 'minimise' is considered to be too strong unless it is defined as per the pNRP.	
S157.008	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	Objective 22 appropriately recognises the development of infrastructure as key to achieving well-functioning urban environments as well as the need to provide for commercial and industrial development in appropriate locations. Clause (e), however, is unnecessary as places additional weight on the objectives of the RPS relating to air, land, freshwater, coast and biodiversity, giving them additional weight for urban development proposals over and above other RPS objectives that are not listed.	Retain the intent of Objective 22, but delete clause (e) as follows: (e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and
S157.009	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Nature based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment. Nor is it clear how nature-based solutions could perform the role of 'traditional infrastructure' such as regionally significant bulk fuel supply infrastructure.	<p>Amend Policy CC.7 to recognise the nature-based solutions may not be practicable in all situations and will not necessarily be able to perform the role of regionally significant infrastructure. This could be achieved by making changes along the following lines: Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans</p> <p>District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, where practicable.</p> <p>Explanation Development and infrastructure planning and design should include nature-based solutions where practicable as standard practice, including green infrastructure, green spaces, and environmentally friendly design elements, to manage issues such as improving water quality and natural hazard protection. Nature-based solutions can assist in perform the roles of traditional infrastructure, while also building resilience to the impacts of climate change and providing benefits for indigenous biodiversity and community well-being.</p>
S157.011	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable	Oppose	The reference to 'low and zero carbon regionally significant infrastructure' creates a third tier of infrastructure, which potentially undermines the term regionally significant infrastructure and is not supported. Recognition and provision needs to be made for investment in	Amend Policy 7 to ensure appropriate recognition and provision for all types of regionally significant infrastructure. This could be achieved by making changes along the following lines: (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and

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		energy and regionally significant infrastructure - regional and district plans		all existing regionally significant infrastructure, including infrastructure that is not low or zero carbon, such as regionally significant bulk fuel supply infrastructure. There will continue to be a role for such infrastructure, including in terms of diversity in energy sources, at least during a transition to low carbon energy provision. The preference for low or zero carbon energy provision in clause (a)(iii) could potentially undermine the ability to maintain the security of supply provided by existing carbon based infrastructure networks and this wording is not supported.	zero carbon regionally significant infrastructure including: (iii) people have access to energy, and preferably including low or zero carbon energy, so as to meet their needs; and
S157.012	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p>	Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines: Delete subclause (c) (c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;
S157.013	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as</p>	Delete subclause: (e) avoiding the loss of river extent and values;

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				drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.	
S157.014	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p>	<p>Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines</p> <p>New subclause(s) appropriate provision is made for temporary dewatering activities necessary for construction or maintenance.</p>
S157.015	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	<p>It will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme. For example, under the PNRP, all areas in the coastal marine area and the beds of lakes and rivers are considered high hazard risk areas. There is existing development in these areas, for which provision needs to be made, at least, for its continued operation and maintenance. Of particular relevance are stormwater outfalls to the coast and stream corridors, and wharflines between port facilities in the CMA and bulk storage tanks, which traverse locations meeting the PNRP definition of 'high hazard risk areas'.</p> <p>Further, provision is made in both plans for certain new activities to occur in these locations. It is inappropriate to prevent any and all further development in high hazard areas. In the case of regionally significant infrastructure networks, there will be a need for infrastructure to cross areas identified as high or extreme hazard, such as stream and river corridors, in order to deliver services to communities on the other side.</p>	<p>Amend Policy 29 to recognise that it will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme, particularly where there is existing development or a need for infrastructure to locate in high hazard areas, such as stormwater outfalls to the coast or stream corridors. This could be achieved by making following changes or to the same effect:</p> <p>d) include objectives, policies and rules to avoid inappropriate subdivision, use of development and hazard sensitive activities where the hazards and risks are assessed as high to extreme,</p>
S157.016	Chapter 4.2: Matters to	Policy IM.2: Equity and inclusiveness	Oppose	There is significant uncertainty in the wording of policy IM.2 and how many of the terms might be interpreted in any given situation. For example, it is unclear how this may be applied in	Delete Policy IM.2 in its entirety.

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	be considered	s - consideration		a situation where consent is required for maintenance or upgrade of existing regionally significant infrastructure located in an environmentally or culturally sensitive area. The policy should be deleted on the basis of uncertainty and an inability to apply on a consistent basis.	
S157.017	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose	<p>Not all regionally significant infrastructure is, itself, able to contribute to a reduction in greenhouse gases. While the broader objective of moving towards a carbon neutral economy is acknowledged, there will be continued reliance on the Fuel Companies' regionally significant bulk fuel supply infrastructure, during that transition and the role it plays in ensuring security of energy supply and diversity in energy sources. Opportunities may be available for transitioning existing infrastructure away from hydrocarbons and towards lower-carbon options such as biofuels. However, in the interim, the critical role of infrastructure in supporting the regional economy needs to be recognised and appropriate provision made for the ongoing operation, maintenance and upgrade of infrastructure. The policy already specifically recognises energy generated from renewable sources. It is unnecessary to create a further distinction between regionally significant infrastructure on the basis that it is able to contribute to a reduction in greenhouse gas emissions. The addition to clause (a) is, therefore, opposed.</p> <p>The wording of the policy explanation as it currently appears in the operative RPS appropriately recognises the benefits of renewable energy and regionally significant infrastructure and its role in enabling communities to provide for their social, economic, cultural and environmental wellbeing. In contrast, the wording proposed through Change 1 focuses on the adverse effects of renewable energy and regionally significant infrastructure and is opposed.</p>	<p>Amend Policy 39 by retaining the wording used in the operative RPS, Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to: (a) the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions; and</p> <p>....</p> <p>Explanation Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions. The benefits of energy generated from renewable energy resources include:</p> <p>• Security of and the diversification of our energy sources • Reducing our dependency on imported energy resources - such as oil, natural gas and coal • Reducing greenhouse gas emissions • Contribution to the national renewable energy target The benefits are not only generated by large scale renewable energy projects but also smaller scale, distributed generation projects. The benefits of regionally significant infrastructure include: • People and goods can efficiently and safely move around the region, and to and from • Public health and safety is maintained through the provision of essential services - such as potable</p>

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					<p>water and the collection and transfer of sewage or stormwater• People have access to energy to meet their needs• People have access to telecommunication servicesEnergy generation from renewable energy and regionally significant infrastructure (as defined in Appendix 3) can provide benefits both within and outside the region.Renewable energy generation and regionally significant infrastructure can also have adverse effects on the surrounding environment and community. These competing considerations need to be weighed on a case by case basis to determine what is appropriate in the circumstances.When considering the benefits from renewable energy generation, the contribution towards national goals in the New Zealand Energy Strategy (2007) and the National Energy Efficiency and Conservation Strategy (2007) will also need to be given regard.Potential significant sites for development of Wellington region's marine and wind resources have been identified in reports 'Marine Energy - Development of Marine Energy in New Zealand with particular reference to the Greater Wellington Region Case Study by Power Projects Ltd, June 2008' and 'Wind Energy - Estimation of Wind Speed in the Greater Wellington Region, NIWA, January 2008'.Policy 39(a) shall cease to have effect once policy 9 is given effect in a relevant district or regional plan.Policy 39(b) shall cease to have effect once policy 8 is given effect in a relevant district or regional plan.</p>
S157.018	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic	Amend Policy 40 to recognise that enhancement of water bodies and freshwater ecosystems may not be necessary or practicable in all cases and that the policy focus is on the quality of fresh water rather than coastal water. This could be achieved by making changes along the following lines:

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		and well-being of water bodies and freshwater ecosystems - consideration		ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	Policy 40: Maintaining Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration
S157.019	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	Amend Policy 40 to recognise that enhancement of water bodies and freshwater ecosystems may not be necessary or practicable in all cases and that the policy focus is on the quality of fresh water rather than coastal water.(a) that water quality, flows and water levels and aquatic habitats of water bodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of waterbodies and the health and wellbeing of freshwater ecosystems;
S157.020	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of	Delete subclause (b) as follows: (b) that, requiring as a minimum, water quality in the coastal marine area is to be managed in a way that protects and enhances the health and well-being of waterbodies and the health and wellbeing of marine ecosystems.

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				'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	
S157.021	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The implications of the proposed policy wording are unclear as the environmental outcomes, target attribute states and suspended sediment limits referred to have not been set. It is uncertain whether those thresholds will be appropriate in the context of short term activities such as construction earthworks, particularly in the context that clause b sets an avoidance approach. For example, dewatering discharges can result in a short term exceedance of suspended sediment thresholds during the first flush, even where best practice is applied to the management of dewatering activities. This is commonly accepted across the country as appropriate, subject to appropriate conditions and adoption of best practice management approaches. Complete avoidance of such discharges is unlikely to be practicable.	<p>Amend Policy 41 by retaining the wording used in the operative RPS as follows: Policy 41: Controlling Minimising the effects of earthworks and vegetation disturbance - consideration</p> <p>When considering an application for a resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by to minimise:(a) erosion; and(b) considering whether the activity will achieve environmental outcomes and target attribute states; silt and sediment runoff into water, or onto or into land that may enter water, so that healthy aquatic ecosystems are sustained; and(b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.</p>
S157.022	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The implications of the proposed policy wording are unclear as the environmental outcomes, target attribute states and suspended sediment limits referred to have not been set. It is uncertain whether those thresholds will be appropriate in the context of short term activities such as construction earthworks, particularly in the context that clause b sets an avoidance approach. For example, dewatering discharges can result in a short term exceedance of suspended sediment thresholds during the first flush, even where best practice is applied to the management of dewatering activities. This is commonly accepted across the country as appropriate, subject to appropriate conditions and adoption of best practice management approaches. Complete avoidance of such discharges is unlikely to be practicable.	<p>Amend Policy 41 by retaining the wording used in the operative RPS,</p> <p>Explanation An area of overlapping jurisdiction between Wellington Regional Council and district and city councils is the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on erosion prone land in rural areas and many small scale earthworks in urban areas - such as driveways and retaining walls - can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to minimise erosion and silt and sedimentation effects associated with these activities. Minimisation requires effects to be reduced to the extent reasonably achievable whilst recognising</p>

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					<p>that erosion, siltation and sedimentation effects can not always be completely avoided. This policy provides for consideration of earthworks and vegetation disturbance to minimise erosion and sediment runoff prior to plan controls being adopted by regional and district plans in accordance with policy 15. This policy shall cease to have effect once method 31 is implemented and policy 15 is given effect to in regional and district plans. Policies 15 and 41 are to ensure that Wellington Regional Council and district and city councils integrate the control earthworks and vegetation disturbance in their regional and district plans. Method 31 is for Wellington Regional Council and district and city councils to develop a protocol for earthworks and erosion from vegetation disturbance. The protocol will assist with implementation of policies 15 and 41. Some activities - such as major road construction - are likely to require resource consents from both Wellington regional council and district or city councils, which will work together to control the effects of the activity. Vegetation disturbance includes harvesting plantation forestry.</p> <p><i>[Note: Submission related to prior submission point S157.021]</i></p>
S157.023	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; 	Amend Policies 14, FW.3 and 42 to recognise that the absolute thresholds set within the policy will not necessarily be achievable in all situations and there is a need for an element of discretion.

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				<ul style="list-style-type: none"> - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle,</p>	

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S157.024	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p> <p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be</p>	Amend subclause (c) Require the management control of both land use and discharge effects from the use and development of land on freshwater and the coastal marine area;

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.025	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for</p>	Amend. (d) Identify how to Achieve the target attribute states set for the catchment;

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.026	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; 	<p>Amend.</p> <p>(e) Require the development, including stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan to the extent practicable;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>- Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.027	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on	Oppose	Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the	Amend. (f) Require that urban development is designed and constructed using the principles of Water Sensitive Urban Design applicable to the development type;

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		freshwater and the coastal marine area - regional plans		<p>consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges,</p>	

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.028	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example</p>	(g) Require that urban development is located and designed to minimise the extent and volume of earthworks to the extent practicable and to follow, to the extent practicable, existing land contours;

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.029	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not</p>	(h) Require that urban development is located and designed to reduce the potential for adverse effects on protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.030	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, 	(j) Require hydrological controls to avoid-reduce adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>earthworks and vegetation clearance;</p> <ul style="list-style-type: none"> - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p>	

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.031	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of</p>	<p>(k) Require subdivision, use and development to adopt stormwater quality management measures that will minimise the generation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater to the extent practicable; and</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p> <p>[Note: Submission references to prior submission point S157.023]</p>	
S157.032	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any</p>	<p>amend subclause.</p> <p>(j) Require that urban development is located and designed to minimise the extent and volume of earthworks to the extent practicable and to follow, to the extent practicable, existing land contours;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.033	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; 	<p>amend subclause.</p> <p>(k) Require that urban development is located and designed to reduce the potential for adverse effects on protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<ul style="list-style-type: none"> - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle,</p>	

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S157.034	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p> <p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be</p>	<p>amend subclause (m) Require hydrological controls to avoid reduce adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.035	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for</p>	<p>amend subclause (g) The ability for Require that the development, including stormwater discharges, earthworks and vegetation clearance to meets any limits set in a regional plan and the effects of any exceedances;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.036	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; 	<p>amend subclause</p> <p>(h) The extent to which Require that urban development is located and designed and constructed using the principles of Water Sensitive Urban Design;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>- Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.037	Chapter 4.2: Matters to	Policy 42: Effects on freshwater and the	Oppose	Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the	amend subclause (i) The extent to which Require that urban development

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	be considered	coastal marine area from urban development - consideration		<p>consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges,</p>	<p>is located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.038	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example</p>	<p>amend subclause</p> <p>(j) The extent to which Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.039	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain. The policies set strict requirements to be achieved, that do not</p>	<p>amend subclause</p> <p>(k) The extent to which Require hydrological controls to avoid reduce adverse effects of stormwater runoff quantity (flows and volumes) and maintain, to the extent practicable, on natural stream flows</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.040	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development -	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, 	<p>amend subclause</p> <p>(l) The extent to which subdivision, use and development stormwater quality management that will minimise the generation of contaminants in stormwater, and maximises, to the extent practicable, the removal of contaminants from stormwater;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration		<p>earthworks and vegetation clearance;</p> <ul style="list-style-type: none"> - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p>	

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.	
S157.041	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of</p>	<p>amend subclause.</p> <p>(m) Require The provision of riparian buffers for all waterbodies and avoid piping of rivers;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.</p> <p>Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S157.042	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	<p>The intent of the policy is supported. However, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p> <p>Editorial changes are required to the wording of clauses (f) and (g) to ensure they relate appropriately to the amended chapeau, which requires Te Mana o te Wai to 'be given effect to'.</p>	<p>amend subclause. (f) requiring the consent holders are required to measure and report the actual amount of water taken; and</p>
S157.043	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	<p>The intent of the policy is supported. However, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p> <p>Editorial changes are required to the wording of clauses (f) and (g) to ensure they relate appropriately to the amended</p>	<p>amend subclause (g) requiring the consent holders are required to adopt water conservation and demand management measures and demonstrate how water will be used efficiently; and</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				chapeau, which requires Te Mana o te Wai to 'be given effect to'.	
S157.044	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	The intent of the policy is supported. However, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits. Editorial changes are required to the wording of clauses (f) and (g) to ensure they relate appropriately to the amended chapeau, which requires Te Mana o te Wai to 'be given effect to'.	introduce new subclause. (i) appropriate provision is made for temporary dewatering activities necessary for construction or maintenance.
S157.045	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Oppose	As with Policy 29, the direction in clause (g) to avoid subdivision, use or development in areas where hazards and risks are assessed as high to extreme is opposed. It will not be possible or necessary to entirely avoid all subdivision, use or development such areas, particularly where maintenance or minor upgrade type work is required to existing activities in these areas or where there is an operational or functional need for an activity to locate in or traverse an area at risk from natural hazards. Further, the acceptability of risk for some activities will vary depending on the hazard involved e.g. flooding, coastal erosion, rockfall, earthquake etc. This is recognised in the PNRP and district plans where provision is made for certain activities to occur in areas where natural hazards and risks are assessed as high to extreme, such as stream corridors and areas in the current coastal hazard inundation and erosion overlays.	Amend Policy 51 to recognise that it will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme, and to ensure appropriate provision is made for regionally significant infrastructure to be maintained and to traverse such locations. This could be achieved by making the following changes or to the same effect: (g) avoiding inappropriate subdivision, use, or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme;
S157.046	Appendix 3: Definitions	Hazard sensitive activity	Oppose	The terms 'hazardous facilities and major hazardous facilities' are not defined. It is, therefore, uncertain what types of facilities will be considered 'hazard sensitive activities' and subject to the proposed policy framework, which as currently drafted, requires complete avoidance of such activities in areas identified as at high or extreme risk of natural hazard. An avoidance approach is not appropriate, particularly where: - the acceptability of risk will vary depending on the hazard involved e.g. flooding, coastal erosion, rockfall, earthquake etc; - there is a need to continue to operate, maintain or upgrade existing facilities; or - there is an operational or functional need for an activity to	Amend the definition of hazard sensitive activity to remove 'hazardous facilities and major hazardous facilities', on the basis that these terms are not defined and it is uncertain what types of facilities will be considered 'hazard sensitive activities' and that the policy framework as currently drafted, requires complete avoidance of such activities and does not make appropriate provision for existing facilities, or activities that may have an operational or functional need to locate in a hazard sensitive area, Hazard sensitive activity Means any building that contains one or more of the following

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				<p>locate in or traverse an area at risk from natural hazards. Many District Councils within the region have now removed provisions relating to hazardous facilities from their district plans, consistent with RLLA 2017, which removed the control of hazardous substances as an explicit function for councils. This reflects the high degree of control already in place in relation to these activities under other legislation, including under the Hazardous Substances and New Organisms Act, the Health and Safety and Work Act and WorkSafe regulations. This includes with respect to managing natural hazard risk. Underground fuel storage tanks, for example, are not generally at risk during a flood event and compliance with industry best practice would, in any case, require the design of service station or truck stop facilities to maintain their integrity and function during natural hazard events. Further, the resilience of these facilities through the 2010 and 2011 Christchurch earthworks, with no simultaneous compartment failures and no significant product losses, demonstrates the resilience of these structures to earthquake risk.</p>	<p>activities:</p> <p>.... hazardous facilities and major hazardous facilities</p>
S157.047	Appendix 3: Definitions	Maintain /maintained /maintenance: (in relation to indigenous biodiversity)	Oppose	<p>Distinct definitions of restoration and enhancement are included and infer improvement of the existing state. It is inappropriate to incorporate these terms in the defined concept of 'maintenance'. If restoration or enhancement are appropriate in relation to development within a certain ecosystem or habitat that should be addressed at a policy level.</p>	<p>Amend the definition of maintain / maintained / maintenance by deleting the reference to restoration and enhancement, as follow:</p> <p>Maintain /maintained /maintenance (in relation to indigenous biodiversity)</p> <p>.... The maintenance of indigenous biodiversity may also require the restoration or enhancement of ecosystems and habitats.</p>
S157.048	Appendix 3: Definitions	Regionally significant infrastructure	Support	<p>That part of the definition of Regionally Significant Infrastructure relating to petroleum pipelines and associated fittings, appurtenances, fixtures or equipment will apply to wharflines and bunkerlines and associated equipment and bulk storage tanks and is supported.</p> <p>The clause relating to commercial port areas should, however, be amended to remove the reference to 'the Lambton Harbour Area'. This reference was not included in the mediated wording of the definition of regionally significant infrastructure in the PNRP as confirmed by Environment Court consent order dated 1 July 2021. It effectively excludes the bulk fuel supply infrastructure located at Seaview in Lower Hutt and those located at Kaiwharawhara and is opposed.</p>	<p>Retain the definition of Regionally Significant Infrastructure to the extent it applies to petroleum pipelines and associated fittings, appurtenances, fixtures or equipment, but amend that part of the definition relating to commercial port areas to ensure the bulk fuel supply infrastructure where it is associated with port activities is clearly recognised as regionally significant infrastructure, as follows: Regionally significant infrastructure includes:</p> <ul style="list-style-type: none"> • pipelines for the distribution or transmission of natural or manufactured gas or petroleum, including any associated fittings, appurtenances, fixtures or equipment. • ... • Commercial Port Areas and infrastructure associated with Port related activities in the Lambton Harbour Area within

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					Wellington Harbour (Port Nicholson) and adjacent land used in association with the movement of cargo and passengers and including bulk fuel supply infrastructure, and storage tanks for bulk liquids, and associated wharflines
S157.049	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	RPS Change 1 proposes to introduce a number of policies relating to 'transport infrastructure' and its role in contributing to a reduction in greenhouse gas emissions. The term 'transport infrastructure' is not defined, such that it is unclear what activities will be subject to the associated policy framework. The expectation is that these provisions will apply to 'structures for transport on land by cycleways, rail, roads, walkways, or any other means', as per the wording of the RMA definition of 'infrastructure'. Would not support the application of the 'transport infrastructure' policies to service stations, truck stops or bulk fuel supply infrastructure. As such, and to improve certainty around the scope and application of the 'transport infrastructure' policies, seek the inclusion of a new definition of 'transport infrastructure'. Alternatively, seek consequential amendments to the 'transport infrastructure' policies (being policies CC.1, CC.9 and CC.11) to clarify that they do not apply to service stations, truck stops or bulk fuel supply infrastructure.	Insert a new definition of Transport Infrastructure to provide clarity around the scope and application of the proposed new policies that apply to Transport Infrastructure. This could be achieved by inserting a new definition along the following lines, or by amending policies CC.1, CC.9 and CC.11 in a way that clarifies the policies do not apply to service stations, truck stops or bulk fuel supply infrastructure: Transport Infrastructure Structures for transport on land by cycleways, rail, roads, walkways, or any other means.

S90 Bronwyn Bell

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S90 Bronwyn Bell					
S90.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support provisions ensuring that more homes do not result in more emissions. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils - of all stripes - to do everything they possibly can to get good intensification for growth, rather than greenfield. Not opposed to greenfield that can pass the test of being founded on high accessibility, not mobility, and whose movement network is very sustainable.	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.
S90.003	General comments	General comments - overall	Support	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools than TDM plans. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive, rather than diluted.

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S90.005	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Request councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing "density done well" by intensification.
S90.006	General comments	General comments - overall	Support	Supports the provisions for uplifting Te Mana o te Wai	Retain, refine and enhance provisions.
S90.007	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Retain, refine and enhance provisions.
S90.008	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support provisions relating to indigenous biodiversity.	Retain, refine and enhance provisions.

25 Carterton District Council

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S25 Carterton District Council					
S25.001	Chapter 3.1A: Climate change	Objective CC.1	Support	Objective supported.	Retain the objective.
S25.002	Chapter 3.1A: Climate change	Objective CC.2	Support in part	While CDC supports the intent of this objective, the RPS does not provide sufficient direction on how this objective is achieved or implemented. For example, it is uncertain how consistency with this objective would be addressed in a district plan or as part of assessment of a consent application. Additional methods or clear non-statutory guidance would assist with ensuring that this objective is effectively implemented and achieved.	Provide better guidance on how this objective and related policies should be implemented by district councils.
S25.003	Chapter 3.1A:	Objective CC.3	Oppose	While CDC supports the RPS providing clear goals for emission reduction, it is concerned that there will be inequities in the way these targets are intended to be met. As CDC is a	Provide better guidance on how the objective will be implemented equitably.

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	Climate change			predominantly rural environment, with the town functioning as a rural service area, the transport emissions targets are potentially unrealistic for Carterton and the wider Wairarapa. It is unclear how Objective CC.3 is consistent with Objective CC.2 about fairly sharing costs and benefits.	
S25.004	Chapter 3.1A: Climate change	Objective CC.3	Oppose	CDC is also very concerned that agriculture is included in this policy. The CCRA excludes biogenic methane from the overall 2030 and 2050 targets, and sets a separate target for this. CDC requests reference to 'agriculture' is removed from this objective, and that further information on alignment with government targets is provided for this objective.	Remove 'agriculture' from the objective.
S25.005	Chapter 3.1A: Climate change	Objective CC.3	Oppose	CDC is concerned that the targets set in the RPS go well beyond those in the Climate Change Response (Zero Carbon) Amendment Act 2019. The Paris Agreement (incorporated into the CCRA Act 2019) seeks to reduce greenhouse gas emissions by 30% below the 2005 level, not the 2019 level, by 2030.	Amend 'net zero emissions' to use consistent language that is appropriate in an RMA framework.
S25.006	Chapter 3.1A: Climate change	Objective CC.5	Support in part	CDC supports the increase in permanent forest across the region, but is concerned that the Wairarapa will be disproportionately affected by an increase in carbon farming. CDC seeks early involvement of a regional forest spatial plan to ensure that Carterton district is not expected to provide inequitable areas of forestry.	Retain the policy. [CDC] Seeks early engagement with GWRC in the development of a regional forest spatial plan.
S25.007	Chapter 3.1A: Climate change	Objective CC.6	Support	CDC supports this objective and notes that the draft Wairarapa Combined District Plan will give effect to this.	Retain the policy.
S25.008	Chapter 3.1A: Climate change	Objective CC.7	Support	CDC supports a partnership approach with the community in mitigating and adapting to climate change. Funding will need to be allocated for this.	Ensure that funding is allocated to the implementation of this objective.
S25.009	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose	As stated above, CDC considers that it is inappropriate to apply the Freshwater Planning Process to provisions where freshwater is not the primary issue. CDC therefore requests that the FPP is only used for provisions in this chapter, and all other Plan Change 1 amendments are addressed via the Schedule 1 process.	Use the Freshwater Planning Process for the provisions in this chapter only, where freshwater is the primary issue, and use the Schedule 1 process for all remaining provisions.
S25.010	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	CDC supports the inclusion of these statements, but it is unclear what purpose they serve in the RPS - better linkages with other objectives or policies would be useful to better understand how to give effect to the statements.	(Submission point in reference to - Rangitāne o Wairarapa and Kahungunu ki <i>Wairarapa Table 4, Chapter 3.4</i>) Provide better linkages between these statements and the rest of the RPS.

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S25.012	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	The chapter introduction refers extensively to urban environments, as defined in the NPS-UD. However there is no mention of other urban areas that do not meet the definition of urban environments - for example, Carterton. Some introductory text that recognises other urban areas would be useful.	Add some introductory text that recognises 'urban areas', not just 'urban environments', and describes their role in the regional form, design and function of the Wellington region.
S25.013	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	CDC seeks an objective that specifically provides for urban areas which are not urban environments. This would support Policy 31 in particular.	Add an objective that provides direction for urban areas - those areas that are within urban zones, but not part of 'urban environments'.
S25.014	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Oppose	CDC considers that the approach of scattering climate change, indigenous ecosystems and freshwater policies throughout Chapter 4.1 makes the plan very difficult to use.	Re-label policies so that numbering is continuous, or group the CC, FW and IE policies together.
S25.015	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>While CDC supports the intent of this policy, applying the requirements in (a)-(c) to all new and altered transport infrastructure does not allow for the scale or type of the alterations to be considered.</p> <p>For example, an alteration to transport infrastructure could comprise a new roundabout, or creation of a heavy vehicle bypass - there are many types of alterations where consideration of these matters would not be appropriate, either because the alteration is minor in nature, or because it provides greater efficiency for the wider transport network - but not necessarily for zero- or low- carbon modes. While there might be flow-on effects (e.g. a heavy vehicle bypass might make other urban streets more attractive for active modes), these would not necessarily meet the criteria in (b) and (c).</p> <p>CDC also requests that the policy is amended so that it applies in urban areas only.</p>	<p><i>[Amendment sought applies to Policy CC.9, Chapter 4.2]</i></p> <p>Amend the policy so that it does not apply to small-scale transport infrastructure alterations and does not apply outside urban areas.</p>
S25.016	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	CDC supports this policy and particularly the 'enable' approach to encourage zero- and low-carbon transport infrastructure.	Retain this policy.
S25.017	Chapter 4.1:	Policy CC.4: Climate resilient	Support in part	CDC supports the intent of this policy but considers that referring to both 'urban areas' and 'urban environments' makes	<i>[Note: below is a C+P of submitters amendments, this does not align with their reasoning which sought the</i>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regulatory policies	urban areas - district and regional plans		the application of the policy ambiguous. Amendments are suggested so that it refers to 'urban areas' only.	<p><i>replacement of 'urban environments' with 'urban areas']</i></p> <p><i>Amend as follows:Policy CC.4: Climatedesilient urban areas -district and regional plansDistrict andregional plans shall include policies, rules and/or methods to provide forclimate-resilient urban areas by providing for actions and initiativesdescribed in Policy CC.14 which support delivering the characteristics and qualitiesof well-functioning urban environments.ExplanationPolicy CC.4 directs regional and district plans includerelevant provisions to providefor climate resilient urban areas. For the purposes of this policy,climate-resilient urban areasmean urban environments that have the ability towithstand:</i></p> <ul style="list-style-type: none"> <i>• Increased temperatures and urban heat island</i> <i>• Increased intensity of rainfall and urbanflooding</i> <i>• Droughts and urban water scarcity and security</i> <i>• Increased intensity of wind, cold spells,landslides, fire, and air pollutionThe policy is directly associated with Policy CC.14 which provides further directionon actions and initiatives to provide for climate resilient urban areas. It isnoted that other policies of this RPS also provide for actions and initiatives to deliver climate resilient urban areas, includingPolicy FW.3.</i>
S25.018	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>While no methods are included, and the policy applies to regional plans only, this policy appears to set the initial framework for RMA plans targeting agricultural emissions. CDC is concerned with the implications of this, and with the interaction or conflict it might have with other agricultural emission reduction measures.</p> <p>Land use management largely sits with district plans, and therefore it is unclear why this only applies to regional plans, and what flow-on effects there might be for district plans.</p> <p>CDC wishes to understand how this reduction aligns with Government policy in the area. It is unclear how fair and reasonable reductions should be calculated and consistently applied in consenting.</p>	Delete the policy.

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				<p>CDC requests that this policy is deleted, and the matter reconsidered as part of any future plan change process if that is appropriate.</p>	
S25.019	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	<p>CDC supports this policy, and particularly that it requires the avoidance of plantation forestry on highly erodible land.</p> <p>CDC does have concerns that the Wairarapa will be expected to provide a greater proportion of permanent forest cover than other areas because it has larger areas of rural land. When the driver for increased afforestation is achieving net zero carbon emissions, it appears inequitable that the Wairarapa might suffer from greater afforestation when there is a lack of emission reduction in other areas. CDC seeks that the policy reflect that offset should occur in the area where emissions are generated.</p> <p>While permanent forest, and particularly indigenous permanent forest, has significant benefits, it is not productive and therefore the Wairarapa may bear an unreasonable burden from this policy. CDC requests that the policy is amended to reflect that permanent forest should not be planted on productive land.</p>	<p>Amend the policy so that permanent forest is not encouraged on highly productive land.</p> <p>Provide a more supportive policy framework for this when a variation is prepared to respond to the NPS-HPL.</p>
S25.020	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	<p>CDC supports this policy.</p> <p>It goes some way to addressing CDC's concerns that the Wairarapa will be expected to act as a 'carbon sink' for the Wellington region via extensive afforestation.</p> <p>This policy makes it clear that afforestation should not be a primary method for achieving net-zero emissions. As stated above, any offsetting should be applied equitably across the region and should occur in the local area in which emissions are generated.</p>	Retain this policy.
S25.021	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional	Support in part	<p>While CDC supports the intent of this provision, the references to 'low or zero carbon' activities do not make sense here, and there are other terms that can more effectively convey the requirements of this policy.</p> <p>It is unclear what 'low and zero carbon regionally significant infrastructure' might include, and how this might be assessed.</p> <p>Replacing 'Low or zero carbon energy' with 'renewable energy' provides greater clarity (noting that the vast majority of residents access their energy from the National Grid or non-</p>	<p>Amend the explanation so that it is clear what is meant by 'low and zero carbon regionally significant infrastructure'; or alternatively, remove the proposed additions to (a).</p> <p>Amend (a)(i) as follows: <i>(i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to public transport, active transport or low or zero carbon multi modal travel modes;</i></p> <p>Amend (a)(iii) as follows:</p>

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		and district plans		local sources of gas and therefore this clause has limited effect).	(iii) people have access to energy, and preferably renewable low or zero carbon energy, so as to meet their needs; and
S25.022	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	CDC supports this policy and notes that the draft Wairarapa Combined District Plan uses a different approach to defining small- and community-scale renewable electricity generation. The WCDP approach generally exceeds what is required by these amendments.	Retain the policy.
S25.023	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	<p>While CDC supports a more holistic consideration of the effects of earthworks and vegetation clearance, it is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m²).</p> <p>It is unclear how policies, rules and methods, and subsequent assessment of land use consent applications, should be applied in a district plan context. CDC does not have the capacity to undertake an assessment of the matters described in this policy as they do not relate to core territorial authority functions, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks.</p> <p>Policies, rules and methods addressing these matters are more appropriate in a regional plan and therefore CDC requests that references to district plans are removed from this policy.</p>	Remove reference to district plans from this policy, so that the requirements only apply to regional plans.
S25.024	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	<p>CDC generally supports this policy.</p> <p>However, CDC questions the efficiency and effectiveness of point (a), particularly a regulatory approach in District Plans. We understand the intent of this point is to require the installation of water efficient appliances, showers and toilets. However, the costs of compliance and enforcement would be high, in particular to ensuring ongoing compliance.</p> <p>CDC considers other (non-regulatory) methods such as water meters and education on efficient use of water are more effective and efficient.</p>	Delete point (a) from Policy FW.2.

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S25.025	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>CDC opposes this policy, as it goes far beyond what is required by the NPS-FM. CDC does not have the in-house capability to provide an assessment against these matters, and considers that most of these matters sit more comfortably within the regional council functions.</p> <p>CDC requests that the policy is amended so that it is consistent with section 3.5(4) of the NPS-FM, but does not go beyond the ambit of that provision.</p>	Amend the policy so that it addresses only those matters addressed in section 3.5(4) of the NPS-FM.
S25.026	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Oppose	CDC opposes this policy and considers that the RPS should not include policies that dictate requirements for particular financial contributions in district plans. The appropriate mechanism for GWRC to suggest such a policy is via the Schedule 1 process for the Wairarapa Combined District Plan.	Delete this policy.
S25.027	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	CDC opposes the amendment to this policy requiring that indigenous ecosystems and habitats are identified by June 2025. This policy appears to be pre-empting the forthcoming National Policy Statement for Indigenous Biodiversity (NPS-IB). CDC considers that any amendments giving effect to the NPS-IB should be addressed in a separate plan variation process.	Delete 'By 30 June 2025' from this policy.
S25.028	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>As per submission on Policy 23, CDC opposes the amendments to require that SNAs are identified by June 2025.</p> <p>CDC also considers that, due to the breadth of ecosystems and habitats included in Appendix 1A, the revised policy will effectively provide for no offsetting or compensation opportunities across many parts of the region.</p>	Revert to original text of Policy 24.
S25.032	Chapter 4.1:	Policy 30: Maintaining	Support	CDC supports this policy and recognition of Carterton as a locally significant centre.	Retain this policy.

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	Regulatory policies	and enhancing the viability and vibrancy of regionally and locally significant centres - district plans			
S25.033	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	CDC supports this policy. The approach outlined in (c) is appropriate in the Carterton context and will be reflected in the draft Wairarapa Combined District Plan.	Retain this policy
S25.034	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	CDC supports the approach in this policy, of ensuring that industrial land is protected for industrial use. The draft Wairarapa Combined District Plan is consistent with this policy.	Retain this policy.
S25.035	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Oppose	CDC seeks further guidance on how this should be implemented in an RMA framework.	Further guidance provided by GWRC on how this should be given effect to.
S25.036	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	The explanation notes that these matters can only be considered in a discharge permit or coastal permit. Therefore, the application of this policy is unclear. If the scope for considering these matters is limited, that should be made clear in the chapeau of the policy.	Amend the policy so that it is clear that these considerations can only apply to discharge permits and coastal permits.

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S25.037	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	CDC supports this policy but notes that (f) is better addressed via the Building Act framework, rather than through RMA processes. Request deletion of clause (f).	<p>Amend the policy as follows:</p> <p>Policy CC.14: Climate-resilient urban areas - consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, provide for actions and initiatives, particularly the use of nature-based solutions, that contribute to climate resilient urban areas, including:</p> <p>...</p> <p>(f) buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.</p>
S25.038	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>While CDC supports a more holistic consideration of the effects of earthworks and vegetation clearance, it is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m²).</p> <p>It is unclear how policies, rules and methods, and subsequent assessment of land use consent applications, should be applied in a district plan context. CDC does not have the capacity to undertake an assessment of the matters described in this policy, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks.</p> <p>Policies, rules and methods addressing these matters are more appropriate in a regional plan and therefore CDC requests that references to district plans are removed from this policy.</p>	Remove reference to district plans from this policy, so that the requirements only apply to regional plans.
S25.039	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Retain the policy.	Retain the policy.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S25.040	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	CDC supports the amendments to this policy, noting that the draft Wairarapa Combined District Plan has been developed in a way that will give effect to this policy.	Retain the policy.
S25.041	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support	CDC supports the amendments to this policy.	Retain the policy.
S25.042	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support	<p>CDC supports integrated development in the Eastern Growth corridor - Hutt to Masterton. However, CDC does not consider that this policy in its proposed form is appropriate in Carterton. The public transport network in the Wairarapa is limited, and as a predominantly rural area, there are practical limits to the way in which public transport can be utilised. While active modes can be encouraged, and the rail network provides a linkage to other towns on the Wairarapa line, the heavy emphasis on public transport networks is not appropriate in the Wairarapa context.</p> <p>CDC is concerned that the policy requires that land use and transport planning is integrated for new development and would instead support the policy seeking 'particular regard' be given to these matters in Carterton.</p> <p>Requiring this for consent applications for land use and development is also onerous and has the potential to create a significant burden in preparation and processing of consents for relatively small developments. Softening the wording will allow some discretion in when this policy should be considered.</p>	<p>Amend the policy as follows:</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, require land use and transport planning within the Wellington Region is integrated in a way which have particular regard to the way in which land use and transport planning is integrated within the Wellington Region, so that it:</p> <p>(a) supports a safe, reliable, inclusive and efficient transport network;</p> <p>(b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity;</p> <p>(c) minimises private vehicle travel and trip length, where practical, while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes;</p> <p>(d) encourages an increase in the amount of travel made by public transport and active modes;</p> <p>(e) provides for well-connected, safe and accessible multi modal transport networks, where practical, while recognising that the timing and sequencing of land use and public transport may result in a period where the</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>provision of public transport may not be efficient or practical;</p> <p>(f) supports and enables the growth corridors in the Wellington Region, including:</p> <p>(i) Western Growth Corridor - Tawa to Levin;</p> <p>(ii) Eastern Growth Corridor - Hutt to Masterton;</p> <p>(iii) (iii) Let's Get Wellington Moving Growth Corridor.</p>
S25.043	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	<p>CDC supports the requirement to ensure that new development can be supported by appropriate infrastructure.</p> <p>However, the application of this policy is potentially very broad, in that it applies to all new urban development (presumably of any scale and including infill development). Clause (b) is structured in a way that implies that new development must provide low or zero carbon, multi-modal and public transport infrastructure. CDC requests amendments to clause (b) to delete these references, as they obfuscate this policy, and other policies already encourage a range of transport infrastructure.</p>	<p><i>[Note: No changes are shown in 'amendment as follows' section. Changes requested are described in 'reasons' section. Somewhat unclear how amendments would be reflected as it would change structure of provision (b)]</i></p> <p>Amend as follows:</p> <p>Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, require all new urban development including form, layout, location, and timing is sequenced in a way that:</p> <p>(a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and</p> <p>(b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S25.044	Chapter 4.4: Non-regulatory policies	General comments - non-regulatory policies	Support	CDC is generally supportive of the non-regulatory methods proposed but notes that there will be financial implications in giving effect to these. CDC would seek practical and financial support from GWRC in implementing these methods.	Retain the policies. GWRC to provide practical and financial support to implement these methods.
S25.045	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	CDC supports this policy, and in particular the recognition of the effects that afforestation has on the social and economic wellbeing on communities. GWRC should work with local communities to manage the location and impacts of new forest, and any afforestation should be spread equitably across the region. CDC requests that this policy is more explicit in its preference for permanent, rather than plantation, forestry.	Amend the policy so that it applies to permanent forest.
S25.046	Chapter 4.5: Methods to implement policies (regulatory methods)	General comments - regulatory methods	Oppose	Submission point relates to Method 21. As stated in the submission on Policy 23, the timeframe proposed to identify and include SNAs in the Wairarapa Combined District Plan is very short given the lack of available resource, long term planning cycle and any consequential amendments required to the Wairarapa Combined District Plan as a result of the identification process. CDC opposes the inclusion of these dates, for the same reasons outlined in its submission on Policy 23. CDC supports the inclusion of alternative options where the timeframe is not able to be met.	Remove this method.
S25.047	Chapter 4.5: Methods to implement policies (regulatory methods)	General comments - regulatory methods	Support	Submission point relates to Method CC.4. CDC supports joint preparation and implementation of a regional forest spatial plan, and requests involvement at an early stage of development.	Retain this method.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S83 CentrePort Limited					
S83.001	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	Renewable energy generation should be enabled beyond 100kw to facilitate transition to low carbon economy	Enable renewable energy generation beyond 100kw (policy is limited to small scale generation and electricity only)
S83.002	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Recognising the benefits of RSI	Retain as notified
S83.003	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	The submitter supports the protection of strategic freight network locations to enable carbon efficiency	Retain as notified. However, potential further emphasis on identifying and protecting strategic locations for freight movement facilities
S83.004	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment	Support	There is a need for clear provision and protection of industrial employment locations such as port areas and freight distribution hubs.	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		locations - district plans			

S17 Chelsea Kershaw

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S17 Chelsea Kershaw					
S17.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support RPS that helps to deliver more homes without higher transport-related greenhouse gas emissions.	Retain as notified.
S17.002	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.
S17.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Creating climate-resilient urban areas is supported.	Retain, refine and enhance provisions.
S17.004	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	The biodiversity provisions throughout the RPS are supported.	Retain, refine and enhance provisions.
S17.005	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Do not support greenfield subdivisions that externalise environmental and infrastructure costs, As such, support requirement for new greenfield developments to show a Travel Demand Management (TDM) plan. There may be other options besides TDM plans to ensure the development of an urban form that is not private car-dependent.	Consider other policy tools than TDM plans - provisions should be strengthened rather than diluted.
S17.006	Chapter 3.9: Regional form,	General comments - urban development	Support in part	Important for all councils to do everything they can to incentivise good intensification for growth, rather than greenfield sprawl.	Retain and strengthen provisions to incentivise good intensification for growth, rather than greenfield sprawl.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	design and function				
S17.007	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Councils' planning, regulatory and consenting teams to be upskilled in climate change policy and density-done-well by intensification.

S49 Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand Trading Limited

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S49 Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand Trading Limited					
S49.001	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	The existing infrastructure examples provided is too limited, and should align with the RPS definition of Regionally Significant Infrastructure as proposed in RPS PC1.	Amend the introduction to Chapter 3.9 as follows: 2. Sporadic, uncontrolled and/or uncoordinated development Sporadic, uncontrolled and/or uncoordinated, development (including of infrastructure) can adversely affect the region's compact form. This can, among other things, result in: (a) new development that is poorly located in relation to existing infrastructure (such as telecommunications networks , roads, public transport, water supply, sewage and stormwater systems) and is costly or otherwise difficult to service
S49.002	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	The amendments proposed to Policy 7 create a weighting which requires particular recognition of low and zero carbon regionally significant infrastructure above regionally significant infrastructure. The policy needs to explain what low and zero carbon regionally significant infrastructure is, and also needs to ensure that the importance of regionally significant infrastructure is not minimised if it does not meet the definition of low and zero carbon regionally significant infrastructure.	Retain Policy 7, with an amendment to explain what <i>low and zero carbon regionally significant infrastructure</i> is and how this is different to defined regionally significant infrastructure in the RPS.
S49.003	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development	Support in part	Policy 29 is supported in that it is entirely appropriate for regional and district plans to identify and map areas susceptible to natural hazards. Telecommunication companies rely on this identification to help understand the risk profile of their infrastructure, and influence decisions as to where new	Remove the ability for regional and district plans to regulate the resilience of infrastructure to identified natural hazards.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		in areas at risk from natural hazards - district and regional plans		<p>infrastructure should go, and how it should be designed to be resilient. However, there is no need for regional or district plans to regulate the resilience of telecommunications infrastructure where it is located in natural hazard areas. In some instances, avoiding a natural hazard area is not possible for technical and operational reasons.</p> <p>The telecommunication companies have obligations under the Civil Defence Emergency Management Act 2002 (CDEMA) to provide resilient infrastructure. This is regulated under the CDEMA, and adding another layer of regulation of resilience through regional and district plans is not necessary.</p> <p>This is also recognised in Regulation 57 of the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF). Regulation 57 of the NESTF is as follows, and clearly exempts regulated activities under the NESTF from having to comply with District Plan rules about natural hazards:</p> <p>57 District rules about natural hazard areas disapplied</p> <p>(1) A territorial authority cannot make a natural hazard rule that applies to a regulated activity .</p> <p>(2) A natural hazard rule that was made before these regulations came into force, does not apply in relation to a regulated activity.</p> <p>(3) In this regulation, natural hazard rule means a district rule that prescribes measures to mitigate the effect of natural hazards in an area identified in the district plan as being subject to 1 or more natural hazards.</p> <p>Section 6.11 of the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 Users' Guide, published by the Ministry for the Environment (August 2018) confirms the exemption of regulated telecommunications activities from having to comply with District Plan natural hazard rules, via the following statement:</p> <p>Regulation 57 makes it clear that natural hazard rules in district plans do not apply to a regulated activity under the NESTF. It also makes clear</p> <p>that territorial authorities cannot make natural hazard rules that apply to regulated activities under the NESTF. This is because resilience is already factored into industry practice, and they will either avoid hazard areas or engineer structures to be resilient to the hazard risk. Natural hazards encompass the full breath of hazards including flooding, instability, earthquake</p>	

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				and climate change. Given this direction is provided at a national level, it would be appropriate for regional and district statutory planning documents to be consistent. It is entirely appropriate for district and regional plans to regulate infrastructure in natural hazards whereby that regulation is to ensure that the development on infrastructure does not exacerbate the effect of the natural hazard on any other party.	
S49.004	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	The amendments proposed to Policy 39, similar to the amendments proposed to Policy 7, create a weighting which requires particular recognition of regionally significant infrastructure which contributes to reducing greenhouse gas emissions above regionally significant infrastructure as defined in the RPS. The policy needs to ensure that the importance of regionally significant infrastructure is not minimised if it does not make a quantifiable contribution to the reduction of greenhouse gas emissions.	Retain Policy 39, with an amendment to explain what is meant by the statement <i>in particular where it contributes to reducing greenhouse gas emissions</i> .
S49.005	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	There is no need for regional or district plans to regulate the resilience of telecommunications infrastructure where it is located in natural hazard areas. In some instances, avoiding a natural hazard area is not possible for technical and operational reasons.	Remove the ability for regional and district plans to regulate the resilience of infrastructure to identified natural hazards.
S49.006	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Clause(c) specifically allows structural protection or hard engineering methods to protect regionally significant infrastructure from hazards. Whilst this is not necessarily a preferred method of the telecommunications companies, provision to allow such methods to be employed if necessary is supported.	Retain as notified
S49.007	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with	Support in part	Infrastructure is critical to a successful urban development, and this is recognised in the policy. In particular, the requirement in the policy to be sequenced so that infrastructure is provided before development, is supported. The explanation that this includes three waters infrastructure and transport infrastructure	Amend as follows: <i>Policy 58 requires development to be sequenced such that infrastructure that is necessary to service the development will be provided before the development occurs. This includes both all regionally</i>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		development and operation of infrastructure - consideration		that would be necessary to support the development should be widened to include all aspects of regionally significant infrastructure needed to support the development, rather than solely highlighting only two of a myriad of necessary infrastructure matters.	significant three waters infrastructure and transport infrastructure that would be necessary to <i>support the development</i> .
S49.008	Appendix 3: Definitions	Regionally significant infrastructure	Support	The definition of regionally significant infrastructure as amended in Proposed Change 1 appropriately recognises statutory definitions of both telecommunications and radiocommunications.	Retain as notified

S57 Colleen Munro_Mangaroa Peatland Focus Group

S142 Combined Cycle Submitters (CCS)

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S142 Combined Cycle Submitters (CCS)					
S142.001	Chapter 3.1A: Climate change	Objective CC.3	Support	Supports inclusion of external climate and mode shift targets within the RPS, such as Wellington RLTP 2021 targets at Objective CC.3, in order to give them statutory weight. We request that these are retained within Change 1.	Retain as notified.
S142.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support	Supports the integrated management approach of Change 1 generally and request that care is taken to maintain the integrity of this approach.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S142.003	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support	Supports these two policies. Consider that they provide appropriately clear direction which aligns the RPS with the approach to mode shift and climate mitigation in relevant non-statutory documents and regional commitments.	Retain as notified.
S142.004	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Supports these two policies. We consider that they provide appropriately clear direction which aligns the RPS with the approach to mode shift and climate mitigation in relevant non-statutory documents and regional commitments.	Retain as notified.
S142.005	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	Supports amendments in Policy 57 which further and more explicitly embed decarbonisation and mode shift considerations; however request retention of the term 'attractive' given further definition provided by the Environment Court.	Amend clause (e) as follows: (e) provides for well-connected, safe, attractive and accessible multi modal transport networks....
S142.006	General comments	General comments - overall	Support	Highly supportive of efforts to align provisions in the Regional Policy Statement with climate and mode shift commitments made by national, regional and local authorities, often in non-statutory documents.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S136 DairyNZ					
S136.001	General comments	General comments - overall	Oppose	<p>Recent direction from the High Court to Otago Regional Council, on the Proposed Otago Regional Policy Statement indicates the scope for use of the streamlined freshwater planning process is narrower than GWRC appears to consider.</p> <p>Further, concerned at the significant lack of robust analysis in the s32 analysis of PC1 to the RPS, particularly in relation to climate change, freshwater and biodiversity under PC1, including a lack of assessment of the economic and social costs to primary production, rural communities and the regional economy, and a lack of assessment given to the costs and benefits of waiting for further national direction in these areas.</p> <p>Considers a more efficient and effective process would be to postpone these changes to the RPS with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3), to allow for a more robust assessment of the proposed provisions and to provide for further national direction in these areas, to enable a better-informed assessment of GWRC's role in addressing these issues.</p>	Reduce scope to changes needed to address the NPS-UD and urban climate change related issues only. Postpone all other changes (freshwater, biodiversity, climate change) until at least the scheduled full review of the RPS and Regional Plan in 2024.
S136.002	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose	<p>Considers any plan change that is intended for the RPS to 'give effect to' the NPS-FM should include the other components the NPS-FM also requires of the RPS; including freshwater visions and supporting values, and related objectives and policies. An integrated process of this nature is vital for providing an informed discussion to allow the setting of clear direction for freshwater management in the region.</p> <p>A more effective and efficient process would be to delay the changes to the RPS, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1,2 and 3). Resulting in one Freshwater Planning process once when making all the required changes to give effect to the NPS-FM 2020, and would more appropriately give effect to the NPS-FM requirements outlined at 3.2.</p>	Delete changes and address issues through a full review of the RPS.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S136.003	Chapter 3.4: Fresh water (including public access)	Table 4	Oppose	Believe a more effective and efficient process would be to delay changes to the RPS, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3).	Delete changes and address issues through a full review of the RPS.
S136.004	Chapter 3.4: Fresh water (including public access)	Objective 12	Oppose	A more effective and efficient process would be to delay changes, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3).	Delete changes and address issues through a full review of the RPS
S136.005	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Oppose	<p>The Indigenous Ecosystems chapter should be paused to be considered in the full review of the RPS, following meaningful engagement and further understanding of the national direction from the NPS-IB which will play a crucial role in setting the direction for the Region.</p> <p>By delaying the introduction of the Indigenous Ecosystems chapter will remove any pre-emptive guessing as to what the finalised NPS-IB will include as well as the other national tools being introduced impacting the RPS.</p> <p>Believe that the Indigenous Ecosystems should be separated out to focus on Freshwater and chapter Indigenous Biodiversity separately to allow for the implementation of the NPS-IB and the NPS-FM respectively.</p>	<p>Delete changes and address issues through a full review of the RPS.</p> <p>Separate out indigenous ecosystems into separate provisions to focus on freshwater and indigenous biodiversity to align with the implementation of the NPS-IB and NPS-FM.</p>
S136.006	Chapter 3.6: Indigenous ecosystems	Objective 16	Oppose in part	<p>In relation to indigenous vegetation and indigenous habitats, the wording as proposed goes beyond that required under S6 of the RMA which requires (emphasis ours) "The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna are of national importance".</p> <p>Regional Plans, District Plans and other lower level planning documents that are required to 'give effect to' the RPS are more appropriate avenues for considering where and whether to extend these protections beyond areas of significance.</p> <p>The NPS-FM does provide direction in relation to indigenous ecosystems than directed in the RMA. However, as with the majority of freshwater related provisions in PC1 any amendments aimed at giving effect to the NPS-FM should be considered together.</p>	<p>Delete Objective 16 and address the issue through a full review of the RPS</p> <p>OR</p> <p>Amend Objective 16 as follows (or words to similar effect):</p> <p>Significant indigenous Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are maintained protected, enhanced, and restored to a healthy functioning state.</p>

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S136.007	Chapter 3.6: Indigenous ecosystems	Objective 16A	Oppose in part	<p>Supports an objective to improve the current state of the regions ecosystem however concerned with the objective's wording and the use of "restoring to a healthy functioning state" which has not been defined and will depend on the outcome of the freshwater plan change process.</p> <p>Support consideration of a focus on significant indigenous biodiversity and habitats as required at s6 of the RMA through amendments to Objective 16 (as above) with a broader focus on s7 matters through an appropriate rewording of this Objective.</p>	<p>Delete Objective 16A and address the issue through a full review of the RPS OR Amend Objective 16A (or words to similar effect):</p> <p>The region's indigenous ecosystems are maintained, enhanced, and restored to a healthy functioning state, increasing their improving resilience to increasing environmental pressures, and giving effect to Te Rito o te Harakeke.</p>
S136.008	Chapter 3.6: Indigenous ecosystems	Objective 16C	Oppose in part	<p>Support the intention to recognise and support landowners, as with the other objectives relating to biodiversity we believe an objective of this nature should be considered through a full review of the RPS.</p> <p>Also concerned at the use of the word 'steward'. This infers a responsibility of landowners to deliver 'community values' with no clarity around what this may mean in a practical sense.</p> <p>Dairy farmers hold a significant amount of land and therefore indigenous ecosystems. Needs to ensure that the RPS provides opportunity for farming to continue as a viable operation while working with farmers. The wording of this objective should reflect this intent, without unduly inferring a responsibility on farmers as solely responsible for delivering on community values.</p>	<p>Delete Objective and address the issue through a full review of the RPS OR Amended objective 16C as follows (or words to similar effect):</p> <p>Landowner and community values in relation to indigenous biodiversity are recognised and provided for. Landowners are engaged with, recognised and their roles as stewards are supported.</p>
S136.009	Chapter 3.1A: Climate change	Objective CC.1	Oppose	<p>Believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach.</p> <p>Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.</p>	Delete Objective CC.1 and any related provisions or methods and address the issue through a full review of the RPS.
S136.010	Chapter 3.1A: Climate change	Objective CC.2	Oppose	<p>Believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach. Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.</p>	Delete Objective CC.2 and any related provisions or methods and address the issue through a full review of the RPS.
S136.011	Chapter 3.1A:	Objective CC.3	Oppose	<p>Believe the analysis included in the section 32 report to support this policy position is inadequate to determine the costs or benefits of this approach. The analysis contradicts the</p>	Delete Objective CC.3 and any related provisions or methods and address the issue through a full review of the RPS. Undertake adequate analysis (within the Section 32 report) to

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Climate change			<p>most recent science on split-gas targets from IPCC AR6 report.</p> <p>The analysis uses IPCC global shared socioeconomic pathways to set regional emission reduction targets. IPCC has advised that these pathways are not appropriate for setting domestic policy.</p> <p>The analysis does not adequately outline the costs of implementation on affected parties. The economic analysis of implementation is based on avoided cost of emissions and does not consider cost of abatement. The underlying assumptions of the analysis are inconsistent with the realities the region are facing.</p>	determine an appropriate target with consideration of the implementation, costs and impact.
S136.012	Chapter 3.1A: Climate change	Objective CC.4	Oppose	Believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach. Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.	Delete Objective CC.4 and any related provisions or methods and address the issue through a full review of the RPS.
S136.013	Chapter 3.1A: Climate change	Objective CC.6	Oppose	Believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach. Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.	Delete Objective CC.6 and any related provisions or methods and address the issue through a full review of the RPS.
S136.014	Chapter 3.1A: Climate change	Objective CC.7	Oppose	Believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach. Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.	Delete Objective CC.7 and any related provisions or methods and address the issue through a full review of the RPS.
S136.015	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>Whilst support the intent to reduce agricultural emissions, concerned about the inconsistencies and duplication of the work underway through the He Waka Eke Noa partnership and the Governments pricing proposal for agricultural greenhouse gas emissions. Developing a regionalised approach to a national issue will lead to misalignment with national policies and instruments, confusion at local level, misallocation of resources and unintended consequences.</p> <p>Another concern is around the issue of emissions leakage. Any shift in production offshore due to domestic and regional policy setting would lead to an increase in global greenhouse gas emissions due to other producers being less efficient.</p>	Delete Objective CC.5 and any related provisions or methods and address the issue through a full review of the RPS.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S136.016	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	<p>Acknowledges the changes to the RMA that come into effect in November 2022 which give councils the ability to consider greenhouse gas emissions within the consenting process. The s32 report fails to appropriately justify why regulatory intervention in the form proposed is justified, the economic and social impacts of that intervention, or whether the costs associated with the policy will outweigh the benefits from the regulation.</p> <p>The National Environment Standards for Freshwater require any intensification of land use over 10ha to gain a resource consent. Greenhouse gases could form a part of the considerations for consents triggered by this rule. However due to the lack of detail on how the assessment in a consenting process will be undertaken, concerned Policy CC.13 will result in unattended consequences and inconsistency with the national approach to reduce agricultural greenhouse gases. It is unclear what information will be accepted by council for consents and what granularity of greenhouse gases emissions changes will be impacted.</p> <p>Further work needs to be done to outline the details of how this policy will be implemented including the impact on farmers and what information will be accepted by councils in the consenting process.</p> <p>Concerned that Policy CC.13 only focuses on penalising increases and not rewarding reductions which farmers may implement for their own motivations. Support this policy being used as a carrot not just a stick.</p>	Delete Policy CC.13 and address the issue through a full review of the RPS.
S136.017	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	Delay inclusion of the changes of this until all of the NPS-FM can be implemented into the full RPS review. This will allow for further clarity about what Te Mana o te Wai will mean at a regional level as well as the outcomes of the Water Allocation Review in Method 48 to be considered.	Delete policy and address the issue through a full review of the RPS.
S136.018	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Update Policy to be in line with National Policy Statement on Highly Productive Land.	Amend Policy 56 to be consistent with National Direction.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S136.019	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Water availability will continue to be a pressing issue for the Greater Wellington region due to both the regulatory implications of implementing Te Mana o te Wai and the increasing pressures of Climate Change. Support Policy FW.7 and would like to see an ambitious and collaborative approach to investing and developing a diverse portfolio of nature based and constructed solutions to water storage in the region. This works could begin prior to any further regulatory changes. Water availability is crucial to most land uses and reliable access to water will create flexible for farmers and the wider community to adapt to climate change.	Delete Policy FW.7 and address the issue through a full review of the RPS.
S136.020	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Oppose	Opposes Method CC.5 outright for inclusion through PC1. There are already existing efforts underway to reduce agricultural greenhouse gas emissions. Deferral of this consideration until the full RPS review will enable alignment with the Primary Sector Climate Action Partnership between Government, the Primary Sector, and iwi/Māori - He Waka Eke Noa (HWEN). Through the full RPS review process will be able to leverage its existing rural networks, databases and environmental expertise that support change and improved management practices at a farm level to achieve the ambitious approach to climate change mitigation.	Delete Method CC.5 and address the issue through a full review of the RPS.
S136.021	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 48: Water allocation policy review	Oppose in part	Water availability will continue to be a pressing issue for the Greater Wellington region due to both the regulatory implications of implementing Te Mana o te Wai and the increasing pressures of Climate Change. Support an ambitious and collaborative approach to investing and developing a diverse portfolio of nature based and constructed solutions to water storage in the region. This works could begin prior to any further regulatory changes. Water availability is crucial to most land uses and reliable access to water will create flexible for farmers and the wider community to adapt to climate change. These issues should be a key priority to be addressed in the review and this work should align with the review of the NRP in 2023/2024.	Delete Method 48 and address the issue through a full review of the RPS.
S136.022	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose	The NPS-FM directs (at 3.2(1)) that every regional council must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region. The changes in PC1 to the RPS do not provide any greater clarity or direction on how Te Mana o te Wai applies to freshwater in the region.	Undertake further consultation to determine how Te Mana o te Wai applies to freshwater in the region.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S32 Director-General of Conservation					
S32.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	General comments - Chapter 3	Support	The proposed additions usefully outline the issues to be addressed.	Retain introduction section as notified, except where specific changes are requested below.
S32.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	It is unclear in clause (c) whether the life-supporting capacity of ecosystems is to be protected and enhanced in its own right, or only as part of mana whenua / tangata whenua values. S5(b) of the Act requires that it be safeguarded in its own right, so this should be made clear.	Amendas follows, or words to like effect: "(c)protects and enhances mana whenua / tangata whenua values, in particularmahinga kai; and(d) protects and enhances the life-supporting capacity of the environment; and... "
S32.003	Chapter 3.1A: Climate change	General comments - climate change	Support	It is appropriate to recognise and address climate change in the RPS, and as part of this to specifically recognise the impacts of climate change on ecosystem health and biodiversity, and the role of nature-based solutions.	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S32.004	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support in part	The proposed changes recognise Te Mana o te Wai, which is appropriate under the NPSFM, as is the inclusion of iwi statements. However, the structure of the proposed Objective 12 includes the iwi statements under the six principles which Te Mana o te Wai encompasses, which is not an accurate reflection of the NPSFM. This means it is unclear to plan users how those iwi statements are to be applied when implementing the RPS.	Retain as notified, except to amend Policy 12 to clarify how iwi statements are to be applied.
S32.005	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	The proposed changes give effect to s30 and 31 of the Act, and are consistent with Te Mana o te Taiao Aotearoa New Zealand Biodiversity Strategy 2020 and the associated Implementation Plan 2022. They are also consistent with the exposure draft NPS for Indigenous Biodiversity. The references to Public Conservation Land not adequately representing all types of indigenous ecosystem, and having few options for expansion, are an accurate reflection of the situation, and provide support for the approach taken to other changes in this chapter.	Retain as notified, except where specific changes are requested below.
S32.006	Chapter 3.8: Natural hazards	General comments - natural hazards	Support	The proposed changes are an appropriate response to current information on climate change, and recognise that natural hazards and mitigation measures can impact on natural values.	Retain as notified.
S32.007	Chapter 3.9: Regional form, design and function	Objective 22	Support	This objective provides useful regional context for what constitutes well-functioning urban environments. In particular, recognition of the need to protect freshwater and meet other objectives relating to land, freshwater, coast and indigenous biodiversity is appropriate in terms of higher order documents and integrated management.	Retain as notified.
S32.008	Chapter 3.9: Regional form, design and function	Objective 22B	Support	This objective supports a strategic approach to development. In particular, recognition of the need to manage impacts on significant values and features is appropriate in terms of higher order documents and integrated management.	Retain as notified.
S32.009	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Support in part	The proposed changes appropriately respond to climate change and national direction. In particular, the promotion of indigenous over exotic species for permanent forests (Policy CC.6), and support for nature-based solutions (Policy CC.7), provide additional biodiversity benefits.	Retain as notified, except where specific changes are requested below.
S32.010	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in	Support	The proposed changes give better effect to Policy 13 of the NZCPS. Some elements proposed to be removed from the explanation could potentially be retained or reworded, but doing so would not alter the effect of the Policy.	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		the coastal environment - district and regional plans			
S32.011	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	The proposed changes to this policy are appropriate as part of giving effect to the NPSFM 2020. However, they do not in themselves give complete effect, and the section references in the explanation are incomplete.	Retain the Policy as notified and make the following changes to the associated new explanation, or words to like effect: "Policy 12 gives sets out key elements of giving effect to the national direction set by the National Policy Statement for Freshwater Management 2020, including sections 2.2, 3.2 and 3.8-3.17. "
S32.012	Chapter 4.1: Regulatory policies	Policy 13: Allocating water - regional plans	Oppose	The reason given for proposing deletion of this Policy is that it is covered by the proposed Policy 12. However, Policy 12 focusses on process rather than outcomes, whereas the existing Policy 13 provides specific guidance to take account of aquatic ecosystem health and saltwater intrusion.	Decline the proposed change and retain the operative version of Policy 13.
S32.013	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area. They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.	Retain as notified, except for the following changes or words to like effect: (h) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries and the coastal marine area;
S32.014	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	The proposed changes to this policy would leave a timing gap in its effect until target attribute states have been set. They would also mean that as long as the target attribute state is met there would be no requirement to minimise erosion and siltation (ie it would allow deterioration of water quality down to the target attribute state).	Decline the proposed change and retain the operative version of Policy 15, or, Retain the proposed plan change and existing the requirements of the operative version of Policy 15.
S32.015	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people -	Support in part	The proposed change would have the effect of treating any and all community or public water supply, including for industrial and farming use, as being for health needs of people. This is inconsistent with Te Mana o te Wai, which provides for industrial and farming use of water in the third priority.	Amend the proposed Policy as follows or words to like effect: "...The health needs of people include the drinking water component of: The taking of water by any..."

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		regional plans			
S32.016	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended.</p> <p>Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.</p> <p>Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.</p>	Retain as notified except for the following changes: "(b)actively involve mana whenua / tangata whenua in freshwater management(including decision-making processes), and identify and provide for Māori freshwater values are identified and provided for; ..."
S32.017	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.</p> <p>The requirement for "considering" daylighting of streams where practicable provides no clarity of the intended outcome and should be strengthened.</p>	Retain as notified, except for the following change: " (p)Consider Encourage and support daylighting of streams, where practicable;
S32.018	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	The inclusion of a deadline to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values is an appropriate measure to ensure that S6(c) of the RMA is given effect to. Although this is a shorter timeframe than is currently indicated in the exposure draft of the NPS for Indigenous Biodiversity, it is not unreasonable given that the RPS has required this work to be undertaken since 2013.	Retain as notified
S32.019	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with	Support	These proposed provisions are generally appropriate. However, if an NPS for Indigenous Biodiversity is gazetted prior to decisions being made on the provisions, then they should be reviewed for compliance with that document.	Retain as notified, subject to any changes which may be required to give effect to an NPS for Indigenous Biodiversity.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		significant indigenous biodiversity values - district and regional plans			
S32.020	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	While the proposed changes are generally appropriate in most locations, they fail to give effect to NZCPS 2010 Policy 25, especially clauses a and b of that Policy which require avoiding increasing risk.	Amend the policy to give effect to the NZCPS, including by adding a new subclause as follows or words to like effect: "include objectives, polices and rules to avoid subdivision, use or development within the coastal environment that would increase the risk of adverse effects from coastal hazards"
S32.021	Chapter 4.2: Matters to be considered	General comments - consideration policies	Support in part	The proposed changes appropriately respond to climate change and national direction.	Retain as notified, except where specific changes are requested below.
S32.022	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	The proposed changes are appropriate in giving effect to the NPSFM 2020 and the NZCPS 2010. However, the first two subclauses require amendment so that they provide direction and not just a statement.	Retain as notified, except for the following changes: "(a) ensuring that..." "(b) ensuring that..."
S32.023	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance	Support in part	The proposed changes to this policy would leave a timing gap in its effect until environmental outcomes, target attribute states, and limits have been set. They would also mean that as long as those requirements were met there would be no requirement to minimise erosion and siltation. It is unclear why Notices of Requirement have been deleted	Amend the proposed policy to ensure that: <ul style="list-style-type: none"> The operative version of Policy 41 applies until such time as environmental outcomes and target attribute states are identified;

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		- consideration			<ul style="list-style-type: none"> All matters in the operative version of Policy 41 remain covered (including considerations for designations, planning processes and minimising erosion)
S32.024	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	<p>The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area.</p> <p>They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.</p>	<p>Retain as notified, except for the following changes or words to like effect:</p> <p>(j) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries and the coastal marine area;</p>
S32.025	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	<p>The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area.</p> <p>They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.</p>	<p>add a new clause:</p> <p>"Require that urban development is located and designed to allow water bodies to meander and move naturally".</p>
S32.026	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area.</p> <p>They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.</p>	<p>Add a new subclause:</p> <p>"Require that urban development is located and designed to allow water bodies to meander and move naturally".</p>
S32.027	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended.</p> <p>Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just</p>	<p>"(g) protecting the habitats of indigenous freshwater species are protected;" ...</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				restricted. Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.	
S32.028	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Climate change and sea level rise can increase the frequency or magnitude of a hazard event, so this is a relevant matter to consider.	Retain as notified, except to retain the operative version of subclause (b): " the potential for climate change and sea level rise to increase in the frequency or magnitude of a hazard event "
S32.029	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	While the proposed changes are generally appropriate for most locations, they fail to give effect to NZCPS Policy 25, especially clauses a and b of that Policy which require avoiding increasing risk.	Add a new subclause as follows or words to like effect: " avoiding hazard mitigation measures within the coastal environment that would increase the risk of social, environmental and economic harm or other adverse effects from coastal hazards "
S32.030	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended. Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted. Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.	"(h) ensuring that freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;...
S32.031	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended. Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just	"(r)restoring and maintaining fish passage where appropriate "

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				restricted. Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.	
S32.032	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended. Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted. Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.	Replacing the word "restricting" in subclauses (n) - (q) with the word "minimising".
S32.033	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values. The requirement for "considering" daylighting of streams where practicable provides no clarity of the intended outcome and should be strengthened.	add a new subclause as follow or words to like effect: "Require that urban development is located and designed to allow water bodies to meander and move naturally".
S32.034	Chapter 4.3: Allocation of responsibilities	General comments - allocation of responsibilities	Support	The proposed changes appropriately and usefully allocate responsibilities for biodiversity and freshwater.	Retain as notified.
S32.035	Chapter 4.4: Non-regulatory policies	General comments - non-regulatory policies	Support	The proposed changes appropriately respond to climate change and national direction.	Retain as notified.
S32.036	Chapter 4.5: Methods to implement	General comments - regulatory methods	Support	The proposed changes appropriately revise the methods to support proposed changes to objectives and policies, including changes supported in this submission.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	policies (regulatory methods)				
S32.037	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support in part	The inclusion of this table is an appropriate reflection of the status of the listed ecosystems and species, and is useful for implementation of the relevant policies. However, there are ongoing changes to our knowledge of the status of ecosystems and species (eg threat classifications for plants are currently under review), so the RPS will need to be able to reflect the most up-to-date information.	Retain Table 17, but prior to finalising decisions on the RPS change either update the table to ensure it is as up-to-date as possible, or add generic reference to threat classifications.
S32.038	Appendix 3: Definitions	General comments - definitions	Support in part	The proposed definitions generally appropriately reflect national direction and/or support changes to objectives, policies and methods.	Retain as notified, except where specific changes are requested below.
S32.039	Appendix 3: Definitions	Threatened ecosystems or species	Support in part	The definition applies to ecosystems and species, but the content only addresses ecosystems. In order to be effective the definition needs to include species as well, and the New Zealand Threat Classification System is the appropriate standard for this.	Amend the definition as follows, or words to like effect (or provide separate definitions for threatened ecosystems and threatened species): " These ecosystems which are described by the IUCN Red List categories as Critically Endangered, Endangered and or Vulnerable; or species which are classified by the New Zealand Threat Classification System as Nationally Critical, Nationally Endangered, Nationally Vulnerable or Nationally Increasing.
S32.040	Appendix 3: Definitions	Enhancement (in relation to indigenous biodiversity)	Support in part	Proposed definitions relating to indigenous biodiversity are generally appropriate. However, if an NPS for Indigenous Biodiversity is gazetted prior to decisions being made on the definitions, then they should be reviewed for compliance with that document.	Retain as notified, subject to any changes which may be required to give effect to an NPS for Indigenous Biodiversity.

S116 Doctors for Active, Safe Transport (DAST)

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S116 Doctors for Active, Safe Transport (DAST)					
S116.001	Chapter 4.1:	Policy CC.1: Reducing greenhouse	Support in part	The health of people should be explicitly stated as a rational for mode shift (in addition to climate change). This is "tucked into" provisions very explicitly about climate change.	Amend Policy CC.1 by addition as follows: "District and regional plans shall include objectives, policies, rules and/or methods to require that all new and altered transport

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regulatory policies	gas emissions associated with transport infrastructure - district and regional plans		<p>We are a network of over 130 Wellington and Lower Hutt Hospital doctors advocating for the benefits of active transport. This submission is informed by our experience of Riverlink, where GWRC (as one of three applicants) approved of the worsening health outcomes that health experts said would result from further increases in motorised traffic because they were "not worse the currently expected". This is appalling.</p> <p>Protecting and improving the health of your people is central to your mandate. The link between transport and health should be explicit.</p>	infrastructure is designed, constructed, and operated in a way that contribute to reducing greenhouse gas emissions and improved health outcomes by:..."
S116.002	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>Proposals for "maximising mode shift" should be required to robustly assess options. Our experience from Riverlink was that motorised transport was subject to detailed evaluation or impacts on flow and safety. Assessment of active modes was cursory and qualitative only.</p> <p>Proposals for "maximising mode shift" should also consider the impact on the wider network. In Riverlink, improvements for motorised transport claimed benefits from decreased congestion, but did not assess worsening congestion elsewhere on the road network. Likewise, active transport improvements were proposed independently of, and disconnected from, the cycle network outside of the project designation.</p>	Amend Policies CC.9, policy EIW.1 and Policy 57 to require a robust quantitative assessment of mode shift options and consideration of impacts on the wider network.
S116.003	Chapter 3.1A: Climate change	Objective CC.1	Support in part	<p>There are substantial health benefits from active transport - in particular cycling. These include substantial reductions in heart disease, cancer, diabetes and death - illnesses currently pushing our health system beyond capacity.</p> <p>The benefits are in addition to the substantial benefits to minimising climate change from transport.</p> <p>We submitted and were involved in the Environment Court Hearing on Riverlink. We were saddened and angered that mode shift was given lip service, while relentless growth in motor vehicle transport remains at the heart of the transport components of Riverlink - a project strongly endorsed by GWRC.</p>	Include a requirement for mode shift in CC.1.
S116.004	Chapter 3.1A: Climate change	General comments - climate change	Support in part	In high- and middle-income countries physical inactivity has become the fourth leading risk factor for premature mortality. Policies designed to effect a population-level modal shift to more active modes of work commuting present major opportunities for public health improvement.	Require health assessments of transport under policy CC.9, policy EIW.1 and policy 57. The heart of transport planning must be to facilitate and promote rapid modal shift.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>Mode shift has all been agreed in policy statements by councils for some years. It is a clear requirement of the Government Policy Statement. However, it's still not happening.</p> <p>We are saddened - and your people's health has suffered as a result - that the development of cycling infrastructure remains subject to piecemeal planning and disconnected networks with variable levels of service.</p> <p>This is also about much more than capital works projects.</p> <p>This requires leadership - looking at this evidence and making our cities and roads the best they can be for everyone - not just motorists.</p> <p>We need to - urgently - reduce our dependence on private motor vehicles - they are the key driver of congestion, they are bad for our fragile environment, and they are bad for our health. This plan does little more than advance the status quo.</p>	

S4 Dom Harris

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S4 Dom Harris					
S4.001	Chapter 3.1A: Climate change	Issue 1: Greenhouse gas emissions must be reduced significantly, immediately and rapidly	Support in part	Interdependencies must be considered across chapters. Battling climate change and increasing pressure on housing are competing issues but one must not be sacrificed to address the other. New buildings in wellington should only be permitted if they are 'green' which includes increased densification, low emission and eco-friendly design and construction (eco-houses etc.)	This provision should link to the pressures identified on housing in subsequent chapters and support low emission urban development.
S4.002	Chapter 3.1A: Climate change	Issue 4: The impacts of climate change will exacerbate existing inequities	Support	Funding must be allocated equitably, based on the impacted number of people not the capital at risk. Concerned that wealthy suburbs in coastal areas will have an inordinate and highly inequitable allocation of resources to mitigate climate change. If the Road to Eastbourne cannot be maintained, the area should be subject to managed retreats.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S4.003	Chapter 3.8: Natural hazards	Issue 3: Climate change will increase the likelihood and consequences from natural hazard events	Support in part	Sea level rise is a longer term problem (except for certain communities) floods, and resultant slips, of which we are seeing an increasing amount, should also be expected with increasing regularity and severity. It may be necessary/beneficial to separate genuine natural hazards from hazards caused/exacerbated by climate change, as these may need to be considered differently in the near future.	Retain as notified.
S4.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Oppose in part	The last minute, unexplained and inexplicable decision not to include Johnsonville as a area for development and densification in the urban plan is absurd and counter-intuitive. It undermines the broad aspirations of the plan, and this must be reversed to enable common sense development of the region.	Enable densification in Johnsonville.
S4.005	Chapter 3.9: Regional form, design and function	Issue A: Lack of housing	Support in part	Significant hectareage of land in Wellington has sat vacant for close to a decade. The council should highlight this as a contributing factor and set out powers, actions that will be taken to encourage this land to be unlocked for housing.	Add reference to unlocking empty, unused and earthquake damaged land for housing.
S4.006	Chapter 3.9: Regional form, design and function	Issue 2: Sporadic, uncontrolled and/or uncoordinated development	Support in part	Need better planning for transport. Routes must be stood up based on expected volumes before they come on line, not after. Appropriate sequencing between transport and urban planning is required.	Appropriate sequencing between transport and urban planning is required
S4.007	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	Quality of housing is an objective, but there don't seem to be no policy or methods that will enforce it. Voluntary or suggested codes have failed and it is clear developers will always cut costs and corners. there must be regulation and enforcement in place to ensure quality and healthy housing	Include policies, methods to enforce/encourage enhanced quality of housing to implement the objective.

S53 Ellen Legg

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S53 Ellen Legg					

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S53.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions that encourage good intensification rather than greenfield.
S53.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools in addition to TDM's to allow people to use other transport options.
S53.004	General comments	General comments - overall	Support	Not stated.	Council planning, consent, and regulatory teams should be up skilled so they have greater ability to create density done well.
S53.005	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai	Retain as notified.
S53.006	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support the provisions for creating climate-resilient urban areas.	Retain as notified.
S53.007	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support the provisions supporting biodiversity.	Retain as notified.

S74 Finn Hall

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S74 Finn Hall					

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S74.001	General comments	General comments - overall	Support	<p>Kia ora,</p> <p>My name is Finn and I am 13 years old. I have lived in the Wellington Region since I was 3 years old. I am writing on behalf of my siblings, Tara (7) and Brodie (11) and myself.</p> <p>We support the Regional Policy Statement.</p>	Retain as notified.
S74.002	Chapter 3.1A: Climate change	General comments - climate change	Support	We want to see the regional council keep the good provisions like applying a climate and future proof lens to how and where we live, how we get around and becoming more modern in how we think about housing and suburbs.	Retain as notified
S74.003	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	It would be really good if the regional council could make sure we stop polluting our waterways. Our family loves camping in summer and sometimes we are near streams and rivers that aren't safe to swim in. So I support good freshwater provisions like the important Te Mana o te Wai and looking after our environment and biodiversity better.	Retain as notified
S74.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	<p>Our generation will not be as car dependent as my parents so we need you to make good decisions now so it will be easier for us to live and work in the region in the future. Even making it easier to make different choices on how we get to school would be awesome.</p> <p>We need to you put policies in place that prevent urban development creating more emissions in a time where we need to reduce them and create more choices in how we are able to travel around our region.</p>	Retain as notified.

S114 Fulton Hogan Ltd

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S114 Fulton Hogan Ltd					
S114.001	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Support in part	This introductory text sets the scene and, at a high level, discusses resource management issues facing the region. Shortages of resources, including aggregate, is often poorly understood by the general public and planners. We request that explicit mention be included in this text to help build understanding of these issues.	In Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (e) recognises the role of both natural and physical resources (including the need for building materials such as aggregate) in providing for the characteristics and qualities of well-functioning urban environments; and

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S114.002	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	This policy appears to respond to the guidance provided by the NPS-IB, which is currently in draft. This policy should respond to the final version of the NPS-IB.	Retain as notified
S114.003	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	This policy relates to renewable energy and regionally significant infrastructure. National policy direction including the proposed revision to the NES-F and NPS-HPL Include recognition of regionally and nationally significant aggregate resources. This policy would be an ideal location to provide recognition of the importance of these resources and reflect the policy direction from the national policy documents.	Add clause e) e) the need for quarrying activities to locate where aggregate (clay, silt, rock or sand) resources exist.
S114.004	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Clause h) is not clearly phrased, it is recommended that this clause be re- worded to clarify its intent.	(h) protecting the significant indigenous ecosystems and habitats of rivers and lakes with significant indigenous biodiversity values of rivers and lakes , including those listed in Table 16 of Appendix 1;
S114.005	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation	Support in part	While it is important that improvements are made where water quality outcomes are not met, the use of very directive "avoid" policies needs to be very carefully used. It is often not feasible to undertake day to day activities such as construction without having some level of discharge of sediment. If this is phrased	(b) avoiding minimising discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		disturbance - consideration		as a very stringent "avoid" policy there is the potential that a large number of typical activities could not be undertaken.	
S114.006	Appendix 3: Definitions	Maintain /maintained /maintenance: (in relation to indigenous biodiversity)	Support in part	This definition appears to respond to the NPS-IB, and should be consistent with the final version of that policy.	Retain as notified
S114.007	Appendix 3: Definitions	Regionally significant infrastructure	Support in part	Given the recognition that has been provided in national level policy such as the NES-F and NPS-HPL for aggregate extraction, we recommend that there be provision for regionally or nationally significant aggregate quarries in the definition of "regionally significant infrastructure"	Add a bullet point to the activities listed in the definition of regionally significant infrastructure. <ul style="list-style-type: none"> Aggregate extraction that provides significant national or regional public benefit that could not otherwise be achieved using resources within New Zealand.
S114.008	General comments	General comments - overall	Support in part	<p>It is critical that Regional Policy Statements (RPS) recognise and provide for the extraction of aggregate resources, as these contribute to the construction and maintenance of cost effective building, roads and housing.</p> <p>The importance of aggregate supply has been recognised in recent national policy direction such as the proposed draft of the National Environmental Standard for Freshwater (NES-F), and the National Policy Statement for Highly Productive Land (NPS-HPL). It is important that this support flows through the planning document hierarchy.</p>	Retain as notified

S76 Gene Clendon

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S76 Gene Clendon					

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S76.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support provisions ensuring that more homes do not result in more emissions. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.
S76.003	General comments	General comments - overall	Support in part	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools than TDM plans. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive, rather than diluted.
S76.004	General comments	General comments - overall	Support	Supports the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
S76.007	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Retain, refine and enhance provisions.
S76.008	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support provisions for biodiversity.	Retain, refine and enhance provisions.

S141 Generation Zero Wellington

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S141 Generation Zero Wellington					
S141.001	Chapter 3.1A: Climate change	General comments - climate change	Support	Climate change is one of the most important and pervasive issues of our time, there are few areas of our lives that climate change will not affect, and we are only just now beginning to see the effects. This is why we [the submitters] are in support of the insertion of Chapter 3.1A: Climate Change. Climate Change is a lens that needs to be applied to all decisions by regional and local governments; how will this change positively or negatively impact our climate impact, how will this allow communities to adapt to the realities of a changing climate.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S141.002	Chapter 3.1A: Climate change	Climate change introductory text	Support	<p>Supports the focus on creating an equitable transition which acknowledges the fact that the adverse effects of climate change will not be borne equally amongst the different communities that live in the Wellington region.</p> <p>Overall, the focus on climate change and equitable transitions is a step in the right direction and support the proposed changes to the Regional Policy Statement (RPS).</p>	Retain as notified.
S141.003	Chapter 3.1A: Climate change	Objective CC.3	Support	<p>Support the goal of achieving a 50% reduction in emissions by 2030. They are greatly encouraged by the Regional Councils desire to go beyond the bare minimum requirements and they fully support the creation of this ambitious yet achievable target. Wellington is well placed to be a real leader in this area and can hopefully inspire other regions to take similar steps towards a low-carbon future.</p>	Retain as notified.
S141.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	<p>Housing is another topic which touches on almost every area of our lives and we are currently facing a crisis in; Denser cities allow people to get anywhere they need without the requirement of owning a car and can help the creation of better public transport routes that serve a greater number of people, further decreasing peoples reliance on cars. Similarly, greater density can be used to create a greater supply of houses to ease the pressure on a housing market that is growing more and more inaccessible and thus gives more people the opportunity to live in a home that is stable, warm and affordable. This is just the surface level of the benefits that greater density can bring but it is a tool that has power to reshape the communities that we are living in and address some of the most pressing concerns, it's also a tool that has been severely under-utilised in recent years.</p>	Retain as notified.
S141.005	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	<p>Recognise that greater density is not a silver bullet, and employing greater density doesn't preclude the creation of new greenfield developments. Supports the introduction of the requirement for these developments to present a Travel Demand Management (TDM) plan and believe this is a good and crucial step to ensuring that any of these new developments are founded around principles of sustainable mobility. These plans will help to ensure that future generations are not locked into the car-centric design philosophies that are currently commonplace.</p>	Retain as notified.
S141.006	Chapter 4.5: Methods to	Method CC.3: Travel demand	Support	<p>Recognise that greater density is not a silver bullet, and employing greater density doesn't preclude the creation of new greenfield developments. Supports the introduction of the requirement for these developments to present a Travel</p>	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	implement policies (non-regulatory methods)	management plans		Demand Management (TDM) plan and believe this is a good and crucial step to ensuring that any of these new developments are founded around principles of sustainable mobility. These plans will help to ensure that future generations are not locked into the car-centric design philosophies that are currently commonplace.	
S141.007	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Supports the freshwater provisions in the proposed changes to the RPS. Believe that freshwater should first and foremost be considered by the value that it gives to the community and this should be placed before any value to be gained through any extractive processes. Support the strong stance provided by the environmental bottom lines in relation to freshwater pollution and all the provisions related to Te Mana o Te Wai. We also believe that Te Tiriti should play an important role in the construction of any freshwater policy and the relationship between Māori and these bodies of water should be reflected in the delivery of those policies.	Retain as notified.
S141.008	General comments	General comments - overall	Support	Supports the direction and vision that is enabled through these changes to the Regional Policy Statement, we see the need for this tool as a way to point the Wellington region along a path that supports greater climate, housing and environmental justice.	Retain as notified.

S99 Genesis Energy Limited

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S99 Genesis Energy Limited					
S99.001	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	The purpose of RPS Change 1 is to reduce GHG emissions rapidly. It is already recognized that support is required to hasten the transition of the energy economy to renewable sources. Genesis considers the current passive policy wording of 'recognising' the benefits from renewable energy does not meet the purpose of RPS Change 1 and will not induce change from the status quo. More direct and active wording is required, and can be achieved by the use of the words to 'promote and enable' as set out in the decision sought column. In addition to promoting and enabling renewable energy development, Genesis considers the policy direction should also seek to protect the benefits derived from this infrastructure from reverse sensitive effects. Renewable energy development is dependent on the ability to locate where the resource is and the benefits from renewable energy is wide reaching and extends beyond the region boundaries. The protection of these	Amend Policy 7 as shown below. Policy 7: Recognising Promote, enable and protects the benefits from renewable energy and regionally significant infrastructure - regional and district plans. District and regional plans shall include policies and/or methods that recognise : (a) Promotes and enables the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including: (i) people and goods can travel to, from and around the region efficiently and safely and in ways that support

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				benefits must be provided and is separate to the existing Policy 8 which seeks to protect regionally significant infrastructure.	<p>transitioning to low or zero carbon multi modal travel modes;</p> <p>(ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</p> <p>(iii) people have access to secure and affordable energy, maximising and preferably low or zero carbon energy sources, so as to meet their needs; and</p> <p>(iv) people have access to telecommunication services.</p> <p>(b) Promotes and enables the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</p> <p>(i) security of supply and diversification of our energy sources;</p> <p>(ii) reducing dependency on imported energy resources; and</p> <p>(iii) reducing greenhouse gas emissions.(c) Protects the social, economic, cultural and environmental benefits of renewable energy and regionally significant infrastructure from reverse sensitivity effects.</p> <p>Explanation</p> <p>Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits both within and outside the region, in particular if regionally significant infrastructure is a low or zero carbon development.</p>
S99.002	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and	Support	The promotion and enabling of all forms of renewable energy generation is required to accelerate the climate change outcomes sought by RPS Change 1.	Retain Policy 11 as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		small scale renewable energy generation - district plans			
S99.003	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	<p>For reasons set out in Policy 7 above.</p> <p>In addition, whilst wind, solar and marine are renewable energy resources currently known within the region, Genesis considers the RPS should seek to facilitate new low or zero carbon energy resources (such as biofuels) that may be identified in the future as technology advancement allows.</p>	<p>Amend Policy 39 as shown below.</p> <p>Policy 39: Recognising Promote, enable and protects the benefits from renewable energy and regionally significant infrastructure - consideration</p> <p>When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:</p> <p>(a) Promoting, enabling and protecting the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions; and</p> <p>(b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and</p> <p>(c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and</p> <p>(d) significant wind, solar and marine renewable energy resources within the region and new low or zero carbon energy resources that may be identified as technology advances.</p> <p>Explanation</p> <p>Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S99.004	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	The expansion of electricity generated from renewable sources assists in the purpose of the policy to reduce emissions. Accordingly, Genesis considers it is appropriate that the policy explicitly seeks to support and encourage the increased development in renewable electricity generation.	<p>Amend Policy 65 as shown below.</p> <p>Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory</p> <p>To support and encourage conservation and efficient use of resources by:</p> <p>(a) applying the 5 Rs (Reduce, Reuse, Recycle, Recover, and Residual waste management);</p> <p>(b) reducing organic waste at source from households and commercial premises;</p> <p>(c) increasing the diversion of wastewater sludge from wastewater treatment plants before deposition to municipal landfills;</p> <p>(d) requiring efficient municipal landfill gas systems;(e) increasing the proportion of electricity generated from renewable sources;</p> <p>(f) using water and energy efficiently; and</p> <p>(g) conserving water and energy.</p> <p>Explanation</p> <p>Policy 65 promotes the efficient use of resources to reduce emissionsand supports the expansion of electricity generation from renewable sources to assist the transition from fossil fuel dependence. The policy endorses the waste hierarchy and also promotes similar principles for efficient water and energy use.</p>
S99.005	Appendix 3: Definitions	Nature-based solutions	Support in part	Genesis considers the development of electricity from renewable sources is a nature-based solution that reduces greenhouse gas emissions whilst providing resilience for people. In taking actions to address climate change, it is necessary to consider the natural and the built environment in a holistic manner, and provide integration as much as possible.	<p>Amend the definition as follows:</p> <p>Nature-based solutions</p> <p>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, indigenous biodiversity and the natural environment to the effects of climate change.</p> <p>Examples include:</p> <p>Reducing greenhouse gas emissions (climate change mitigation):</p> <ul style="list-style-type: none"> • planting forests to sequester carbon • protecting peatland to retain carbon stores <p>Increasing resilience (climate change adaptation):</p> <p>(a) providing resilience for people</p> <ul style="list-style-type: none"> • planting street trees to provide relief from high temperatures

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<ul style="list-style-type: none"> restoring coastal dunelands to provide increased resilience to the damaging effects of storms linked to sea level rise leaving space for rivers to undertake their natural movement and accommodate increased floodwaters the use of water sensitive urban design, such as rain gardens to reduce stormwater runoff in urban areas maximising electricity generation from renewable energy sources, recognising that renewable electricity generation can often be incorporated within the natural and built environments (e.g. wind farm and carbon forestry, solar panels on rooftops) (b) providing resilience for ecosystems and species <ul style="list-style-type: none"> restoring indigenous forest to a healthy state to increase its resilience to increased climate extremes leaving space for estuarine ecosystems, such as salt marshes, to retreat inland in response to sea level rise.
S99.006	Appendix 3: Definitions	Regionally significant infrastructure	Support	Genesis considers the proposed definition is appropriate to support the provisions contained in RPS Change 1.	Retain the fifth bullet: Regionally significant infrastructure includes: ... • facilities for the generation and/or transmission of electricity where it is supplied to the National grid and/or the local distribution network

S68 Georgia Morgan

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S68 Georgia Morgan					
S68.001	General comments	General comments - overall	Support	Support, especially around travel	Retain as notified.

S52 Gerald Keown_Mangaroa Peatland Focus Group

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S52 Mangaroa Peatland Focus Group_Gerald Keown					
S52.002	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S52.003	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S52.004	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S52.005	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				individual landowners and not on single one has been consulted.	Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S52.006	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S60 Grant Buchan

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S60 Grant Buchan					
S60.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions good intensification for growth, rather than greenfield.
S60.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S60.005	General comments	General comments - overall	Support	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S60.006	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
S60.007	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support creating climate-resilient urban areas.	Retain, refine and enhance provisions.
S60.008	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support provisions supporting biodiversity.	Retain, refine and enhance provisions.

S58 Grant Munro_Mangaroa Peatland Focus Group

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S58 Mangaroa Peatland Focus Group_Grant Munro					
S58.002	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S58.003	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as	Delete the phrase "and their restoration is promoted".

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		health of water bodies - regional plans		confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S58.004	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S58.005	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S58.006	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S161 Grant O'Brien					
S161.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	Concern about the inclusion of 'restore' within this text. Although we support the restoration of ecosystems and wetlands in principal, the recent GWRC vs Adams court case has highlighted the risk that GW council officers will use this statement to support the restoration of ecosystems on an adhoc basis without proper engagement* with affected landowners and communities, significantly affecting landowners and their mental health and established property rights.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S161.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	Again, as per above, the recent GWRC vs Adams case has highlighted the fact that GWRC can and has, mis-interpreted what is considered an 'natural inland wetland', and have not considered the geomorphological and geological history of the area. Thus, until all natural inland wetlands and coastal wetlands are robustly mapped and understood and affected landowners advised, we do not support any change to this policy as the implications of the change are unknown /unpredictable for potentially affected communities. Landowners would need compensation for losses of investment and livelihood.	Delete the phrase "and their restoration is promoted".
S161.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	As per above, until 'indigenous ecosystems' and 'habitats with significant indigenous biodiversity values' are mapped and understood and affected landowners advised, we can not support the inclusion of 'adequate buffering' as it is unclear who will be affected by this and what the implication of 'buffering' is. The term adequate is also qualitative and meaningless - actual distances need to be defined using appropriate data. Landowners would need compensation for losses of investment and livelihood on their land.	Remove the phrase 'adequate buffering', until such time as areas requiring buffering are mapped and landowners affected by buffering are engaged with.
S161.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	As a resident who would be affected by this change we do not support this statement in absence of engagement to explain what is meant by 'protecting peatlands'. For example, is GW	Remove 'protecting peatlands to retain carbon stores' until the peatlands in question are mapped and understood, landowners engaged with/advised and further explanation about what is meant

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				talking about limiting earthworks or protecting the peatlands with a designation? The options are unknown and for this reason we do not support this statement at this time. Internationally recognised science-based methods need to be considered. Landowners would need compensation for losses of investment and livelihood on their land.	by 'protection'.
S161.005	Appendix 3: Definitions	Restoration	Oppose in part	Supportive of restoration in principal, however there are concerns about adequate engagement with affected communities and impacts on people's mental health and basic human rights. Concerns about previous incorrect interpretations of parts of Whitemans Valley being an 'inland wetland' and the impacts on the community of subsequent court proceedings when the area was not mapped as being significant or requiring protection.	Insert text to require GWRC to adequately map out areas requiring restoration and engage with the affected community.

S137 Greater Wellington Regional Council (GWRC)

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S137 Greater Wellington Regional					
S137.001	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Support in part	Freshwater visions in the regional policy statement will drive freshwater provisions in the Natural Resources Plan at the whitua scale. A map of whitua boundaries is therefore necessary to support the freshwater visions for each whitua.	Insert a map of whitua boundaries, exactly as shown in Attachment 2 of this submission (<i>Map of whitua boundaries to be inserted in freshwater chapter introduction</i>), into the introductory text for Chapter 3.4, with the following caption: Figure 2A: Map of whitua boundaries.
S137.002 Withdrawn 17 November 2023	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support in part	The National Policy Statement for Freshwater Management (NPS-FM) requires the regional council to not delay and implement the NPS-FM as soon as reasonably practicable. Section 3.3(1) requires that "every regional council must develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement." The regional council did not include vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in Proposed RPS Change 1 due to the desire to enable a truly partnered approach to the plan change development which was ultimately constrained by time. A number of parties have questioned this decision and expressed their expectation that freshwater vision objectives	Insert freshwater vision for Te Awarua-o-Porirua into Chapter 3.4, as shown below: Objective 12A: Freshwater vision for Te Awarua-o-PoriruaThe health and wellbeing of Te Awarua-o-Porirua and all of the waterbodies and ecosystems within Te Awarua-o-Porirua Whitua are restored, their waters are healthy and future generations are sustained, physically and culturally.Such that within 20 years:(a) The harbour, waterbodies and coast are clean and brimming with life and have diverse and healthy ecosystems,(b) The harbour, waterbodies and

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>should have been included in the Proposed RPS Change 1. The regional council now seeks to include through submissions freshwater vision (to give effect to the NPS-FM 2020) objectives for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p> <p>The visions in this submission have come from the whaitua processes for these whaitua, through input from community and mana whenua / tangata whenua.</p>	<p>coast can be used to gather and catch kaimoana and mahinga kai,(c) The harbour, waterbodies and coast flow naturally and with energy, attracting people to connect with them,(d) The harbour, waterbodies and coast are safe and accessible for people to enjoy and undertake recreational activities,(e) Te Awarua-o-Porirua is recognised (acknowledged and protected) as an ancestral treasure of Ngāti Toa Rangatira,(f) Ngāti Toa Rangatira are able to exercise its kaitiakitanga and are integral to a partnership model for the ongoing protection of the harbour and its waterways, and(g) Land is developed, used and managed to maintain or restore natural hydrology and habitat, reduce contaminant losses and minimise creation of contaminants.</p>
<p>S137.003 Withdrawn 17 November 2023</p>	<p>Chapter 3.4: Fresh water (including public access)</p>	<p>General comments - fresh water</p>	<p>Support in part</p>	<p>The NPS-FM requires the regional council to not delay and implement the NPS-FM as soon as reasonably practicable. Section 3.3(1) requires that "every regional council must develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement."</p> <p>The regional council did not include vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in Proposed RPS Change 1 due to the desire to enable a truly partnered approach to the plan change development which was ultimately constrained by time.</p> <p>A number of parties have questioned this decision and expressed their expectation that freshwater vision objectives should have been included in the Proposed RPS Change 1. The regional council now seeks to include through submissions freshwater vision (to give effect to the NPS-FM 2020) objectives for Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua.</p> <p>The visions in this submission have come from the whaitua processes for these whaitua, through input from community and mana whenua / tangata whenua.</p>	<p>Insert freshwater vision for Whaitua te Whanganui-a-Tara into Chapter 3.4, as shown below:Objective 12B: Freshwater vision for Whaitua te Whanganui-a-TaraAll freshwater bodies in Te Whanganui-a-Tara are wai ora and estuarine areas are healthy and functioning within 100 years, including:(a) The āhua of the Korokoro, Kaiwharawhara, Te Awa Kairangi, Wainuiomata, and Ōrongorongo Awa and Parangārehu Lakes is fully restored(b) Mana Whenua are the lead agency and regulator for protection and restoration of wai ora in 20 to 50 years' time(c) Tamariki support mātua, tuākana and whānau, hapū and iwi to restore and protect awa using tools like iwi kaitiaki plans within 20 years.(d) Pakeke are active in paid mana whakahaere roles overseeing monitoring, management, and improvement of wai ora in 20 years.(e) Taiohi are active kaitiaki and kaikohikai in the wider catchment and are inducted into wai ora monitoring programmes like Ngā Mangai Waiora (ambassadors</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>for water) within 20 years.(f) All waterbodies in Te Whanganui-a-Tara are suitable for primary contact/kaukau (swimming) by 2041.(g) Native fish have access to move freely up and down the entire length of the catchment to complete their life cycle within 20 years.(h) Iwi can safely harvest and eat (identified species) of local mahinga kai throughout the catchment in 20 years.(i) Mahinga kai species are plentiful enough in all catchments for long term harvest including for manuhiri and to exercise manaakitanga within 20 years.(j) The mauri/mouri and life-supporting capacity of water in Te Whanganui-a-Tara enables the customary practices of Mana Whenua such as tohi, whakarite, whakawātea manaakitanga at a range of places throughout the whaitua.(k) The mana of water as a source of life is restored including regarding and respecting all waterbodies (including āku waiheke), repo (wetland) and estuaries as living entities,(l) All freshwater bodies are allowed to exhibit their natural rhythms, natural form, hydrology and character, including through a range of flows over the seasons.(m) There are sufficient flows and levels to support connectivity throughout mai i uta ki tai and between rivers and their banks to support spawning fish.(n) Key areas such as te mātāpuna (headwaters), estuaries and repo (wetland) are protected and restored so that they support healthy functioning ecosystems.</p>
S137.004	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal	Support in part	Amendments to wording for consistency with Policy 12. Addition of 'urban' for clarity on development referred to.	Amend Policy 14 as follows: Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, and methods including rules that, must give effect to Te Mana o te Wai and in doing so must: ...

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		marine area - regional plans			(e) Require the urban development, including stormwater discharges, earthworks and vegetation clearance to meet any limits set in a regional plan;
S137.005	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Amendments are required to improve readability.	Amend Policy 18 as follows: ... (c) ensuring there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted; ... (h) ensuring F freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;
S137.006	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	Amendments to align with wording in section 30 of the Resource Management Act.	Amend Policy FW.6 as follows: (a) Wellington Regional Council has primary responsibility for freshwater. Wellington Regional Council shall be responsible for the control of the use and development of land for the purposes of maintenance and enhancement of water quality and ecosystems in water bodies, and maintenance of water quantity water quality and quantity .
S137.007	Chapter 3.1A: Climate change	Objective CC.3	Support in part	Insert 'contribute to' into clause (b) for consistency with clause (a).	Clause (b) to read: (b) By 2050, to contribute to achieving net-zero emissions.
S137.008	Appendix 3: Definitions	General comments - definitions	Support in part	It is more appropriate for the definition for climate resilient urban areas to sit within the definitions section of the document rather than in the explanation. This will assist with clarity and achieving the policy intent.	Insert a new definition for 'climate resilient urban areas' using the text currently in the explanation of Policy CC.4, as below: Climate resilient urban areas: Means urban areas that have the ability to withstand: • Increased temperatures and urban heat island • Increased intensity of rainfall and flooding • Droughts and urban water scarcity and security • Increased intensity of wind, cold spells, landslides, fire, and air pollution.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S137.009	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	Amendments are required to improve readability and consistency with Policy CC.1.	Amend Policy CC.9 as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and or development have has been planned in a way that contributes to reducing greenhouse gas emissions by to optimise optimising overall transport demand, maximising mode shift from private vehicles to public transport or active modes, and supporting the move towards low and zero-carbon modes in a way that contributes to reducing greenhouse gas emissions.
S137.010	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Amendments are required to improve readability and clarity.	Amend Policy CC.14 as follows: ... (a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working and work towards achieving a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050... (f) promoting buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.
S137.011	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Clarify the need to resource and implement the climate change extension programme.	Amend Method CC.8 as follows: By June 2024, develop and implement a targeted climate change extension programme to actively promote and support changes to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change, including by:
S137.012	Chapter 4.5: Methods to implement policies	Method CC.2: Develop carbon emissions	Oppose	This method is no longer necessary. It was developed to implement an earlier iteration of Policy CC.8, which took a more complex approach to dealing with offsetting. Policy CC.8 (as notified) does not require a method requiring offset guidelines to be developed as it prioritises reducing emissions over offsetting.	Remove Method CC.2 from Proposed RPS Change 1.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	(non-regulatory methods)	offsetting guidance			
S137.013	Appendix 3: Definitions	Highly erodible land	Support in part	<p>Amend the definition to remove the confusion introduced by referring to two different approaches to identify areas at risk of erosion. The proposed amendment aligns with the definition for highly erodible land used by MFE and Statistics NZ to inform national erosion management policy and state of the environment monitoring, with a spatial digital layer already available.</p> <p>The erosion susceptibility classification used in the National Environmental Standards for Plantation Forestry 2017 (NES-PF) was developed to inform good plantation forestry practice specifically to implement the NES-PF, rather than identifying priority areas for recovering forest cover. This classification captures only a small sub-set of highly erodible land. The RPS policy intent is to increase forest extent on a much wider area of eroding hill country.</p>	<p>Amend the definition as shown below: Highly Erodible Land Means IL Land at risk of severe erosion (landslide, earthflow, and gully) if it does not have a protective cover of deep-rooted woody vegetation. Land classified as very high (red) according to the erosion susceptibility classification in the National Environmental Standards for Plantation Forestry 2017.</p>
S137.014	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support in part	<p>Proposed RPS Change 1 as notified does not specifically address public transport vehicle fleets reducing emissions, which is identified as an outcome in Objective CC.3 seeks (among other things) that public transport emissions are reduced by 20% from 2018 levels. However, there is no policy or method to implement this part of the objective. Policy 9 and Method CC.10, which link to Objective CC.3, should be amended to reflect this outcome sought.</p>	<p>Amend Policy 9 as follows: The Wellington Regional Land Transport Plan shall include objectives and policies that promote: ... (c) increasing the uptake of low emission or zero carbon fuels, biofuels and new technologies.; and</p>
S137.015	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land	Support in part	<p>Proposed RPS Change 1 as notified does not specifically address public transport vehicle fleets reducing emissions, which is identified as an outcome in Objective CC.3 seeks (among other things) that public transport emissions are reduced by 20% from 2018 levels. However, there is no policy or method to implement this part of the objective. Policy 9 and Method CC.10, which link to Objective CC.3, should be amended to reflect this outcome sought.</p>	<p>Insert new clause: (d) the decarbonisation of the public transport vehicle fleet.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		Transport Plan			
S137.016	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support in part	<p>The notified heading does not reflect the method as well as it could.</p> <p>A minor change to ensure 'low and zero-carbon' is consistently referred to, and to reflect the direction to decarbonise public transport included in Policy 9.</p>	<p>Amend Method CC.10 as follows: Method CC.10: Establish incentives to shift to low and zero-carbon multi modal transport active and public transport</p> <p>Establish, support and promote a range of incentives for uptake of low and zero-carbon zero and low-carbon multi modal transport, including public transport, to reduce greenhouse gas emissions, and to support an equitable and inclusive transition.</p>
S137.017	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support in part	Amendments are required to improve readability and clarity.	<p>Amend Policy EIW.1 as follows: The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle.,- by contributing to reducing greenhouse emissions.</p>
S137.018	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Amendments are required to improve readability and clarity.	<p>Amend Policy 24 as follows: By 30 June 2025, district and regional plans shall include policies, rules and/or methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development.</p>
S137.019	Chapter 4.1:	Policy 24: Protecting indigenous	Support in part	Amendments are required to improve readability and clarity.	Amend Policy 24 as follows:

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regulatory policies	ecosystems and habitats with significant indigenous biodiversity values - district and regional plans			<p>Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall:</p> <p>(a) not provide for biodiversity offsetting:</p> <p>(i) where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or</p> <p>(ii) when an activity is anticipated to cause residual adverse effects on an area after an offset has been implemented, if the ecosystem or species is threatened, or the ecosystem is naturally uncommon;</p> <p>(b) not provide for biodiversity compensation where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally uncommon;and (c) ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation);</p> <p>(d) require that the outcome sought from the use of biodiversity offsetting is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit.Ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation).</p>
S137.020	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values -	Support in part	Amendments are required to improve readability and clarity.	Add to bottom of explanation: Policy 47 determines which activities are 'inappropriate', being those that may adversely affect certain key ecological characteristics of an area.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		district and regional plans			
S137.021	Chapter 4.3: Allocation of responsibilities	Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	Support in part	Amendments to Policy 61 are required to align with direction in Policy FW.6 on freshwater jurisdiction.	Amend Policy 61 as follows: ... (c) city and district councils shall be responsible for developing objectives, policies, rules and/or methods in district plans for the control of the use of land for the maintenance of indigenous biodiversity, including adverse effects on indigenous biodiversity in freshwater bodies. This excludes the management of land within the coastal marine area and the beds of lakes and rivers.
S137.022	Appendix 3: Definitions	Biodiversity compensation	Support in part	Amend to align with the offsetting definition and the similar definition in the National Policy Statement for Indigenous Biodiversity exposure draft. Also amend to reflect the fact that we are directing a net benefit outcome from the use of compensation.	Amend definition as follows: Biodiversity compensation A measurable positive environmental outcome resulting from actions that are designed to compensate for residual adverse biodiversity effects that cannot be otherwise managed after avoidance, minimisation, remediation, and biodiversity offset measures have been applied.
S137.023	Appendix 3: Definitions	Biodiversity offsetting	Support in part	Delete appropriate as it is imprecise. Also amend to reflect the fact that we are directing a net gain outcome from the use of offsetting.	Amend definition as follows: Biodiversity offsetting A measurable positive environmental outcome resulting from actions designed to redress for the residual adverse effects on biodiversity arising from activities after appropriate avoidance, minimisation, and remediation measures have been applied. The goal of biodiversity offsetting is to achieve no net loss, and preferably at least a 10 percent net gain, of indigenous biodiversity values.
S137.024	Appendix 3: Definitions	Ecological integrity	Support in part	Amend to align with the National Policy Statement for Indigenous Biodiversity exposure draft.	Amend definition as follows: Ecological Integrity The full potential of indigenous biotic and abiotic features and natural processes, functioning in sustainable communities, habitats, and landscapes. Means the extent to which an ecosystem is able to support and maintain its:(a) composition (being its natural diversity of indigenous species, habitats, and communities);

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					and(b) structure (being its biotic and abiotic physical features); and (c) functions (being its ecological and physical processes)
S137.025	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Amendments are required to improve clarity and consistency, and to provide certainty that for the hazard provisions to be successful in district plans they need to be linked to hazard overlays.	Amend Clause (d) of Policy 29 as follows: ... (d) use a risk-based approach to assess the consequences to new or existing subdivision, use and development from natural hazard and climate change impacts over a 100 year planning horizon;
S137.026	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Amendments are required to improve clarity and consistency, and to provide certainty that for the hazard provisions to be successful in district plans they need to be linked to hazard overlays.	Amend Clause (e) and (f) in Policy 29 to read: (e) include hazard overlays , objectives, polices and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (f) include hazard overlays , objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.
S137.027	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Amendments are required to improve clarity.	Amend Policy 52 as follows: ... (c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, or regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard management strategy agreed to by relevant authorities , that represents the best practicable option for the future;
S137.028	Chapter 4.5:	Method 14: Information	Support in part	Amendments are required to reflect the intent of the method.	Amend Clause (b) in Method 14 to read: (b) raise awareness and understanding of natural hazards and

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Methods to implement policies (non-regulatory methods)	on natural hazards and climate change			climate change.
S137.029	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	This objective is drafted more in the style of a policy rather than an outcome. Amendment to the chapeau is required to address this.	Amend Objective 22 as follows: Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning urban environments, which:
S137.030	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.
S137.031	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.
S137.032	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.
S137.033	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		reduction in transport related greenhouse gas emissions - Regional Land Transport Plan			
S137.034	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.
S137.035	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.
S137.036	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.
S137.037	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		the qualities and characteristics of well-functioning urban environments - non-regulatory			
S137.038	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Add 'improving' into clause (a) for consistency with Policy 31.	Amend clause (a) to read: (a) the urban proposed development is the most appropriate option to achieve Objective 22 contributes to establishing, improving or maintaining the qualities and characteristics of a well-functioning urban environment, including:
S137.039	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Amendment of the wording of clause (a)(ii)(1) is required to amend an error, in that the notified version uses the language from an older version of Policy 29.	Amend subclause (a)(ii)(1) to read: (ii) the location, design and layout of the proposed development shall apply applies the specific management or protection for values or resources identified by this Regional Policy Statement RPS , including by: 1. Avoiding inappropriate Managing subdivision, use and development in accordance with the risk areas at from natural hazards as required by Policy 29;
S137.040	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Amendments are required to improve readability, consistency and clarity, including fixing references to policy numbers. Ensure reference to 'low and zero-carbon multi modal transport' is consistent with other provisions.	Amend subclause (a)(ii)(6) to read: 6. Providing for climate resilience and supportings a low or and zero-carbon multi modal transport network consistent with Policies CC.1, CC.4, CC.910 and CC147;
S137.041	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Amendments are required to improve readability, consistency and clarity, including fixing references to policy numbers.	Amend clause (d) to read: (d) the Any urban development that would provide for significant development capacity as outlined in Policy UD.3 , regardless of if the development was out of sequence or unanticipated by growth or development strategies.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S137.042	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Amendments are also required to align with the National Policy Statement for Highly Productive Land 2022. NPS-HPL Policy 2 requires that the identification and management of highly productive land is undertaken in an integrated way, considering interactions with freshwater and urban development.	Insert a new subclause (a)(ii)(9) to read: 9. Protecting highly productive land for use in land-based primary production consistent with Policies 56 and 59; and
S137.043	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Amendments are also required to align with the National Policy Statement for Highly Productive Land 2022. NPS-HPL Policy 2 requires that the identification and management of highly productive land is undertaken in an integrated way, considering interactions with freshwater and urban development.	Insert a new sentence in the Explanation section Explanation ... Clause (a) also aligns with direction from the National Policy Statement for Highly Productive Land 2022 to protect highly productive land for use in land-based primary production.
S137.044	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Amendments are required to align with the National Policy Statement for Highly Productive Land 2022. The addition of cultural values is to incorporate feedback received on the draft RPS Change 1.	Amend clause (b) to read: (b) the proposal will reduce aesthetic, cultural and open space values in rural areas between and around settlements;
S137.045	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Amendments are required to align with the National Policy Statement for Highly Productive Land 2022. The addition of cultural values is to incorporate feedback received on the draft RPS Change 1.	Insert new clause (c) (c) the proposal will lead to subdivision, rezoning to urban or rural lifestyle, use or development of highly productive land not otherwise provided for by exceptions in clauses 3.6, 3.8, 3.9 or 3.10 of the National Policy Statement for Highly Productive Land 2022;
S137.046	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Amendments are required to align with the National Policy Statement for Highly Productive Land 2022. The addition of cultural values is to incorporate feedback received on the draft RPS Change 1.	Insert a sentence in the Explanation section: In addition to direction in Policy 59, Policy 56 aligns with direction from the National Policy Statement for Highly Productive Land 2022 to protect highly productive land for use in land-based primary production.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S137.047	Appendix 3: Definitions	General comments - definitions	Support in part	A new definition is required to support submission points on Policies 55 and 56 until maps of highly productive land are operative in the RPS. The proposed submission aligns with NPS-HPL 2022 clause 3.5(7).	Insert new definition as shown below: Highly Productive Land Until highly productive land is mapped and operative in this Regional Policy Statement, highly productive land refers to land that, as of 17 October 2022: <ul style="list-style-type: none"> • Is zoned general rural or rural production and is Land Use Capability 1, 2, or 3 land; and • Is not identified for future urban development or subject to a Council initiated or adopted notified plan change to rezone it to urban or rural lifestyle.
S137.048	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Amendments are required to improve readability, consistency and clarity, and reduce duplication. Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.	Amend Policy UD.3 as shown below: Policy UD.3: Responsive planning to unanticipated or out-of-sequence developments that provide for significant development capacity - consideration
S137.049	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Add 'improving' into clause (a)(i) for consistency with Policy 31.	Amend clause (a)(i) to read: (a) the location, design and layout of the proposal: (i) contributes to establishing, improving or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22;
S137.050	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Amendments are required to improve readability, consistency and clarity, and reduce duplication. Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.	Amend clause (c)(ii) to read: (ii) is likely to will be realised in a timely (i.e., rapid) manner, and earlier than the anticipated urban development;

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S137.051	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p> <p>Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.</p>	Delete clause (c)(iii)
S137.052	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p> <p>Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.</p>	Amend clause (c)(iv) to read: (iv viii) will facilitate a net increase in district-wide development uptake up-take in the short to medium term;
S137.053	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p> <p>Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.</p>	Amend clause (d) to read: (d) the required development infrastructure can be provided effectively and efficiently for the proposal, and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term.
S137.054	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p> <p>Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.</p>	Amend policy to read: When considering a change of a district plan for a development, to determine whether it provides significant development capacity in accordance with clause (d) of Policy 55, particular regard shall be given to whether all of the following criteria is are met:

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S137.055	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support in part	Amendments are required to improve readability, consistency and clarity. Add 'improve' into heading and wording for consistency with Policy 31.	Amend Policy 67 as shown below: Policy 67: Establishing, improving and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory To establish, improve and maintain and enhance the qualities and characteristics of well-functioning urban environments
S137.056	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Support in part	Amend to explicitly require consideration of the impacts of climate change in the preparation of the Future Development Strategy, to implement Objective CC.1 and Policy 55.	Amend Method UD.2 as below: ... The Future Development Strategy will provide a framework for achieving Well-Functioning Urban Environments in the Wellington Region, including specifying how and where future growth will occur to provide for sufficient capacity to meet future growth needs over the next 30 years, and considering the impacts of climate change.
S137.057	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Support in part	Greater Wellington considers a new non-regulatory method to support Policy CC.11 is required. This will assist with implementation of the policy.	Under Chapter 4.5.2 - Non-regulatory methods - information and guidance, insert a new method CC.3A as follows: Method CC.3A - Whole of life carbon emissions assessments Develop information to support the development of whole of life carbon emission assessments, in accordance with Policy CC.11. Implementation: Wellington Regional Council
S137.058	Chapter 3.1A: Climate change	Objective CC.5	Support in part	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and particularly in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon	Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				sink. Amendments are required to make the intent clear.	
S137.059	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and particularly in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon sink. Amendments are required to make the intent clear.	Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.
S137.060	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and particularly in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon sink. Amendments are required to make the intent clear.	Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.
S137.061	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Support in part	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and particularly in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon sink. Amendments are required to make the intent clear.	Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.
S137.062	Appendix 3: Definitions	General comments - definitions	Support in part	Including a definition for 'minimise' would assist with clarity for the natural hazards provisions. Greater Wellington proposes to use the Natural Resources Plan definition for minimise, which was agreed to by all appellants.	Insert new definition as shown below: MinimiseReduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S137.063	Appendix 3: Definitions	Emissions	Oppose	Emissions is a generic term that applies to more than just greenhouse gases, however the notified definition only refers to greenhouse gases. It would be appropriate to remove this definition and instead amend the definition for 'greenhouse gases' to refer to 'greenhouse gas emissions'.	Remove definition for Emissions.
S137.064	Appendix 3: Definitions	Greenhouse gases	Support in part	Amend definition for greenhouse gases to refer to greenhouse gas emissions, to support the removal of the definition for emissions.	Amend the definition to read: Greenhouse Gases Emissions Atmospheric gases that trap or absorb heat and contribute to climate change. The gases covered by the Climate Change Response Act 2002 are The release of carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), or sulphur hexafluoride (SF6) into the atmosphere, where they trap heat or radiation and contribute to climate change.

S94 Guardians of the Bays Incorporated

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S94 Guardians of the Bays Incorporated					
S94.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	General comments - Chapter 3	Support	Not stated	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S94.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1: Adverse impacts on natural environments and communities	Support	Not stated	Retain as notified
S94.003	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Support	Not stated	Retain as notified
S94.004	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve	Overarching Issue 3: Lack of mana whenua / tangata whenua involvement in decision making	Support	Not stated	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	the objectives in the Regional Policy Statement				
S94.005	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support	Not stated	Retain as notified
S94.006	Chapter 3.1A: Climate change	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support	Not stated	Retain as notified
S94.007	Chapter 3.1A: Climate change	Objective CC.3	Support	Not stated	Retain as notified
S94.008	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	Not stated	Retain as notified
S94.009	Chapter 3.3: Energy,	General comments - energy,	Support	Not stated	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	infrastructure and waste	infrastructure and waste			
S94.010	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Not stated	Retain as notified
S94.011	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Not stated	Retain as notified
S94.013	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Supports ensuring more homes do not mean more greenhouse emissions, but suggests a more inter-regional transport framework through rail and sea rather than flying (emissions).	Amend the provision to address the relief sought in the submission.
S94.014	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Support in part	Supports the proposed amendments to the chapter, such as the new climate change topic and policies and considers the need for inter-regional, national and internal transport framework (primarily rail and sea) with less reliance of transport modes that rely on high greenhouse emissions.	Insert a new policy to support inter-regional, national and internal transport connections that are less reliant on high greenhouse emissions.
S94.015	Chapter 4.2: Matters to be considered	General comments - consideration policies	Support	Not stated	Retain as notified
S94.016	Chapter 4.3: Allocation of responsibilities	General comments - allocation of responsibilities	Support	Not stated	Retain as notified
S94.017	Chapter 4.4: Non-regulatory policies	General comments - non-regulatory policies	Support	No reasons given	Retain as notified
S94.018	Chapter 4.5: Methods to	General comments - regulatory methods	Support	Not stated	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	implement policies (regulatory methods)				
S94.019	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Support	Not stated	Retain as notified
S94.020	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	General comments - anticipated environmental results	Support	Not stated	Retain as notified
S94.021	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support	Not stated	Retain as notified
S94.022	Appendix 3: Definitions	General comments - definitions	Support	Not stated	Retain as notified
S94.023	Chapter 3.1A: Climate change	General comments - climate change	Support	Not stated	Retain as notified
S94.024	Chapter 3.8: Natural hazards	General comments - natural hazards	Support	Not stated	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S104 Hamish McDonald_Mangaroa Peatland Focus Group					
S104.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S104.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S104.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S104.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					implications around and compensation for any loss of use by landowners.
S104.005	Appendix 3: Definitions	Restoration	Oppose in part	<p>The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included.</p> <p>Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.</p>	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S70 Harmony Energy NZ #2 Limited

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S70 Harmony Energy NZ #2 Limited					
S70.001	Chapter 3.1A: Climate change	Objective CC.3	Support in part	<p>Although RPS PC1 provides a high level policy framework for considering utility scale RE generation, it does not require plans to promote and enable new generation via rules - except with regard to very small scale development.</p> <p>The absence of prescriptive rules appears to be a gap that does not adequately reflect intentions signaled by other parts of the RPS PC1, including policies 7, 39 and 11. There are very strong intentions signaled by Section 3.1A "Climate Change". Among other things, this includes "key areas of action required to address climate change". That is, "Reduce gross greenhouse gas emissions. This includes transitioning as rapidly as possible from fossil fuels to renewable energy".</p> <p>We believe that Adoption of the policy package Option 3 provides a stronger framework for achieving the core objectives of CC.3. Namely to reduce net emissions by 50% from 2019 levels by 2030, with net zero by 2050.</p>	Adoption of Policy package Option 3 (alternative with additional measures)

S24 Helen Payn

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S24 Helen Payn					
S24.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools, besides TDM plans, provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S24.002	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.
S24.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Creating climate-resilient urban areas is supported.	Retain, refine and enhance provisions.
S24.004	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	The biodiversity provisions are supported.	Retain, refine and enhance provisions.
S24.005	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions good intensification for growth, rather than greenfield.

S128 Horticulture New Zealand

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S128 Horticulture New Zealand					

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S128.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1: Adverse impacts on natural environments and communities	Support in part	Highly productive land is a finite resource that is impacted and lost through 'inappropriate and poorly managed use and development' - this reflected in parts of the operative RPS and should be carried through into/reflected in the overarching resource management issues for the Wellington Region.	Amend paragraph 1 (p. 4) 1. Adverse impacts on natural environments and communities Inappropriate and poorly managed use and development of the environment, including both urban and rural activities, have damaged and continue to impact the natural environment, increase greenhouse gas emissions, destroying ecosystems, degrading water, result in loss, fragmentation or reverse sensitivity effects on highly productive land , adversely impacting the relationship between mana whenua and the taiao, and leaving communities and nature increasingly exposed to the impacts of climate change.
S128.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support	Integrated management is a key theme of national direction, such as the NPSFM 2020 and supports this.	Retain as notified.
S128.003	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The introductory text outlines the context for climate change in the region and key issues relating to climate change. Support the acknowledgement of the provision of food as an ecosystem service in (2) and in (3) that the risks associated with natural hazards exacerbated by climate change can have impacts on food production and water security; however an amendment is sought to note also food security.	Amend paragraph 3 (p. 10) 3. The risks associated with natural hazards are exacerbated by climate change The hazard exposure of our communities, land, infrastructure, food security (including mahinga kai) and water security is increasing because of climate change impacts on a range of natural hazards...

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S128.004	Chapter 3.1A: Climate change	Objective CC.1	Support	Support climate change mitigation and adaptation being integral to sustainable air, land, freshwater and coastal management, well-functioning urban environments and rural areas and well-planned infrastructure.	Retain as notified.
S128.005	Chapter 3.1A: Climate change	Objective CC.3	Support in part	Further clarity could be provided around the analysis supporting the reduction should in the stated timeframes. Seeks that the approach in the RPS is to enable transition (rather than just limiting increases in emissions), as punitive policies are already provided through pricing tools such as the Emissions Trading Scheme.	Retain subject to further clarity, and a policy approach of enabling transition.
S128.006	Chapter 3.1A: Climate change	Objective CC.4	Support	It is noted that the National Adaptation Plan seeks to prioritise nature-based solutions where possible and to increase their integration into urban form, and support for working with nature to build resilience. Generally supports this outcome, where it is possible, also while recognising that additional solutions will be needed. The wording in the objective of nature-based solutions being an 'integral part' of climate change mitigation and adaptation, in our view acknowledge they will not be the only part - which is important to acknowledge. For example, water infrastructure will be critical in enabling the horticulture sector to adapt to the changing climate, while reducing impacts on ecosystems and safeguarding the HPL resource for future generations.	Retain as notified.
S128.007	Chapter 3.1A: Climate change	Objective CC.6	Support	Resilience to the effects of climate change is important and should be recognised and enabled.	Retain as notified
S128.008	Chapter 3.1A: Climate change	Objective CC.7	Support	Partnerships such as He Waka Eke Noa will assist growers to understand their operation in the context of climate change.	Retain as notified
S128.009	Chapter 3.8: Natural hazards	Natural hazards introductory text	Support in part	As noted in the Section 32 report, 'Shifting and more variable weather patterns threaten food production, and ...', consequential to this are impacts on food security.	Amend paragraph 1 (p.69) 1. Risks from natural hazards Natural hazard events in the Wellington region have an adverse impact on people and communities, food production and food security , businesses, property and infrastructure.
S128.010	Chapter 3.8: Natural hazards	Objective 19	Support in part	Natural hazards pose a risk to essential human health needs including food production, as these events can disrupt food supply. Natural hazard events (e.g., frequency of flood, drought) are set to be worsened by climate change.	Amend Objective 19, The risks and consequences to people, communities, food production and food security , their businesses, property, and infrastructure and the environment from natural hazards and the effects of climate change effects

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					are reduced minimised .
S128.011	Chapter 3.8: Natural hazards	Objective 20	Support in part	The drafting of this objective could be clearer, i.e. to confirm if the 'minimise' direction applies to both parts of the following sentence. HortNZ support the 'minimise' direction in the objective, as avoidance of any impacts on for example natural processes, will not always be possible. Does not support the explanation in the 'summary of amendments' table preceding the provisions (while recognising this is not part of the plan change) - which states "Amendment to add direction that natural hazard mitigation and adaption cannot have adverse environmental effects".	Consider clarifying the drafting of Objective 20. Retain 'minimise' policy direction in respect of managing the effects that may be associated with natural hazard and climate change mitigation and adaptation activities.
S128.012	Chapter 3.8: Natural hazards	Objective 21	Support in part	Generally support the objective of strengthening resilience, however it seeks an amendment to specially reference food production, as one of the components of resilience. Natural hazards (and the effects of climate change) pose a risk to essential human health needs including food production, as these events can disrupt food supply. The Paris Agreement speaks to speaks to a 'fundamental priority of safeguarding food security' and action in a manner that does not threaten food production.	Amend Objective 21 The resilience of our communities, including food production and food security , and the natural environment to the short, medium, and long-term effects of climate change, and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.
S128.013	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	<p>It is noted that a focus of Proposed Change 1 is to addressing the lack of urban development capacity and the interface between urban development and freshwater.</p> <p>It would be remiss in our view to not include a productive and sustainable rural environment in planning provisions regarding regional form, design and function. In particular, the RPS should protect highly productive land for food production and from reverse sensitivity.</p> <p>The NPSHPL notes that there needs to be integration in the management of HPL with freshwater management and urban development The Wellington Regional Growth Framework (WRGF) which this RPS acknowledged in their constraints analysis:</p> <ol style="list-style-type: none"> 1. highly productive land (as Wāhi Toitū) 2. high quality soils (as Wāhi Toiora). <p>The WRGF noted that the Wairarapa and Horowhenua contain important areas of highly productive land (noting the boundary of this work extended into the Horizons region).</p>	Add a paragraph in chapter introduction The region also includes highly productive land, a finite resource which has long-term values for land-based primary production, including for food security.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				The amendments sought seek to acknowledge the highly productive land resource as part of these provisions.	
S128.014	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	<p>It is noted that a focus of Proposed Change 1 is to addressing the lack of urban development capacity and the interface between urban development and freshwater.</p> <p>It would be remiss in our view to not include a productive and sustainable rural environment in planning provisions regarding regional form, design and function. In particular, the RPS should protect highly productive land for food production and from reverse sensitivity.</p> <p>The NPSHPL notes that there needs to be integration in the management of HPL with freshwater management and urban development The Wellington Regional Growth Framework (WRGF) which this RPS acknowledged in their constraints analysis: 1. highly productive land (as Wāhi Toitū) 2. high quality soils (as Wāhi Toiora).</p> <p>The WRGF noted that the Wairarapa and Horowhenua contain important areas of highly productive land (noting the boundary of this work extended into the Horizons region).</p> <p>The amendments sought seek to acknowledge the highly productive land resource as part of these provisions.</p>	Amend, paragraph 9 (p. 79) We need to recognise and provide for other regionally significant values and features, including managing freshwater, indigenous biodiversity, highly productive land , values of significance to mana whenua / tangata whenua and management of the coastal environment.
S128.015	Chapter 3.9: Regional form, design and function	Issue B: Inappropriate development	Support in part	<p>It is noted that a focus of Proposed Change 1 is to addressing the lack of urban development capacity and the interface between urban development and freshwater.</p> <p>It would be remiss in our view to not include a productive and sustainable rural environment in planning provisions regarding regional form, design and function. In particular, the RPS should protect highly productive land for food production and from reverse sensitivity.</p> <p>The NPSHPL notes that there needs to be integration in the management of HPL with freshwater management and urban development The Wellington Regional Growth Framework (WRGF) which this RPS acknowledged in their constraints analysis: 1. highly productive land (as Wāhi Toitū) 2. high quality soils (as Wāhi Toiora).</p>	Amend issue B. Inappropriate and poorly managed urban land use and activities in the Wellington region have damaged, and continue to jeopardise, the natural environment, result in loss, fragmentation or reverse sensitivity effects on highly productive land , degrade ecosystems, particularly aquatic ecosystems, and increased the exposure of communities to the impacts of climate change. This has adversely affected mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>The WRGF noted that the Wairarapa and Horowhenua contain important areas of highly productive land (noting the boundary of this work extended into the Horizons region).</p> <p>The amendments sought seek to acknowledge the highly productive land resource as part of these provisions.</p>	
S128.016	Chapter 3.9: Regional form, design and function	Issue 2: Sporadic, uncontrolled and/or uncoordinated development	Support in part	<p>It is noted that a focus of Proposed Change 1 is to addressing the lack of urban development capacity and the interface between urban development and freshwater.</p> <p>It would be remiss in our view to not include a productive and sustainable rural environment in planning provisions regarding regional form, design and function. In particular, the RPS should protect highly productive land for food production and from reverse sensitivity.</p> <p>The NPSHPL notes that there needs to be integration in the management of HPL with freshwater management and urban development The Wellington Regional Growth Framework (WRGF) which this RPS acknowledged in their constraints analysis:</p> <ol style="list-style-type: none"> 1. highly productive land (as Wāhi Toitū) 2. high quality soils (as Wāhi Toiora). <p>The WRGF noted that the Wairarapa and Horowhenua contain important areas of highly productive land (noting the boundary of this work extended into the Horizons region).</p> <p>The amendments sought seek to acknowledge the highly productive land resource as part of these provisions.</p>	<p>Retain with amendments.</p> <p>(c) the loss of rural or open space land, including, valued for its productive, ecological, aesthetic and recreational qualities, including highly productive land and it's long-term environmental, social, cultural and economic values.</p>
S128.017	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	<p>The RPS should protect highly productive land for food production and from reverse sensitivity. The highly productive land resource need to be acknowledged and reiterated in the text. A more explicit reference to highly productive land is warranted.</p> <p>It is not clear that this is currently provided for within the 'significant values and features' identified within the RPS. Strategic management of highly productive land is critical.</p>	<p>(e) Achieve the objectives in this RPS relating to the management of air, land (particularly highly productive land and reserve sensitivity), freshwater, coast, and indigenous biodiversity; and</p>
S128.018	Chapter 3.9: Regional form, design and function	Objective 22B	Support in part	<p>The RPS should protect highly productive land for food production and from reverse sensitivity. The highly productive land resource need to be acknowledged and reiterated in the text. A more explicit reference to highly productive land is warranted.</p>	<p>Amend Objective 22B</p> <p>Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features identified in this RPS and highly productive land are managed</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				It is not clear that this is currently provided for within the 'significant values and features' identified within the RPS. Strategic management of highly productive land is critical.	effectively.
S128.019	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support in part	In the operative RPS, policy 2 is linked to Objective 1 (relating to amenity and peoples wellbeing in relation to odour, smoke and dust) and Objective 2 (human health in relation to fine particulate matter). It may be more logical to include new direction relating to greenhouse gases in standalone policy linked to the climate change objectives (e.g., Objective CC.3). It is unclear why the explanation in relation to the existing part of the policy is proposed to be deleted. The Explanation text refers to large-scale industrial boilers, rather the defined term 'large scale generators	Retain Policy 2 as per the operative RPS and include greenhouse gas emissions as a standalone policy. AND Align the policy wording with upcoming national direction.
S128.020	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support in part	Greenhouses that require heating do in some part of the country rely on coal as a fuel source. Support the direction to 'support industry to reduce greenhouse gas emissions from industrial processes' - this implies enabling actions that support transition to alternative fuels. The Emissions Reduction Plan seeks to: "Ban new low- and medium-temperature coal boilers and phase out existing ones by 2037".	Add a new subclause (e) avoid new coal boilers or the use of coal as a fuel source for domestic fires and large-scale generators
S128.021	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and	Support in part	Align the policy wording with upcoming national direction. The Emissions Reduction Plan seeks to: "Ban new low- and medium-temperature coal boilers and phase out existing ones by 2037".	Amend subclause (d) as follows: (d) phase-out coal as a fuel source for domestic fires and large-scale generators by 2037.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		reducing greenhouse gas emissions - regional plans			
S128.022	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	<p>A nationally consistent approach to phase out is preferred for industrial process heat using coal as a fuel source.</p> <p>The term 'management practices' may be too specific and granular in scale - reflecting that at an on-farm management scale there may be trade-offs to be made between other outcomes such as those relating to freshwater and biodiversity. The wording 'change in intensity or type of agricultural land use' which is used in Policy CC.13 is considered more appropriate in terms of the level at which a regional plan might regulate.</p>	<p>Amend.</p> <p>Regional plans shall include objectives, policies, rules and/or methods to: (a) avoid changes in the intensity or type of agricultural land use to land use activities and/or management practices that result in an increase, in gross greenhouse gas emissions from agriculture at the region [or whaitua] scale, and (b) enable land use change in the region to lower emissions rural land uses or land use practices.</p> <p>OR, in lieu of adding (b), add a new policy Regional plans shall include objectives, policies, rules and/or methods that recognise the benefits of, and enable rural land use change that contributes to reducing gross greenhouse gas emissions from agriculture.</p>
S128.023	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Supports nature-based solutions where possible, however it acknowledges that other interventions will likely also be required. Supports this policy (of providing for nature-based solutions) but suggests a minor amendment to reflect our interpretation of the policy so this is clear.	Add a sentence to the Explanation paragraph. This policy does not preclude the use of other solutions, where necessary or appropriate.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S128.024	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Support a focus on support a focus on emissions reductions as the priority over offset.	Retain as notified.
S128.025	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	<p>The policy in essence restates the requirements of the NPSFM 2020, however risks not capturing the full context.</p> <p>The amendment to (b) is sought to recognise that the NPSFM 2020 provides for the long-term visions for freshwater to be intergenerational. The changes to the NRP may only be one step along that journey in some cases (e.g. there can be interim target attribute states).</p> <p>Target attribute states and environmental flows and levels must be set in a way that will achieve the long-term vision.</p> <p>Limit setting must have regard to the long-term vision.</p>	<p>Amend Policy 12, to refer more generally to the regional plan implementing the requirements of the NPSFM 2020,</p> <p>OR</p> <p>Amend subclause (b) Achieve, or contribute to achieving, the long-term visions for freshwater;</p>
S128.026	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	It is noted that the RPS does not include definitions for earthworks or vegetation disturbance - this would assist in providing clarity to the policy.	Retain as notified however consider providing definitions for earthworks or vegetation disturbance.
S128.027	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	<p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p> <p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p>	Amend as follows: Regional plans shall in managing take and use of water and discharges to freshwater include policies, rules and/or methods that prioritises the health and wellbeing of the waterbody and freshwater ecosystems first, and then prioritises any take and use of water for the health needs of people.

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S128.028	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	<p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p> <p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p>	<p>Amend as follows: The health needs of people include:</p> <p>(a) the taking of water by any statutory authority that has a duty for public water supply under any Act of Parliament for drinking water or other essential health need; (b) the taking of water for reticulation into a public water supply network for drinking water or other essential health need; (c) the taking of water for community drinking water supplies; and</p>
S128.029	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	<p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p> <p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p>	New subclause to be added. (e) food production that contributes to domestic food supply.
S128.030	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Many clauses reflect the NPSFM 2020 direction - e.g. clauses (a), (f), (g), (h). Where the references differ, or are framed differently, this may create interpretation issues.</p> <p>While clause (c) reflects Policy of the NPSFM (in respect of natural inland wetlands), how does this interface with the exclusions/exemptions provided for under the NPSFM? It is also noted that whether the NPSFM was intended to, or will apply to coastal wetlands is still subject to change.</p>	<p>Amend as follows:</p> <p>(c) as required to give effect to the NPSFM 2020, there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</p> <p>(d) as required to give effect to the NPSFM 2020, achieving environmental outcomes, target attribute states and environmental flows and levels;</p> <p>(e) as required to give effect to the NPSFM 2020, avoiding the loss of river extent and values;</p> <p>(f) as required to give effect to the NPSFM 2020, protecting the significant values of outstanding water bodies;</p> <p>(g) as required to give effect to the NPSFM 2020, protecting the habitats of indigenous freshwater species are protected;</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					(h) as required to give effect to the NPSFM 2020 , Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;
S128.031	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	There is a grammatical error in clause (g), where protecting and protected are duplicated.	Amend as follows: (g) protecting the habitats of indigenous freshwater species are protected ;
S128.032	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Clause (e) more stringent that Policy 7 NPSFM of the RMA which reads" The loss of river extent and values is avoided to the extent practicable." The proposed change is missing 'to the extent practicable' - it is unclear why/whether this is intentional.	Amend as follows: (e) avoiding the loss of river extent and values to the extent practicable ;
S128.033	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Support promoting storage in (l), however seek this applies to water storage broadly.	Amend as follows: (l) Promoting the installation of off-line water storage.
S128.034	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support in part	This provision refers to 'registered water suppliers and users' in the body of the policy, but 'municipal water supplies' in the explanation. The use of the term 'registered water suppliers' means that the scope of the policy is potentially very broad - light of recent changes to the drinking water statutory framework e.g., Water Services Act, which has changed who is a 'drinking water supplier' - however the policy appears to be most relevant to Council supplies.	Amend as follows: Regional plans shall include policies, rules and/or methods to reduce demand of water from registered municipal water suppliers and users, including:
S128.035	Chapter 4.1:	Policy FW.2: Reducing water	Support in part	This provision refers to 'registered water suppliers and users' in the body of the policy, but 'municipal water supplies' in the explanation. The use of the term 'registered water suppliers'	Amend as follows: District plans shall include policies, rules and/or methods to reduce demand of water from registered municipal

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regulatory policies	demand - district plans		means that the scope of the policy is potentially very broad - light of recent changes to the drinking water statutory framework e.g., Water Services Act, which has changed who is a 'drinking water supplier' - however the policy appears to be most relevant to Council supplies.	water suppliers and users, including where practicable:
S128.036	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Support using a risk-based approach, this is valid both in determining natural hazard risk and in the management response - for example, a non-habitable farm buildings for example are less of a risk compared to new residential development. The direction of avoiding all subdivision, use or development in areas where hazards and risks are assessed as high too extreme may be too onerous in all circumstances.	Amend as follows:(d) include objectives, policies and rules to avoid subdivision, or inappropriate use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.
S128.037	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	Support a more consistent and efficient approach to resource management that includes partnership with mana whenua / tangata whenua. HortNZ's support this being focused on the plan-making level and governance, so that values inform the plan approach. In respect to consent applications, this clause needs to be appropriate to the size/scale/significance of the consent.	Consider providing further clarification in respect to partnering with mana whenua / tangata whenua at the consenting level.
S128.038	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	As previously noted need to be clear on the definition of 'agricultural greenhouse gas emissions' so that it is clear what will be assessed. This policy does not address the scale at which the assessment occurs; Seeks this is at the region (or if appropriate, whaitua scale). This is important to retain land flexibility while also driving towards lower emissions.	Amend as follows:When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to: (a) reducing gross agricultural greenhouse gas emissions as a priority where practicable, and (b) where it is not practicable to reduce gross agricultural greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and (c) avoiding any increase in gross agricultural greenhouse gas emissions at the region [or whaitua] scale .
S128.039	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse	Support in part	HortNZ also seek a more 'enabling' approach. Climate Change Commission analysis in Ināia tonu nei: a low emissions future for Aotearoa shows that even without new technologies, Aotearoa can reduce agricultural emissions through efficiencies on farms, and by switching some pastoral land to forestry and horticulture. Land use change to horticulture	Add new subclause:(d) providing for land use change to horticulture .

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		gas emissions - consideration		should therefore been provided for. This is important for meeting national direction around highly productive land and also emissions reduction. The policy and/or explanation could add further context to what tools will be used to support assessment.	
S128.040	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	The policy should have a limited applicability, from when the RMA enables such considerations (noting that this date will have passed once the RPS changes becomes operative) and only until such time as the regional plan specifically addresses greenhouse gas emissions, as the RPS directs.	Add new sentence in the Explanation section This policy does not take effect until November 2022 and will cease to apply once Policy CC.5 has been implemented through the regional plan.
S128.041	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	The considerations are generally consistent with the NPSFM direction.	Retain as notified
S128.042	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	Question whether this policy is necessary, because: <ul style="list-style-type: none"> • Environmental outcomes and target attribute states in (a) are not yet set, presumable also suspended sediment limits under NPSFM • Earthworks is currently managed by regional and district plans, and there is direction elsewhere (in the RPS changes) directing the management in these plans - when they come through apply to consenting. 	Delete Policy 41.
S128.043	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o	Support in part	Subclauses (c) and (e) are too specific given NPSFM process for whitua which set the environmental flows and levels, and take limits through the NPSFM 2020 process. In addition: <ul style="list-style-type: none"> • Take limits need to be set to meet environmental flows and levels, so there is not a need to include both; 	Replace subclauses (c) and (d) with new clause: (c) Where take limits have been set, take limits are achieved; (e) Environmental flows and levels, including variability of flows, are achieved; (d) Take limits are achieved that provide for flow or level variability, safeguard

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		te Wai - consideration		<ul style="list-style-type: none"> Take limits will be set to provide for freshwater values, therefore it is not necessary to state the additional text. 	ecosystem health, provide for the life cycle needs of aquatic life, and take into account environmental outcomes;
S128.044	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	This policy should not just be limited to urban development.	Amend Policy FW.5 as follows:Water supply planning for climate change and urban development - consideration
S128.045	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Support regard being given to climate change impacts and development of water storage.	Amend as follows:(c) development of future water sources, storage, treatment and reticulation, including water storage schemes; and
S128.046	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Terms and language should be consistent throughout the RPS Change 1 document.	Amend as follows:g) avoiding inappropriate subdivision, inappropriate use or development, and hazard sensitive activities where the hazards and risks are assessed as high to extreme
S128.047	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Highly productive land is a natural resource that will need to be carefully managed with a changing climate so this land can continue to meet the reasonably foreseeable needs of future generations. With a changing climate we can expect the following impacts. Natural hazards pose a risk to food production and events can disrupt food supply - there may be situation where structural protection works or hard engineering methods are warranted.	Amend as follows: (c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, highly productive land with food security values , regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best

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					practicable option for the future;
S128.048	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	New urban development beyond the region's urban areas should consider highly productive land, which is recognised elsewhere in the (operative) RPS.	New subclause to be added under Policy 55(a)(ii) 9. Protecting highly productive land from inappropriate subdivision, use and development.
S128.049	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	<p>Support retaining the considerations in (a), however the policy could be more specific as to the type of development is trying to capture. The explanation to the policy previously stated that it relates to urban development and rural residential development, this clarity has been removed.</p> <p>Interest in ensuring that primary production activities are appropriately provided for (and enabled) in the rural environment; this is important for meeting national direction around highly productive land and also emissions reduction.</p> <p>The policy intent in the Section 32 evaluation report indicates the focus of this policy is on urban development.</p>	<p>Provide clarity as to what this policy applies to by adding a sentence to the main body: This policy applies to urban development and rural residential development.</p> <p>OR</p> <p>Retain the main body and add a new subclause: (x) The use of highly productive land for food production is enabled.</p>
S128.050	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Support improving rural resilience to climate change, including in promoting and supporting land uses that will reduce gross greenhouse gas emissions	Retain as notified.
S128.051	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Support development of strategic climate change adaptation plans, seek some amendments to provide for water storage.	Add a subclause: (h) options for water storage to promote resilience for rural and urban communities.

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S128.052	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Support promotion and support of options for water attenuation and retention, such as groundwater recharge and water storage at varying scales. These will be important for climate change resilience.	Retain as notified
S128.053	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support in part	Land use change is an option for reducing emissions.	Amend subclause (c): (c) supporting primary sector groups and landowners in researching and promoting climate resilient or lower emissions land uses and pathways to move to new land uses.
S128.054	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support in part	Policy 67 previously includes (g) safeguarding the productive capability of the rural area. A mention of highly productive land is valid in terms of establishing urban environments.	Add a new subclause: (g) recognising the values of highly productive land, including long-term for food production
S128.055	Chapter 4.5: Methods to implement policies (regulatory methods)	Method FW.1: Freshwater Action Plans	Support in part	Support the development of Freshwater Action Plans as part of the NPSFM 2020 approach, this should also involve communities.	Amend as follows: Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua, and with communities as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP,...
S128.056	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners	Support	Consider highly productive land to be of significant value. The NPSHPL 2022 will require a mapping exercise.	Add new subclause: (f) identify areas of highly productive land

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		and the community in the identification and protection of significant values			
S128.057	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support in part	Support the development of a regional water supply strategy, this could cover both urban and rural communities, a minor amendment is sought clarify that.	Amend as follows:(d) secure sustainable water supplies for urban and rural communities across the region, preparing for climate change;
S128.058	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	Agree it is appropriate to review the approach to reducing agricultural greenhouse gas emissions, to align with national direction as there has been significant work undertaken through partnerships such as He Waka Eke Noa.	Retain as notified.
S128.059	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 48: Water allocation policy review	Support in part	A minor amendment to (i) is sought to align with overall climate direction.	Amend as follows:(i) land use change to lower emissions or more climate resilient uses is promoted
S128.060	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 48: Water allocation policy review	Support in part	Coherence is lacking in subclauses (c), (d), (g) and (h): in how they link to the "Review water allocation policy in the regional plan so that:" statement.	correct grammatical errors in (c), (d), (g) and (h)

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S128.061	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Support the general intent, land use change to horticulture is also an option for reducing emissions - amendment is sought to (c) to reflect this.	Amend as follows:(c) promoting and supporting actions to reduce agricultural gross greenhouse gas emissions and/or increase climate resilience, including options for land use change to horticulture
S128.062	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Regional form, design and function Anticipated environmental results	Support in part	As elsewhere, urban development needs to be carefully planned to protective the values of highly productive land.	Amend paragraph 5 in Table 14 (p. 204) 5. Urban expansion is carefully planned including occurring in locations and ways that are well connected, support the protection of freshwater ecosystems, retain highly productive land and improve resilience to the effects of climate change
S128.063	Appendix 3: Definitions	General comments - definitions	Support in part	Amend the existing RPS definition, to be more consistent with the NPS for Highly Productive Land 2022, and the WRGF, to capture Land use classes 1-3.	Amend as follows:Highly protective agricultural land is Class I and , II and III land in the land use capability classes of the New Zealand Land Resources Inventory. Also trigger consequential amendment to Policy 59
S128.064	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	To provide clarity to the policy direction relating to agricultural greenhouse gas emissions.	Insert new definition as follows: Agricultural Green House Gas Emissions - Agricultural Green House Gas Emissions means methane from ruminant animals, and nitrous oxide from animal waste and nitrogen in fertiliser.
S128.065	Appendix 3: Definitions	Hazard sensitive activity	Support in part	It is not clear what scale of activity might be invertedly captured by 'hazardous facilities', whereas major hazardous facilities is a term defined through regulations e.g. Health and Safety at Work (Major Hazard Facilities) Regulations 2016.	Amend as follows:Means any building that..... <ul style="list-style-type: none"> hazardous facilities and major hazardous facilities

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S115 Hutt City Council					
S115.003	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	General comments - Chapter 3	Oppose	<p>The purpose of including overarching issues is presumably to provide a more integrated approach across the range of regional resource management issues in the RPS and subordinate planning documents. As such, it is important that all relevant issues are visible in this overarching section. As proposed, they are not.</p> <p>In general, the Regional Policy Statement is already lengthy and including both issues and objectives does not add significantly to the plan's usability. Accordingly, the Council seeks the deletion of overarching issues.</p> <p>These are detailed further in our submission.</p>	<p>Omit the issue statements.</p> <p>Alternatively, if the overarching issues are retained, the following amendments are sought:</p> <ul style="list-style-type: none"> • Reframe the issue statements as general environmental issues, rather than as critiques of current practice. • Ensure issues relating to the needs of the urban environment are included (not just the impacts of the urban environment on the natural environment)
S115.004	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Oppose	<p>We note that GWRC has addressed concerns raised in the draft by adding an additional issue around the urban environment. However, it still considers only the pressures that the urban environment places on the natural environment, rather than the social and economic needs for a well-functioning urban environment.</p>	<p>Delete the issue statement (along with other issues), or if issue statements are retained amend Issue 2 as follows:</p> <p>"Population growth is putting pressure on housing and infrastructure capacity. To meet the needs of current and future populations, development will place additional pressure on the natural and built environments. At the same time, there is a need to increase housing supply across the region and ensure that future communities have good access to key services and employment opportunities. Planning decisions will need to consider a range of factors that contribute to a well- functioning urban environment and how the natural and built environment can work together to achieve this."</p>
S115.005	Chapter 3: Resource management issues, objectives and summary	Overarching Objective A	Support in part	<p>To aid in navigating the RPS, the objective should not be located within a chapter introduction, but stand alone.</p>	<p>Relocate proposed Objective A out of the chapter introduction and treat consistently with how other objectives in the RPS are presented.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	of policies and methods to achieve the objectives in the Regional Policy Statement				
S115.006	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The wording of the introduction "seven of the past nine years" will soon be out of date.	Amend the start of the introduction: "As of 2022, long term weather records..." Or otherwise reword so that it will continue to make sense when read in future years.
S115.007	Chapter 3.1A: Climate change	Objective CC.2	Oppose	While the intent of this objective is supported, there is limited ability to advance this goal through the resource management system. The policies and methods (other than Policy IM.2, which we comment on below) have limited relevance to this objective compared to other proposed objectives on climate change.	Delete the objective.
S115.008	Chapter 3.1A: Climate change	Objective CC.3	Support in part	The general intent of the objective is supported. However, we question whether the proposed policies and methods (or any possible policies and methods of an RPS) can take primary responsibility for achieving this goal. In addition, clause (a)(ii) refers to a percentage change in mode share. Mode share is already a percentage - the objective should clarify whether this goal is 40 percent of the relevant current mode share figure, or 40 percentage points.	Amend Objective CC.3 to clarify the intent of clause (a)(ii) add to the following note: "Note: while policies and methods of this RPS contribute to achieving this objective, it is primarily achieved outside the resource management system, including through the New Zealand Emissions Trading Scheme"
S115.009	Chapter 3.1A: Climate change	Objective CC.4	Support	No reasons given	Retain as notified
S115.010	Chapter 3.1A: Climate change	Objective CC.5	Support in part	Support intent. This objective can primarily be achieved only through the methods available to the regional council under s30 of the RMA, and through methods outside the resource management system.	Amend Objective CC.5 and associated methods to make clear that they only apply to regional councils. (See also relief sought for Method CC.4).
S115.011	Chapter 3.1A: Climate change	Objective CC.6	Support	No reasons given	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S115.012	Chapter 3.1A: Climate change	Objective CC.7	Oppose	While the intent of this objective is supported, it can only be achieved through non-RMA methods, and therefore does not belong in the RPS.	Delete Objective CC.7
S115.013	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	We support the objective, but it simply restates the objectives and principles from section 1.3 of the National Policy statement for Freshwater Management 2020 (NPS-FW). We consider that provisions of higher order national direction should not be duplicated in the RPS. Rather, appropriate objectives drafted for the regional context that give effect to national direction.	Amend Objective 12 to give effect to the NPS-FW in the regional context, rather than repeating the higher order direction.
S115.014	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems. We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S115.015	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems introductory text	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems. We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S115.016	Chapter 3.6: Indigenous ecosystems	Objective 16	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems. We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S115.017	Chapter 3.6: Indigenous ecosystems	Objective 16B	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	
S115.018	Chapter 3.6: Indigenous ecosystems	Objective 16C	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S115.019	Chapter 3.6: Indigenous ecosystems	Objective 16A	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S115.020	Chapter 3.8: Natural hazards	Natural hazards introductory text	Support	No reasons provided	Retain as notified
S115.021	Chapter 3.8: Natural hazards	Objective 19	Support	No reasons provided	Retain as notified
S115.022	Chapter 3.8: Natural hazards	Objective 20	Support	No reasons provided	Retain as notified
S115.023	Chapter 3.8: Natural hazards	Objective 21	Support	No reasons provided	Retain as notified
S115.024	Chapter 3.9: Regional form,	Regional form, design and function	Oppose	This introduction is very long and does not add to understanding the objectives and policies relating to regional form, design, and function.	Reduce the length of the introduction and ensure it provides sufficient guidance for RPS users about the objectives and policies relating to regional form, design and function.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	design and function	introductory text			
S115.025	Chapter 3.9: Regional form, design and function	Objective 22	Support	No reasons provided	Retain as notified
S115.026	Chapter 3.9: Regional form, design and function	Objective 22B	Oppose	This objective is unclear, particularly in relation to what it means to be "strategically planned". As the objective primarily supports non-regulatory methods and consideration policies, the objective seems unnecessary.	Delete new Objective 22B
S115.027	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>District plans have limited ability to regulate how transport infrastructure is operated. District plans regulate land use and cannot generally affect how road and rail infrastructure is allocated between modes or used.</p> <p>In general, the major decisions around how transport infrastructure is designed and constructed to reduce greenhouse gas emissions are locked in when a project's broad outlines are set, and the choice is made to fund the project. By the time a project is at detailed consenting stage, it is too late to make major changes (such as route or mode). Therefore, we see more of the detailed design choices as being best achieved outside the resource management system, through:</p> <ul style="list-style-type: none"> • Decisions on infrastructure investment made in the Regional Land Transport Plan (see amendments proposed to Policy 9 and new Policy EIW.1, and Action 10.1.4 in the Ministry for the Environment's Emissions Reduction Plan) • Mode choice decisions made by individuals in response to the incentives provided for by the NZ Emissions Trading Scheme, regional council decisions on public transport fares, etc. <p>This policy retains its importance chiefly through the ability to, and the threat of, inappropriate projects having their consents declined. We therefore suggest amendments to strengthen the policy that it can realistically be used to decline inappropriate projects.</p> <p>That said, we still support the policy's direction to control the</p>	Substitute new Policy CC.1 completely with: Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans District and regional plans shall include objectives, policies, and methods that only enable new transport infrastructure or significant alterations to transport infrastructure where it: (a) does not provide added transport network capacity for high-carbon passenger transport modes; and (b) to the extent possible for a project of its scale, maximises local and regional mode shift from high-carbon passenger transport modes to low and zero-carbon modes; and (c) is designed and constructed to minimise greenhouse gas emissions; and (d) can be and is intended to be operated to minimise greenhouse gas emissions

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				design and construction of transport infrastructure to the extent this is possible at the stage it is controlled by the resource management system.	
S115.028	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>Travel demand management plans are only one tool for achieving travel demand management and driving mode shift. For small developments, developments without parking, or developments in zones already identified as well-located suitable for denser development, they are generally impractical or disproportionately burdensome.</p> <p>We request the policy be deleted, and district plans and resource consent decisions decide what situations would require travel demand management plans as well as the threshold of scale to be applied.</p>	Delete new Policy CC.2
S115.029	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	Support, but a definition for "zero and low-carbon multi-modal transport" needs to be provided.	<ul style="list-style-type: none"> Retain Policy CC.3 Include a definition for 'zero and low- carbon multi-modal transport'.
S115.030	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	This policy is not sufficiently clear for policy statement users to understand what is required.	Delete Policy CC.4.
S115.031	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose in part	The definition of "nature-based solutions" is not sufficiently clear for policy statement users to understand what is required. It is also unlikely that a district or regional plan would fail to provide for nature- based solutions to be part of development and infrastructure planning and design in the absence of this direction.	Delete Policy CC.7

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S115.032	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support	No reasons provided	Retain as notified
S115.033	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	No reasons provided	Retain as notified
S115.034	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Support as proposed, note our comments on proposed new Policy CC.1 that the Regional Land Transport Plan is a useful tool to achieve the relevant objectives.	Retain as notified.
S115.035	Chapter 4.1: Regulatory policies	Policy 10: Promoting travel demand management - district plans and the Regional Land	Support	Support the deletion of this policy	Delete Policy 10 as proposed

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		Transport Strategy			
S115.036	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Support as proposed, note our comments on proposed new Policy CC.1 that the Regional Land Transport Plan is a useful tool to achieve the relevant objectives.	Retain as notified
S115.037	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	The policy simply restates the direction of the National Policy Statement for Freshwater. We suggest redrafting the policy to apply it in the regional context.	Redraft Policy to apply higher order direction in the regional context.
S115.038	Chapter 4.1: Regulatory policies	Policy 13: Allocating water - regional plans	Support	Support deletion as proposed	Delete Policy 13 as proposed
S115.039	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	This policy duplicates other policies in the RPS. (e.g. Policy 15 (i))	Redraft Policy 14 to remove duplication
S115.040	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and	Support	No reasons given	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		regional plans			
S115.041	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support	No reasons given	Retain as notified
S115.042	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	No reasons given	Retain as notified
S115.043	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Not Stated / Neutral	Neutral on substance of policy but note an error in Table 4: Policy FW.1 is listed as being implemented by Method 1 which applies to city and district councils, but it should be Method 2. This appears to have been swapped with Policy FW.2.	Amend Table 4 as it relates to Policy FW.1 to be implemented by Method 2.
S115.044	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Oppose	<p>While the intent of the policy is supported, there is no way to implement this policy with provisions in a district plan that can adequately be monitored or enforced.</p> <p>Although this provision does allow for consent conditions on subdivisions, the outcomes will also fall within the provisions of:</p> <ul style="list-style-type: none"> • Wellington Water Limited or its successors as a water provider • The regional council as a water take and use consenting authority <p>In addition, if the policy is retained, there is an error in Table 4 (see our comments on Policy FW.1)</p>	<p>Delete policy, or</p> <p>Amend as follows:</p> <p>"Policy FW.2: Reducing water demand - district plans</p> <p>District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable:</p> <p>(a) provisions improving the efficiency of the end use of water on a per capita basis for new developments; and</p> <p>(b) provisions requiring alternate water supplies for non-potable use in new developments.</p> <p>..."</p> <p>And correct Table 4 to refer to Method 1 rather than Method 2.</p>

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S115.045	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	This is long, complex and prescriptive. Some of the points relate to requirements already set out in the RMA. Redrafting of this policy is required to make it more succinct.	Retain Policy FW.3, but amend to reduce the length and complexity of the policy by removing clauses that duplicate higher order direction.
S115.046	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>The question of how to fund stormwater management measures is a solely a decision for territorial authorities and their communities under the Local Government Act. There are a number of different tools territorial authorities can use, one of which is financial contributions. Councils also have other funding options, such as using general revenues, targeted rates, or central government funding assistance. These decisions are best made by territorial authorities based on their local context, rather than being directed through the Regional Policy Statement.</p> <p>There are also a number of issues with this policy as drafted, including the lack of a definition for "fair share", the application to financial contributions levied for permitted activities, and the inaccurate note.</p>	Delete Policy FW.4
S115.047	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	We seek the deletion of all the proposed provisions relating to indigenous biodiversity until the upcoming National Policy Statement on Indigenous Biodiversity is gazetted.	Delete amendments to Policy 23 and retain the Operative RPS Policy 23. Failing that, amend the deadline from 30 June 2025 to 5 years after RPS Change 1 becomes operative.
S115.048	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant	Oppose	If the provisions are nonetheless added, then HCC seeks an amendment to the deadline date from 30 June 2025 to 5 years from the operative date of the proposed RPS change 1. This is because the deadline does not align with the deadline proposed in the most recent draft of the National Policy Statement on Indigenous Biodiversity (5 years from the commencement date of that NPS).	Delete amendments to Policy 24 and retain the Operative RPS Policy 24. Failing that, amend the deadline from 30 June 2025 to 5 years after RPS Change 1 becomes operative.

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		indigenous biodiversity values - district and regional plans			
S115.049	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Oppose	If the provisions are nonetheless added, then HCC seeks an amendment to the deadline date from 30 June 2025 to 5 years from the operative date of the proposed RPS change 1. This is because the deadline does not align with the deadline proposed in the most recent draft of the National Policy Statement on Indigenous Biodiversity (5 years from the commencement date of that NPS).	Delete new Policy IE.1.
S115.050	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Support the intent of this policy. As some hazards recur with a frequency of less than 1 in 100 years (such as fault ruptures) it should be clarified that it does not preclude consideration of hazards beyond this time period.	Retain the amendments to Policy 29, but with the following change to clause (b): "use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over at least a 100 year planning horizon;"
S115.051	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support in part	<p>We support removing references that could be construed as references to national planning standards zones. the current policy in the operative RPS also uses terms in a way that are inconsistent with the national planning standards.</p> <p>However, we do not support the concept of "locally significant centres". If centres are not of regional significance, then they should not be addressed by the Regional Policy Statement.</p> <p>The amendments also continue the unnecessary distinction of "sub-regional" and "suburban" centres in the operative RPS. While this distinction is made in the list of centres, the policy direction does not reflect this difference and does not</p>	<p>Amend Policy 30 as follows: "Policy 30: Maintaining and enhancing the viability and vibrancy of regionally significant centres - district plans District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of:</p> <ol style="list-style-type: none"> 1. The regionally significant central business district main centre of the region, the central business area of Wellington City; 2. Other regionally significant centres:(i) Lower Hutt;(ii) Petone;

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>accurately reflect differences in the size, scale, and role of centres.</p> <p>We request that all centres other than the Wellington City Centre be listed as "other regionally significant centres". District plans can then set out the hierarchy and role of centres a district. We support both the Lower Hutt city centre and the Petone commercial area continuing to be identified as having regional significance.</p>	<p>[(iii) and other centres outside the City of Lower Hutt as appropriate]</p> <p>3. the locally significant centres of: [list of centres]</p> <p>Explanation</p> <p>Policy 30 identifies the hierarchy of regionally and locally significant centres within the Wellington Region for which district plans must maintain and enhance their vibrancy and vitality. The centres identified are of significance to the region's form for economic development, transport movement, civic or community investment. Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. It is also important for their prosperity and resilience in the face of social and economic change. The regional-central business district area of Wellington City is the major centre the main centre in the Wellington region; the other key centres also provide significant business, retailing commercial and community services. This policy does not limit territorial authorities from identifying additional centres of local or sub-regional significance within the district plan."</p> <p>(Our submission is neutral on which centres outside the Hutt City Council area are included, other than the Wellington City centre)</p>
S115.052	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	The operative policy is redundant, and we support it being removed. However, the replacement policy simply repeats the direction of the National Policy Statement on Urban Development, without providing any additional direction or regional context.	Delete Policy 31 as proposed. Delete proposed replacement Policy 31.

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S115.053	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	No reasons given	Retain as notified
S115.054	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	Support as proposed	Retain as notified
S115.055	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support in part	While we support the general intent of this policy it is unclear which situations the policy is intended to apply to. At minimum the policy should set out whether it applies only to Māori freehold land, or whether any general land in Maori ownership is included, and which mana whenua groups should be covered.	Amend Policy UD.1 to clarify which situations the policy applies to.
S115.056	Chapter 4.2:	Policy IM.1: Integrated	Support in part	While we support the general intent of the policy, these are high level considerations and do not specify the situations	Amend Policy IM.1 as follows: "Policy IM.1: Integrated management - ki uta ki tai - consideration

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Matters to be considered	management - ki uta ki tai - consideration		<p>where particular action should be taken. This is inevitable given the scale of a Regional Policy Statement and the wide range of situations it must cover.</p> <p>Other than clause (e), which we comment on below, we support the policy in its application to notices of requirement and district plans. District plans are the appropriate place to set policies and rules that provide thresholds for different matters to be considered in resource consents.</p> <p>In relation to clause (e), which covers Māori data sovereignty, while we appreciate the importance of this issue it was not included in the draft proposal on which officers provided feedback. We are not equipped in the time available to make meaningful input on how policy relating to Māori data could work.</p> <p>Hutt City Council is currently doing internal work on a data ethics policy, but it is too soon to include this in a regulatory method in the RPS. Council seeks further engagement with the regional council, tangata whenua/mana whenua, and the community on this matter.</p> <p>Accordingly we oppose clause (e) and seek its deletion, and this matter be pursued through a separate RPS change at a later date if found necessary after meaningful engagement.</p>	<p>When considering an application for a resource consent, a notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be given to:</p> <p>(a) partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua involvement in resource management and decision making; and</p> <p>(b) recognising the interconnectedness between air, freshwater, land, coastal marine areas, ecosystems and all living things - ki uta ki tai; and</p> <p>(c) recognising the interrelationship between natural resources and the built environments; and</p> <p>(d) making decisions based on the best available information, improvements in technology and science, and mātauranga Māori; and (e) upholding Māori data sovereignty; and</p> <p>(f) requiring Māori data and mātauranga Māori to be interpreted within Te Ao Māori; and</p> <p>(g) recognising that the impacts of activities may extend beyond immediate and directly adjacent area, and beyond organisational or administrative boundaries</p> <p>Explanation This policy requires that a holistic, integrated view is taken when making resource management decisions. It also requires both regional and district councils to provide for mana whenua / tangata whenua are actively involved in in resource management and decision making, including the protection of mātauranga Māori and Māori data."</p>
S115.057	Chapter 4.2: Matters to	Policy IM.2: Equity and inclusiveness -	Oppose	While we appreciate the intent of the policy, the matters it addresses are generally not resource management considerations for city and district councils as they cannot be addressed through controlling land use or subdivision. The	<ul style="list-style-type: none"> • Delete Policy IM.2, or failing that, • Amend the policy so that it does not apply to resource consents, or failing that, • Amend the policy to set situations and thresholds for which this

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	be considered	consideration		<p>policy is also not supported by any higher order document or provision in the RMA.</p> <p>If the policy is included, it is also insufficiently clear for assessing resource consents about what situations it applies to, the threshold of significance, and what matters should be considered.</p>	assessment should apply.
S115.058	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	While we support the intent of the policy, this assessment is not feasible in relation to individual resource consent applications.	<ul style="list-style-type: none"> Remove the requirement to undertake this assessment for individual resource consent applications. Include a definition of 'optimise' within RPS Change 1.
S115.059	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	While we support direction on this issue to inform zoning decisions for the appropriate location for freight distribution facilities and industrial areas, this assessment is not feasible in relation to individual resource consent applications.	Remove the requirement to undertake this assessment for individual resource consent applications.
S115.060	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose	This assessment is better conducted as part of funding and design decisions made by transport infrastructure providers. By the time a consent application is made, there is little meaningful action possible to affect whole of life emissions other than to decline a proposal. These assessments should be undertaken in the earlier stages of a proposal, before reaching the RMA stage.	Delete Policy CC.11
S115.061	Chapter 4.2: Matters to	Policy CC.12: Protect, enhance	Oppose	The definitions of relevant terms including "nature- based solution", "climate change adaptation", and "climate change mitigation" are not clear enough to implement this policy. In	Delete new Policy CC.12

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	be considered	and restore ecosystems that provide nature-based solutions to climate change - consideration		addition, it does not adequately set situations or thresholds where this assessment should occur.	
S115.062	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	We are neutral towards the overall intent of the policy but request the policy is amended to make clear that it applies to regional consents (which are the only relevant consents to the policy).	Retain Policy CC.13, but amend as follows: "When considering an application for a regional resource consent, ..."
S115.063	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	The principles for water sensitive urban design (clause (b)) and rainwater retention (clause (c)) duplicate the freshwater-specific policies and should be deleted. The remaining matters cannot be achieved through the regulatory means available to territorial authorities. As such, if this policy is retained, we seek an amendment to clarify that the policy applies to regional plans only.	<ul style="list-style-type: none"> Delete new Policy CC.14, or Amend the policy to remove clauses (b) and (c) and clarify that the policy only applies to regional plans.
S115.064	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	Support but note that resource consent decisions have little practical ability to determine whether infrastructure contributes to reducing greenhouse gas emissions, and the resource management system as a whole is not well suited to influencing decisions about alternative projects. See our comments on Policy CC.11.	Amend Policy 39 to clarify that the policy does not require renewable energy projects and regionally significant infrastructure projects to conduct a greenhouse gas assessment at resource consent stage, unless the applicant is relying on the beneficial environmental effects of greenhouse gas emissions reductions to justify the project.
S115.065	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health	Not Stated / Neutral	No position on the substance of this policy but note a mistake in Table 4: the cross-reference to Method 4 (implemented by city and district councils) should be Method 2 (Regional plan implementation).	Amend Table 4: Under Policy 40, remove reference to Method 4 and replace with Method 2.

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		and well-being of water bodies and freshwater ecosystems - consideration			
S115.066	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	No reasons given	Retain as notified
S115.067	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	No reasons given	Retain as notified
S115.068	Chapter 4.2: Matters to be considered	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Support the deletion of this policy	Delete POLicy 43 as proposed
S115.069	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o	Support	No reasons given	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		te Wai - consideration			
S115.070	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	No reasons given	Retain as notified
S115.071	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S115.072	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S115.073	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Support the intent of this policy. However, we expect district plans will adequately provide for the situations where natural hazards should be considered and this does not need to be revisited in individual resource consents where the district plan has already assessed the level of risk.	Retain amended Policy 51 but modified so that it does not apply to resource consents once the relevant district or regional plan has given effect to Policy 51.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S115.074	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Support the intent of this policy, but: <ul style="list-style-type: none"> • A suitably specific definition is needed for "room for the river" • The reference to innovation is redundant. Innovation is not a goal in and of itself, and whether a solution is innovative is independent of whether it is effective. 	Retain amended Policy 52 but: <ul style="list-style-type: none"> • provide a definition for "room for the river", and • amend clause (b) as follows: "(b) whether non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options provide a more appropriate or suitably innovative solution;"
S115.075	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	No reasons given	Retain as notified
S115.076	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Support in relation to changes, variations, and reviews of district plans. However, for territorial authority land use and subdivision consents, this level of assessment is likely to be redundant given the more detailed objectives, policies, and assessment criteria that would be included in rural zone and subdivision chapters.	Amend Policy 56 insofar as it applies to resource consents, so that it only applies to regional resource consents.
S115.077	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support in part	While we support direction on this issue to inform decisions on district plans, this type of analysis should be complete at plan-making stage and it is redundant and infeasible to reconsider the issue from scratch for each resource consent.	Amend Policy 57 so that it does not apply to resource consents.
S115.078	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	While we support direction on this issue to inform decisions on district plans, this type of analysis should be complete at plan-making stage and it is redundant and infeasible to reconsider the issue from scratch for each resource consent. There may be resource consents for developments not anticipated in their zone for which this type of assessment will be relevant. However, district plans that themselves implement this policy will have sufficient direction without needing to go up to the Regional Policy Statement as well.	Amend Policy 58 so that it does not apply to resource consents.
S115.079	Chapter 4.2: Matters to	Policy UD.2: Enable Māori	Support in part	While we support direction on this issue to inform decisions on district plans, this type of analysis should be complete at plan-making stage and it is redundant and infeasible to reconsider	Amend Policy UD.2 so that it does not apply to resource consents.

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	be considered	cultural and traditional norms - consideration		the issue from scratch for each resource consent. District plans that implement this policy will have adequate triggers for when more detailed assessment is required.	
S115.080	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>We support this direction to meet the requirements of clause 3.8(3) of the NPS-UD. However, the criteria could be improved and made more consistent with the goals of the NPS-UD:</p> <ul style="list-style-type: none"> • To better provide for non-residential development, • To recognise there may be limitations in monitoring and this should not preclude applicants from providing the assessment instead, • To avoid unnecessary assessment which is not necessary to determine if a proposal provides for significant development capacity, • To provide a standard for infrastructure provision that recognises that infrastructure capacity cannot always cleanly be assigned and limited to specific areas, and • To improve clarity 	<p>Amend Policy UD.3 as follows: "Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:</p> <p>(a) the location, design and layout of the proposal:</p> <p>(i) contributes to establishing or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22,</p> <p>(ii) is well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors</p> <p>(iii) where it provides for housing the proposal will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development,</p> <p>(b) the proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage otherwise identified in monitoring for:</p> <p>(i) a variety of housing that meets the a regional, district, or local shortages of housing in relation to the a particular type, size, or format, or (ii) business space or land of a particular size or locational type, or</p> <p>(iii) community, cultural, health, or educational facilities, and or</p> <p>(iv) the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and</p>

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					<p>(c) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution:</p> <p>(i) is of high yield relative to either the forecast demand or the identified shortfall,</p> <p>(ii) will be realised in a timely (i.e., rapid) manner, and</p> <p>(iii) is likely to be taken up, and (iv) will facilitate a net increase in district wide up-take in the short to medium term,</p> <p>(d) required development infrastructure can be provided effectively and efficiently for the proposal, taking into account that the capacity provided by existing or committed infrastructure may already be needed for and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term.</p> <p>..."</p> <p>(See also our requested relief on definitions used in this policy)</p>
S115.081	Chapter 4.3: Allocation of responsibilities	Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S115.082	Chapter 4.3: Allocation	Policy FW.6: Allocation of responsibilities	Oppose	This policy is redundant as it simply repeats provisions of the RMA and NPS-FM.	Delete Policy FW.6.

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	of responsibilities	es for land use and development controls for freshwater			
S115.083	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy CC.16 to make it clear it does not apply to city and district councils.
S115.084	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy CC.18 to make it clear it does not apply to city and district councils.
S115.085	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy 65 to make it clear it does not apply to city and district councils.
S115.086	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and	Support	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.

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		retention - non-regulatory			
S115.087	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.
S115.088	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p> <p>It is also unclear what is achieved by a direction in the Regional Policy Statement that the Regional Policy Statement should be amended.</p>	Delete Policy IE.3
S115.089	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p> <p>We also oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.</p>	Delete Policy IE.4
S115.090	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy 67 to make it clear it does not apply to city and district councils.

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		cs of well-functioning urban environments - non-regulatory			
S115.091	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 1: District plan implementation	Support in part	Support insofar as any consequential amendments to the list of policies are made where we have sought the deletion of those policies.	Consequential amendment to the list of policies to reflect policies where we seek deletion
S115.092	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 3: Wellington Regional Land Transport Plan implementation	Support	No reasons given	Retain as notified
S115.093	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 4: Consideration - resource consents, notices of requirement and when changing, varying or reviewing plans	Support in part	The method is appropriate if the policies listed are modified so that they are less prescriptive and less complicated, and repeated statements of higher order requirements of the RMA and national policy statements are removed or, modified to have a clear relevance from a regional perspective or interpretation	Consequential amendment to the list of policies to reflect policies where we seek deletion.
S115.094	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support	No reasons given	Retain as notified
S115.095	Chapter 4.5: Methods	Method 23: Information about	Support	No reasons given	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	to implement policies (non-regulatory methods)	natural features to protect property from natural hazards			
S115.096	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 25: Information about the provision of walking, cycling and public transport for development	Support	No reasons given	Retain as notified
S115.097	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities. It is also inappropriate for a method to direct action through the Wellington Regional Leadership Committee which is not a statutory body with responsibilities under the resource management system.	Amend Method UD.1 to remove implementation by city and district councils and remove reference to the Wellington Regional Leadership Committee.
S115.098	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities. See also our comments on proposed Policy IM.1	Amend Method IM.1 so that it does not apply to city and district councils. If the method is retained, amend by deleting clauses (f) and (g).
S115.099	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Oppose	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Delete new Method FW.2
S115.0100	Chapter 4.5: Methods	Method 17: Reducing waste and	Oppose	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities	Amend Method 17 so that it does not apply to city and district councils.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	to implement policies (non-regulatory methods)	greenhouse gases emissions from waste streams			
S115.0101	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Oppose	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities	Amend Method 22 so that it does not apply to city and district councils.
S115.0102	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 31: Protocol for management of earthworks and air quality between local authorities	Support	Support the deletion of this method	Delete Method 31 as proposed.
S115.0103	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 32 so that it does not apply to city and district councils.
S115.0104	Chapter 4.5:	Method 33: Identify	Support	No reasons given	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Methods to implement policies (non-regulatory methods)	sustainable energy programmes			
S115.0105	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 34 so that it does not apply to city and district councils.
S115.0106	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 35: Prepare a regional stormwater action plan	Support	No reasons given	Retain as notified
S115.0107	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 40: Sign the New Zealand Urban Design Protocol	Support	No reasons given	Retain as notified
S115.0108	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 46: Develop complex development opportunities	Oppose	<p>The term "complex development opportunity" is not adequately defined (see our comment on the definition) and the method is not adequately supported by higher order objectives and policies.</p> <p>We also oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.</p> <p>It is also inappropriate for a method to direct action through the Wellington Regional Leadership Committee which is not a</p>	<p>Delete Method 46.</p> <p>If the method is retained, amend Method 46 so that it does not apply to city and district councils and remove reference to the Wellington Regional Leadership Committee.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				statutory body with responsibilities under the resource management system.	
S115.0109	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Oppose	This method is redundant as it is already a requirement of the National Policy Statement on Urban Development.	Delete Method UD.2
S115.0110	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method CC.4 so that it does not apply to city and district councils.
S115.0111	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy.	Delete Method IE.2
S115.0112	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Oppose	Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems. We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	Retain existing Operative Method 21. Failing that, amend the deadline from 30 June 2025 to 5 years after RPS Change1 becomes operative.
S115.0113	Chapter 4.5: Methods to	Method 53: Support mana whenua /	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 53 so that it does not apply to city and district councils.

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	implement policies (non-regulatory methods)	tangata whenua and community restoration initiatives for indigenous ecosystems			
S115.0114	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Method 54 so that it does not apply to city and district councils.
S115.0115	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 56: Assist the community to reduce waste and use water and energy efficiently	Support	Support the deletion of this method as proposed	Delete Method 56 as proposed.
S115.0116	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	General comments - anticipated environmental results	Support in part	Not stated	Consequential amendments to reflect relief sought on related provisions.
S115.0117	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought</p>	Delete Appendix 1A.

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				necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	
S115.0118	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	No reasons given	Consequential amendments to definitions, deleted definitions, and new definitions as appropriate for our other requested relief.
S115.0119	Appendix 3: Definitions	Complex development opportunities	Support	It is inappropriate for a definition to outsource the meaning of a definition to a third party, in this case the Wellington Regional Leadership Committee, particularly regarding decisions to be made by that third party in future.	Delete definition. (Note our other relief would delete all uses of this term in the RPS in any case).
S115.0120	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	New definition for "High carbon passenger transport modes". A definition for this term is needed to implement our requested relief for Policy CC.1. See the discussion of the term "low and zero-carbon modes" for details.	New definition: "Means passenger transportmodes that are not <i>low and zero-carbon modes</i> ."
S115.0121	Appendix 3: Definitions	High density development	Support in part	The use of the term "minimum building height" is unclear. District plans do occasionally apply minimum building height standards but typically provide a maximum or anticipated building height.	Amend as follows:"Means areas used predominately for commercial, residential and mixed use urban activities with high concentration and bulk of buildings, such as apartments, and other compatible activities with a minimum an anticipated building height of at least 6 stories."
S115.0122	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	New definition for "low and zero-carbon modes" A definition for this term is needed for Policy CC.1 both as proposed and to implement our requested relief. We have not provided the text for a proposed definition because this is an area best drafted by the Regional Council for consistency with other plans, policies, and strategies. We would assume the definition would encompass at least walking, cycling, and some public transport. The degree to which the definition covers micromobility, fossil-fuelled public transport, or personal electric cars should be consistent with other strategies on mode shift covering funding.	Provide a definition for the term that aligns with the national Emissions Reduction Plan, Waka Kotahi/NZTA's Regional Mode Shift Plan - Wellington, and other relevant strategies for mode shift.
S115.0123	Appendix 3: Definitions	Medium density residential development	Support in part	The use of the term "minimum building height" is unclear. District plans do occasionally apply minimum building height standards but typically provide a maximum or anticipated building height. In addition, the circumstances where this term is used either make it clear that the development is residential, or there is no policy reason to limit the development to being residential. It	Amend the term itself (and references): "Medium density residential development" And the definition: "Means areas used predominately for residential urban activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible

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				should be amended to be consistent with the term "high density development"	activities with a minimum an anticipated building height of at least 3 stories. And amend the term throughout the RPS when used.
S115.0124	Appendix 3: Definitions	Nature-based solutions	Not Stated / Neutral	This definition is not clear enough to provide direction to plan users. The need for a significant number of examples illustrates this.	Amend the definition to provide clarity about what is covered by the term.
S115.0125	Appendix 3: Definitions	Regionally significant centres	Support	Support the amendments to the definition as proposed.	Amend the definition as proposed.
S115.0126	Appendix 3: Definitions	Urban areas	Support in part	Support but seek amendment to be consistent with the term used for our district plan: the City of Lower Hutt District Plan.	Instead of amending to " Lower Hutt city ", amend as " City of Lower Hutt-city ".

S139 Ian Gunn

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S139 Ian Gunn					
S139.001	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Support in part	A number of objectives/policies/methods (e.g. CC4, CC5 and CC6) require publicity of natural hazards, including flooding, especially those which are changing as a result of climate change	Require greater publicity of natural hazards.
S139.002	General comments	General comments - overall	Support	Progress has been made to truly create a co governance structure in resource management. An iwi point of view will add a new dimension and advance resource management in the Wairarapa due to their holistic approach and feelings for the whenua and awa.	Retain as notified.
S139.003	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support in part	It is time Doc, Iwi Councils agreed a best practise management operation for the ranges to both reduce flood risk and improve water resilience.	Develop best practice management between DOC, iwi and councils to reduce flood risk and improve water resilience.

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S139.004	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support	Nature-based solutions offer a wide variety of benefits compared to hard infrastructure.	Retain as notified.
S139.005	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	How are the hazards defined as low to moderate eg for flooding, is there a specific standard for these terms	Define low to moderate hazards.
S139.006	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	With the focus on nature based solutions it is highly likely that the creation of wetlands/bunds/low dams will be used to minimise the impact of flooding ie slowing down runoff.	Recognise that nature based solutions are likely to be utilised.
S139.007	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	Is the 1%AEP is calculated with the climate change factor added?	Clarify that 1% AEP calculations must factor in climate change.
S139.008	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Term regionally significant doesn't appear to include stopbanks/flood retention structures. See p223	(c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, regionally significant infrastructure (including stopbanks/flood retention structures) or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future;
S139.009	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention -	Support	The potential of nature based solutions to slow water down, maintain stream/river base flows reduce sedimentation, improve water quality, improve carbon sequestration etc. There is an opportunity for council to specifically develop prototypes to advance the nature based approach.	Add examples of nature based solutions to the policy eg. more room for rivers, allow temporary shallow flooding outside existing stop banks, resulting increased natural character of waterways. include research and prototyping of nature based solutions. Add to the explanation: Flood management is undergoing

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		non-regulatory			a change in approach from hard structures down river to the exploration of NBS up river and on the flood plain. The creation or rehabilitation of wetlands, construction of bunds all have multiple benefits varying to reducing flood peaks to increasing water resilience.
S139.010	Appendix 3: Definitions	Nature-based solutions	Support in part		Definition of Nature based solutions be expanded to include farming scale methods such as swales, bunds, leaky dams to slow down runoff ie reduce flood peaks plus a range of additional benefits.
S139.011	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Strongly support.	Retain clause (b) as notified.
S139.012	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Not Stated / Neutral	There is an opportunity for council to specifically develop prototypes to advance the nature based approach.	Add a method to supports the investigation of prototypes demonstrating the benefits of nature based solutions.
S139.013	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Include a permitted activity to create wetlands/bunds/dams to form a network of nature based solutions.	Require district plans to include rules that enable wetlands, bunds and dams to form a network of nature based solutions.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S154 Investore Property Limited					
S154.001	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Oppose in part	<p>Opposes the removal of Johnsonville from the definition of sub-regional centres and seeks Johnsonville Town Centre be recognised as a sub-regional centre.</p> <p>Under the Operative RPS, Johnsonville is currently appropriately recognised as both a suburban area of regional significance and a sub-regional centre. Johnsonville centre includes regionally and sub-regionally significant facilities and businesses. Johnsonville also has a number of significant community and recreational facilities that serve the sub-region.</p> <p>Consider the change will not give effect to the NPS-UD.</p>	Amend the RPS to include Johnsonville Town Centre as a sub-regional centre and any consequential changes to address the relief sought in the submission.
S154.002	General comments	General comments - overall	Oppose in part	<p>Council is required to amend the RPS to give effect to the NPS-UD and specifically the objectives and policies applying to tier 1 urban environments.</p> <p>Specifically, the requirements to amend its RPS to enable building heights and urban form to reflect demand for housing and business use in metropolitan centre zones under Policy 3 of the NPS-UD.</p> <p>However, the changes proposed under RPS Change 1 are not consistent with the recognition of metropolitan centre zones in the NPS-UD, which make it difficult for the Council to then implement Policy 3. The RPS may fail to give effect to the NPS-UD in this regard.</p> <p>Amendments are not supported as they fail to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.</p> <p>Seeks that RPS Change 1 is amended to enable an urban form in metropolitan centres that reflects the demand for housing and business use. In Johnsonville, this would reflect significant demand and intensification.</p> <p>The amendments to the RPS are disparate and are unlikely to achieve the strategic purpose of the NPS-UD, including Policy 1 of the NPS-UD to contribute to well-functioning urban environments.</p>	Amend RPS to give effect to the NPS-UD to address the relief sought in the submission.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S154.003	Chapter 3.1A: Climate change	Objective CC.3	Support	Supports the amendments to support a reduction in transport emissions set out in Objective CC.3.	Retain as notified.
S154.005	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	Policy 55 fails to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.	Amend Policy 55 to recognise that intensification is to be focused around major centres and rapid transit nodes, to support well functioning urban environments.
S154.007	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Oppose in part	Policy 67 fails to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.	Amend Policy 67 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S154.008	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose in part	Considers the proposed amendment to Policy 31 is not sufficient to give effect to the NPS-UD.	Amend Policy 31 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S154.009	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions -	Oppose in part	The proposed changes will not give effect the NPS-UD.	Amend Policy 33 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		Regional Land Transport Plan			
S154.010	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose in part	Policy UD.3 will not give effect to the NPS-UD.	Amend Policy UD.3 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S154.011	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Oppose in part	The proposed changes will not give effect the NPS-UD.	Amend Chapter 3.9 introduction to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S154.012	Chapter 3.9: Regional form, design and function	General comments - urban development	Oppose in part	<p>Seeks that RPS Change 1 is amended to enable an urban form in metropolitan centres that reflects the demand for housing and business use. In Johnsonville, this would reflect significant demand and intensification.</p> <p>The NPS-UD anticipates that there will be a comprehensive review of district plans and regional policy statements to ensure that they enable an urban form that gives effect to the requirements for well-functioning urban environments in the NPS-UD. RPS Change 1 does not reflect this approach. The amendments to the RPS are disparate and are unlikely to achieve the strategic purpose of the NPS-UD, including Policy 1 of the NPS-UD to contribute to well-functioning urban environments.</p>	Amend the RPS Change 1 to address the relief sought in the submission and make any consequential changes.
S154.013	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	Support the transition to a low-emission region set out in Objective 22. However, Objective 22(j) does not set out clear direction on what is 'appropriate' and 'close to where people live' could be used to support development in a wide range of locations.	Amend the provision to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S154.014	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing	Oppose in part	The proposed changes will not give effect the NPS-UD.	Amend Policy 30 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		the viability and vibrancy of regionally and locally significant centres - district plans			create well-functioning and sustainable urban environments.

S86 Irrigation New Zealand (IrrigationNZ)

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S86 Irrigation New Zealand (IrrigationNZ)					
S86.001	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	Broadly supports the hierarchy of obligations expressed in Objective 12. Notes that the hierarchy fails to regard the importance of irrigation systems and its symbiotic relationship with the health needs of the people and the submission provides further details on the importance of irrigation.	Amend to better reflect the needs of primary industries in the Greater Wellington Region.
S86.002	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	The implementation of the NPS-HPL must be considered in the RPS Change 1, as well as to achieve balance between NPS-UD, NPS-FM and NPS-HPL when either policy reaches the limitations in practice.	Amendment of Policy 44 to give effect to the National Policy Statement on Highly Productive Land 2022 (NPS-HPL).
S86.003	Chapter 3.1A: Climate change	Objective CC.8	Support in part	Ambiguity arises within the provision of Objective CC.8 (and others), for example the use of instruction words such as 'recognising' throughout these provisions. Change 1 should define these instruction words to avoid any interpretative asymmetry between regional councils. There is a need for consultation of a Crown and iwi partnership to ensure these instruction words are universally interpreted and adhered to by councils. This will ensure that councils uphold their obligations under the RPS Change 1 and other requirements such as the NPS- FM.	Amend Objective CC.8 to define the instructional words that relate to giving effect to tangata whenua and Te Ao Māori. This should be done in consultation with iwi/Crown Treaty partners.
S86.004	Chapter 4.2: Matters to	Policy IM.1: Integrated management - ki uta ki	Support in part	Ambiguity arises within the provision of Policy IM.1 (and others), for example the use of instruction words such as 'recognising' throughout these provisions. Change 1 should define these instruction words to avoid any interpretative	Amend Policy IM.1 to define the instructional words that relate to giving effect to tangata whenua and Te Ao Māori. This should be done in consultation with iwi/Crown Treaty partners.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	be considered	tai - consideration		asymmetry between regional councils. There is a need for consultation of a Crown and iwi partnership to ensure these instruction words are universally interpreted and adhered to by councils. This will ensure that councils uphold their obligations under the RPS Change 1 and other requirements such as the NPS- FM.	
S86.005	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Further clarification to be provided to ascertain other types of storage to within sub-clause (b), such as catchment for irrigation purposes, to ensure that primary industries are sufficiently accounted for.	Amendment sub-clause (b) of Policy FW.7 to provide further specification of natural and built solutions to attenuate and retain water to provide adequate provision for primary industries.
S86.006	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support in part	The importance of a regional water strategy and its direct relationship to the quality and quantity of freshwater has been underestimated. There needs to be a greater emphasis on the importance of water storage as part of future resilience. Under Method 34, biodiversity and cultural factors are the only considerations, with no mention of wider factors, such as primary industry. The aims of a regional water supply plan should take direction from the Wairarapa Water Resilience Strategy (WWRS).	Amend Method 34 to place a greater emphasis on the importance of water storage as part of a resilient regional water supply strategy.

S93 Isabella Cawthorn

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S93 Isabella Cawthorn					
S93.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	The RPS helps to deliver more homes without higher transport-related greenhouse gas emissions. The policy deters greenfield subdivisions that externalise environmental and infrastructure costs. There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools to TDM - provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S93.002	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.
S93.003	Chapter 3.9:	General comments -	Support	Creating climate-resilient urban areas are supported.	Retain, refine and enhance provisions.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regional form, design and function	urban development			
S93.004	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	The biodiversity provisions are supported.	Retain, refine and enhance provisions.
S93.005	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support all councils ensuring that more homes doesn't mean more emissions. It's shameful that in this day and age, traffic-inducing greenfield subdivisions of single-family detached houses are still the lion's share of new homes being built. Everyone knows it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils - of all stripes - to do everything they possibly can to get good intensification for growth, rather than greenfield. I'm not opposed to greenfield that can pass the test of being founded on high accessibility, not mobility, and whose movement network is very sustainable	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.

S77 James Burgess

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S77 James Burgess					
S77.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Supports the changes proposed to reduce the climate impact of new housing, however need to remove more barriers to more compact, livable developments with better transport choice and lower environmental impact.	No specific relief requested except for additional staff resources and training and enforcement measures to better achieve more compact, liveable developments.
S77.002	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.3: Travel demand management plans	Support	Supports Method CC.3 that introduces travel demand management plans. The thresholds for their use should be as low as possible so that they are used wherever they can have an impact.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S77.003	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	Supports Policy CC.2 that introduces travel demand management plans. The thresholds for their use should be as low as possible so that they are used wherever they can have an impact.	Retain as notified.

S37 Jennifer Van Beynen

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S37 Jennifer Van Beynen					
S37.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions relating to good intensification and reducing urban emission, rather than greenfield.
S37.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other policy tools to TDM, provisions should be strengthened, enhanced, made more sophisticated and more comprehensive.
S37.004	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification.
S37.005	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
S37.006	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support provisions relating to climate-resilient urban areas.	Retain, refine and enhance provisions.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S37.007	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support provisions relating to indigenous biodiversity.	Retain, refine and enhance submissions.

S82 Jonathan Markwick

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S82 Jonathan Markwick					
S82.001	Chapter 3.1A: Climate change	General comments - climate change	Support	Support the objectives in this section	Retain as notified.
S82.002	Chapter 3.1A: Climate change	Objective CC.5	Support in part	Consider incentivising native forests to support ecological and biodiversity goals.	Retain as notified.
S82.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support allowing more housing to be built where it is most in demand (the inner city and inner suburbs). This will increase housing affordability, livability and transport sustainability.	Retain as notified.
S82.004	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Support	Support all policies that enforce emissions reductions through mode-shift.	Retain as notified.
S82.005	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Support	Support all policies and changes that encourage or enable high density housing in the city centre and inner suburbs	Retain as notified.
S82.006	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure	Support	Support policy to enforce emissions reductions through mode-shift.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		e - consideration			

S169 Kahungunu Ki Wairarapa

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S169 Kahungunu Ki Wairarapa					
S169.001	Chapter 3.1A: Climate change	Issue 5: Climate change threatens tangible and spiritual components of Māori well-being	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169.002	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169.003	Chapter 3.4: Fresh water (including public access)	Objective 12	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	
S169.004	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169.005	Chapter 3.4: Fresh water (including public access)	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169.006	Chapter 3.8: Natural hazards	Objective 20	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169.007	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	
S169.008	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169.009	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	In regard to (a), on behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169.010	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169.011	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		and well-being of water bodies and freshwater ecosystems - consideration		Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	
S169.012	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169.013	General comments	General comments - overall	Not Stated / Neutral	<p>The purpose of the Resource Management Act (1991) as outlined in Section 5, subsection 2 of the act is to ensure sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while--</p> <p>(a) sustaining the potential of natural and physical resources (including water) to meet the reasonably foreseeable needs of future generations; and</p> <p>(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and</p> <p>(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.</p> <p>This purpose of is met by including aspects of national importance as outlined in this act, especially Section 6, subsection (e) that reads In achieving the purpose of this Act, all persons</p>	Retain the iwi expressions of Te Mana o Te Wai as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the matters of national importance including: the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga. Another aspect of this act is to the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga</p> <p>In the iwi expressions of Te Mana o Te Wai iwi are supporting section 7 of the the Resource Management Act, where it states: all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to</p> <p>1. kaitiakitanga:(aa) the ethic of stewardship (b) the efficient use and development of natural and physical resources: (ba) the efficiency of the end use of energy: © the maintenance and enhancement of amenity values:(d) intrinsic values of ecosystems: (f) maintenance and enhancement of the quality of the environment: (g) any finite characteristics of natural and physical resources: (h) the protection of the habitat of trout and salmon: (i) the effects of climate change:</p> <p>The iwi depictions of te mana o te wai following the tenets of section 8 of the Resource Management Act or the Treaty of Waitangi section where it states:</p> <p>In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and</p>	

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	
S169.014	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified.

S158 Kāinga Ora Homes and Communities

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S158 Kāinga Ora Homes and Communities					
S158.001	Chapter 4.2: Matters to be considered	General comments - consideration policies	Oppose	Considers that all of the policies in Chapter 4.2 have been worded to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria). Seek that all policies directing matters of consideration for resource consent are deleted from the regional policy statement in full.	That Chapter 4.2 is deleted from the regional policy statement in full. OR In the alternative that this relief is not granted, seek that the policies are reworded to state the intended outcome such that regional and district plans giving effect to the regional policy statement are suitably informed of the desired outcomes to address identified resource management issues.
S158.002	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Consequential to submission point 1, seek that Policy UD.3 within Chapter 4.2 is retained and amended as sought by this submission and relocated to Chapter 4.1.	Retain Policy UD.3 as amended within the relief sought in this submission and relocate to Chapter 4.1.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S158.003	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	Seeks clarity on sub point (f) of this objective to either expand on what the future pressures on climate change are or whether this sub-point can be redrafted to be more directive as per the relief sought.	Amend sub-point (f) as follows: (f) responds effectively to the current and future pressures of climate change, population growth and development. (f) is resilient to the likely current and future effects of climate change.
S158.004	Chapter 3.1A: Climate change	Objective CC.1	Support in part	Seeks a minor change to sub point (c) so that the objective includes all planned infrastructure. It is unclear to what 'well-planned' means, and considers it best to remove the quantification of 'well'.	Amend Objective CC.1 as follows: By 2050, regional and district plans contribute to the Wellington Region being is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of: a. sustainable air, land, freshwater, and coastal management, b. well-functioning urban environments and rural areas, and c. well planned infrastructure.
S158.005	Chapter 3.1A: Climate change	Objective CC.3	Support in part	Whilst supports the intent of the objective, concerned how this objective would be achievable under an RMA framework. The objective would be reliant on other factors at a national level to incentivise the goals of the objective. Regional and District Councils are limited to new land use, subdivision and development (or renewal of discharge permits) to be able to implement any change	Amend the objective to be achievable within an RMA legislative framework. The objective could be amended as such: To support the global goal of limiting warming to 1.5 degrees Celsius, net-Net greenhouse gas emissions from transport, agriculture, stationary energy, waste and industry in the Wellington Region are reduced by 2030 and achieves net zero emissions by 2050. -(a) By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels, including a:(i) 35 percent reduction from 2018 levels in land transport-generated greenhouse gas emissions, and(ii) 40 percent increase in active travel and public transport

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					mode share from 2018 levels, and (iii) 60 percent reduction in public transport emissions from 2018 levels, and (b) By 2050, to achieve net zero emissions
S158.006	Chapter 3.1A: Climate change	Objective CC.4	Support in part	Seeks clarity as to how the improvement of the health and resilience of people falls within this objective. The focus of the associated policies are limited to ecosystems and the natural environment and seeks amendments. Seek that a definition or examples of nature-based solutions are included for provide clarity. Amend the objective to focus on the health and well-being of people. It is unclear how it will improve resilience of people.	Amend the objective as such: Nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and well-being resilience of people, biodiversity, and the natural environment. [Note: End of amendment] AND Include a policy to link the health and wellbeing of people within the related policies. Otherwise the objective should remove the reference to people and the focus should be on ecosystems and the natural environment - which in turn will support, enhance and improve people's health and well-being. AND Include a definition and examples of nature-based solutions.
S158.007	Chapter 3.1A: Climate change	Objective CC.5	Support in part	Supports this objective, the objective is not measurable as to what extent permanent forest in the region is increase by. A definition for carbon sequestration should also be provided.	Amend the objective to become measurable as follows: By 2030, there is an increase in the area of permanent forest in the WellingtonRegion of 10% , maximising benefits for carbon sequestration, indigenusbiodiversity, land stability, water quality, and social and economic well- being. AND Include a definition for carbon sequestration. Carbon sequestration is the process of capturing, securing and storing carbondioxide from the atmosphere through means such as maintaining, protectingand planting forest areas.
S158.008	Chapter 3.1A: Climate change	Objective CC.6	Support in part	The objective is considered too broad and is not measurable. Seeks clarity as to what degree of increase is considered appropriate.	Amend the objective to include measurable outcomes to define what an increase of the community's resilience is over the short, medium and long term. The resilience of communities and the natural environment is increased to avoid loss of life and damage to property to the short, medium, and long term due to the effects

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					of climate change. Improved resource management and adaptation planning by regional and district councils, including increase
S158.009	Chapter 3.1A: Climate change	Objective CC.8	Support in part	Supports this objective but is unsure what the outcome of the objective is. The objective is also emotive and unsure how the objective is achievable within a RPS framework.	Amend the objective as follows: Iwi and hapū are empowered to make decisions to achieve climate resilience in their communities. Land use, development and subdivision on Māori land is resilient to the likely current and future effects of climate change
S158.010	Chapter 3.8: Natural hazards	Objective 20	Support in part	Supports the intent of the objective, however seeks that the objective is amended to provide clarity but also recognises that natural hazard and climate change mitigation and adaptation activities are not limited to mitigation measures.	Amend the objective as follows: Natural hazard and climate change mitigation and adaptation activities do not increase minimise the risks from natural hazards and do not have an adverse effect on impacts of Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity
S158.011	Chapter 3.8: Natural hazards	Objective 21	Support in part	Seeks that the objective is amended to provide clarity to provide for measurable outcomes. The words strengthened and better prepared are ambiguous.	Amend the objective to provide measureable clarity. The resilience of our communities and the natural environment is strengthened to avoid loss of life and damage to property due to the to the short, medium, and long-term effects of climate change, and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.
S158.012	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Oppose in part	Seeks that chapter focuses on the regional form, design and function of the urban and rural environments. The proposed amendments and inclusions in the chapter create a 'plan within a plan' setting, for example, Objective 22 requires 11 matters to be met for enabling an urban development. Amendments are sought to the proposed amendments for simplification and implementation. The RPS should be read as a whole, and there is no need to include all matters that is covered across the various chapters of the RPS into one objective. The focus should be on enabling urban development, form and function, including housing and infrastructure.	Amend the chapter introduction as follows: Regional form is about the physical arrangement within and between urban and rural communities. Good urban design seeks to ensure that the design of buildings, places, spaces, and networks work well for mana whenua / tangata whenua and communities, and are environmentally responsive. Well-functioning urban environments The concept of well-functioning urban environments was introduced in the National Policy Statement on Urban Development 2020. There are a number of characteristics and qualities that contribute to forming a well-functioning urban environment. Well-functioning urban environments enhance the quality of life for residents as it is easier to get around, allow for a greater supply and choice of housing

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					<p>close to where people work or to public transport, town centres are and provide vibrant, safe, and cohesive centres that enhance business activity. Well-functioning urban environments enable communities and businesses to be more resilient to the effects of climate change, and the uptake of zero and low-carbon emission modes is supported throughout the region. Well-functioning urban environments have compact urban form and are well-designed and planned through the use of spatial and development strategies and use of design guidance. Well-functioning urban environments are low impact, incorporating water sensitive urban design and managing the effects on other regionally significant values and features as identified in this RPS. Commercial Centres The Central Wellington city contains the central business district for the whole region. Its continued viability, vibrancy and accessibility are important to the whole region. There are also other regionally significant centres that are metropolitan centres that are an important part of the region's form and centres distribution. These centres are significant areas of transport movement and civic and community investment. They also have the potential to support new development and increase the range and diversity of activities across the region. Good quality high and medium density housing in and around these centres, and existing and planned rapid transit stops, would provide increased housing choice and affordability. Further medium and high density development must be enabled within the fast-growing districts of the Region, being those identified in the National Policy Statement for Urban Development as tier 1 territorial authorities. If this development occurs, it will further improve housing affordability and provide for additional housing choice across the region.</p>

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					<p>Encouraging use and development of existing centres of business activity can also lead to social and economic benefits. Additional local employment around these centres could also can provide people with greater choice about where they work and live in the region. The design of urban and rural communities/smaller centres, the region's industrial business areas, the port, the airport, the road and public transport network, and the region's open space network are fundamental to well-functioning urban environments and a regional form. Regional growth and urban development</p> <p>The Wellington Regional Growth Framework³ provides a spatial plan that has been developed by local government, central government, and iwi partners in the Wellington/Horowhenua region. It sets out the key issues identified for urban growth and development and provides a 30-year spatial plan that sets a long-term vision for changes and urban development in the Wellington Region. The region has a strong corridor pattern, yet is generally compact. The Wellington Regional Growth Framework identifies the three key growth corridors within the Wellington Region being the western, eastern and Let's Get Wellington Moving growth corridors. Two additional potential west-east corridors are identified. The corridors are shown in Figure 3 below.</p> <p>This corridor pattern is a strength for the region. It reinforces local centres, supports passenger transport, reduces energy use and makes services more accessible.</p> <p>[Image] [Figure 3: Wellington Regional Growth Framework]</p> <p>The region is facing growth pressure. Based on the May 2022 Wellington Regional Housing and Business Development Capacity Assessment (HBA), the Greater Wellington urban environment is expected to grow by</p>

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					<p>around 195,000 people by 2051. As of May2022, district plans within the Greater Wellington region, does not provide sufficientdevelopment capacity for the long term with a shortfall of more than 25,000 dwellings. In more and more areas of the region, housing is unaffordable for many people. Across the region the average rent per week increased by 24 percent between 2018 and 2021and the average house price increased by 46 percent between 2018 and 20214. The ratioof house values to annual average household income has been steadily increasing ashouse prices have risen without equivalent rises in incomes. For instance, the ratio forWellington City as at March 2021 was 6.75. Home ownership and access to affordablehousing issues are exacerbated for Māori; 43 percent of Māori living in the Wellingtonregion were living in owner occupied dwellings compared to 55 percent of the overallpopulation6.</p> <p>National direction provided through the National Policy Statement on UrbanDevelopment 2020 and the Resource Management (Enabling Housing Supply and OtherMatters) Amendment Act 2021 supports increased supply of housing that includes arange of housing typologies and sizes to assist in meeting the housing needs of the region. affordable housing. Both legislative documents direct urban intensification anddevelopment in around the urban environments, centres and existing and planned rapidtransit stops, subject that there are no qualifying matters limiting development. However, high levels of development without suitable constraints risks undermining othercharacteristics and qualities of a well-functioning urban environment. We need torecognise and provide for other regionally significant values and features, includingmanaging freshwater, indigenous biodiversity, values of significance to mana whenua /tangata whenua and management of the</p>

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					<p>coastal environment. Most of the region, including its existing urban areas, has significant exposure to multiple natural hazards, and there is continuing demand to build in coastal and/or natural hazard-prone areas. Medium and high-density development that is enabled through national direction has the potential to be reduced by Councils' identifying qualifying matters in their District Plan that will result in less enabled development capacity and growth across the region result in poor urban design outcomes, in the absence of sufficient design guidance. Development pressure can reduce transport efficiency and limit the ability of all centres to provide community services and employment. Regionally significant issues The regionally significant issues and the issues of significance to the Wellington region's territorial authorities and iwi authorities for regional form, design and function are: A-1. Lack of housing supply and choice The Wellington Region lacks sufficient, affordable, and quality (including healthy) housing supply and choice to meet current demand, the needs of projected population growth and the changing needs of our diverse communities. There is a lack of variety of housing types and sizes across the region, including papakāinga and medium and high density residential living in and around centres and existing and planned transit nodes. All of which impacts housing affordability in the region. Housing affordability has declined significantly over the last decade, causing severe financial difficulty for many lower income households, leaving some with insufficient income to provide for their basic needs and well-being. There is a lack of supporting infrastructure to enable the development of sufficient housing and the provision of quality urban environments. 2. Lack of infrastructure There is a lack of supporting</p>

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					<p>infrastructure and sufficient infrastructure to enable the development of housing and provision of quality urban environments. Enabling housing requires infrastructure, both physical and social infrastructure to support wellfunctioning urban environments. Physical infrastructure includes roading and threewaters infrastructure. Social infrastructure includes community facilities and services, and open spaces. Territorial Authorities, network utility operators and infrastructure providers are encouraged to continue providing the additional infrastructure needed to meet the needs of current and future communities. B- 3. Inappropriate land use, activities and development</p> <p>Inappropriate and poorly managed urban land use and activities in parts of the Wellington region have damaged, and continue to jeopardise, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increased the exposure of communities to the impacts of climate change. This has adversely affected mana whenua/ tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</p> <p>This has also led to poor quality urban environments. Clear direction is needed to where land-use and development is appropriate and where it is not appropriate. 1. Poor quality urban design Poor quality urban design can adversely affect public health, social equity, land values, the cultural practices and wellbeing of mana whenua / tangata whenua and communities, the vibrancy of local centres and economies, and the provision of, and access to, civic services. It can also increase the use of non-renewable resources and vehicle emissions in the region.</p> <p>4. Out of sequence development Out of sequence</p>

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					<p>Sporadic, uncontrolled and/or uncoordinated, development (including of infrastructure) can adversely affect the region's compact form and function. This can, among other things, result in:</p> <ul style="list-style-type: none"> (a) new development that is poorly located in relation to existing infrastructure (such as roads, public transport, water supply, sewage and stormwater systems) and is costly or otherwise difficult to service (b) development in locations that restrict access to the significant physical resource in the region - such as aggregate (c) the loss of rural or open space land valued for its productive, ecological, aesthetic and recreational qualities (d) insufficient population densities to support public transport and other public services (e) development in locations that undermine existing centres and industrial employment areas (f) loss of vitality and/or viability in the region's central business district and other centres of regional significance (g) displacement of industrial employment activities from established industrial areas (h) adverse effects on the management, use and operation of infrastructure from incompatible land uses under, over, on or adjacent. (i) adverse effects on mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. <p>3. 5. Lack of Integration of land use and transportation</p> <p>A lack of integration between land use and the region's transportation network can create patterns of development that increase the need for travel, the length of journeys and reliance on private motor vehicles, resulting in:</p> <ul style="list-style-type: none"> (a) increased emissions to air from a variety of pollutants, including greenhouse gases (b) increased use of energy and reliance on non-renewable resources

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					<p>(c) reduced opportunities for alternate means of travel (such as walking and cycling), increased community severance, and increased costs associated with upgrading roads</p> <p>(d) increased road congestion leading to restricted movement of goods and services to, from and within the region, and compromising the efficient and safe operation of the transport network</p> <p>(e) inefficient use of existing infrastructure (including transport orientated infrastructure).</p>
S158.013	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Oppose	Opposes the requirements for subdivision, use and development consent applicants to provide travel demand management plans. Considers that travel management is better undertaken at a neighbourhood scale and that they are prepared by councils rather than applicants.	Delete the policy in its entirety.
S158.014	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	Supports the intent of the policy, however concerned that the policy places significant burden on district councils to enable a shift to low and zero-carbon emission transport infrastructure in a very short period. Whilst district plans can include enabling objectives, policies and rules to support the policy's intent, there are a number of factors that would hinge on the development of such transport options, including that councils only have jurisdiction over new development, often other reasons of resource consent are triggered such as earthworks, vegetation clearance and structures.	<p>Amend the policy and explanation as follows: By 30 June 2025, district plans shall include objectives, policies, rules and methods that promote the construction of multi modal transport enable infrastructure that supports the reduction in greenhouse gas emissions for multi modal transport that contribute to reducing greenhouse gas emissions.</p> <p>Explanation District plans must provide a supportive planning framework (for example, supportive objectives and policies permitted activity status) for the reduction in greenhouse gas emissions zero and low-carbon for multi modal transport infrastructure, such as public transport infrastructure, cycleways and public EV charging network.</p>
S158.015	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and	Support in part	Considers that this policy can be combined with Policy CC.14 rather than referring to Policy CC.14 within the policy itself.	Amend and combine Policy CC.4 with Policy CC.14.

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		regional plans			
S158.016	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support in part	Seeks clarity as to why district plans are included within this policy as offsetting is limited to regional plans.	Amend policy as follows: Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans District and regional Regional plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply.
S158.017	Chapter 4.1: Regulatory policies	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support	Supports the deletion of policy 10.	Support deletion.
S158.018	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Supports this policy and in particular the requirement that the Regional Land Transport Plan includes provisions that promote equitable and accessible high quality active mode infrastructure	Retain as notified.
S158.019	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area	Support in part	Notes the NPS-FM does not prohibit the piping of rivers, but rather implements the effects management hierarchy of avoid, mitigate and remedy.	Amend sub-point (i) as follows: (i) Require riparian buffers for all waterbodies and avoid piping of rivers where practicable and where the effects cannot be avoided, they are minimised or remedied. Aquatic offsetting or compensation may be used where the piping of the river cannot be

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		- regional plans			avoided, minimised or remedied.
S158.020	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	Seeks that this policy is separated into regional plan functions and district plan functions. Considers that the policy could also be redrafted to improve readability by cascading each requirement.	Amend and separate the policy into regional and district plan functions. New policies will need to be created. AND Include cascading points under the chapeau of 'the control of earthworks and vegetation'.
S158.021	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	Seeks that the policy is amended to remove the requirement to improve the efficiency of the end use of water on a per capita basis. Seeks that the policy rather seek for the inclusion of water efficient methods are installed per new household or alternative solutions are provided within larger developments where more efficient solutions that are more 'nature-based' could be used. e.g. community rain gardens, stormwater ponds.	Amend the policy as follows: District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users , including where practicable: (a) provisions improving the efficiency of the end use of water on a per capita basis for new developments per new household equivalent through devices such as low flow fixtures; and (b) provisions improving the efficiency of the end use of water at a community scale for large scale developments; and (c) provisions requiring alternate water supplies for non-potable use in new developments.
S158.022	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Oppose in part	Recognise the need for financial contributions, consider that financial contributions for stormwater mitigation should be limited to the effects at point of connection for a development allotment. In addition, alternative solutions for stormwater treatment should be provided for to manage quality and quantity of stormwater within a development, which would then offset the payment of financial contributions.	Amend Policy FW.4 as follows: District plans shall may include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent for effects associated with stormwater quality and quantity treatment at the point of connection to the development only where off site is required , as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development

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					<p>Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose. A financial contribution will not be required where on site stormwater quantity and quality mitigation is provided to an adequate level to reduce downstream effects.</p> <p>Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence</p>
S158.023	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Seeks that this policy is aligned within the NPS-IB once gazetted.	Amend the policy to align with the NPS-IB once gazetted.
S158.024	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Seeks that this policy is aligned within the NPS-IB once gazetted.	Amend the policy to align with the NPS-IB once gazetted.
S158.025	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at	Support	Supports the inclusion of a hazard and management hierarchy to manage the effects of hazards on subdivision, use and development.	Retain as notified.

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S158.026	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support in part	Seeks a regionally consistent approach in the hierarchy of centres and therefore seeks amendments to the policy to align with those submissions (of IPI Plan Changes) and the national planning standards.	<p>Amend the policy as follows: District plans shall include policies, rules and/or methods that enable and manage a range of land use activities, including high density residential living that maintain and enhance the viability and vibrancy of:</p> <ol style="list-style-type: none"> 1. the regionally significant central business district of Wellington City centre; 2. other regionally significant centres The Metropolitan Centres of: <ol style="list-style-type: none"> (i) Johnsonville (ii) Kilbirnie (iii) Upper Hutt Centre (iv) Lower Hutt Centre (v) Petone (vi) Porirua (vii) Paraparaumu (viii) Masterton 3. The Town Centres locally significant centres of: <ol style="list-style-type: none"> (i) Kilbirnie (ii) Mirimar; (iii) Newtown; (iv) Tawa; (v) Petone; (vi) Naenae (vii) Waterloo (viii) Mana; (ix) Johnsonville (x) Ōtaki (Township); (xi) Ōtaki (Main Road); (xii) Paraparaumu Beach; (xiii) Raumati Town (xiv) Waikanae; (xv) Featherston; (xvi) Greytown (xvii) Carterton; and (xviii) Martinborough <p>Explanation Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region for which district plans must maintain and enhance their vibrancy and vitality. The centres identified are of significance to the Wellington region's to achieve a wellfunctioning urban environment and compact form that provides many employment opportunities, is well-served by</p>

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					<p>public transport and has a high demand for housing and business activities for economic development, transport movement, civic or community investment. Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. Development and intensification of these areas will achieve a regional form that will contribute to meeting the objectives and policies of the RPS associated with climate change and land-use and transportation integration. It is also important for their prosperity and resilience in the face of social and economic change. Wellington City centre The regional central business district is the major centre in the Wellington region; the other key centres also provide significant business, retailing and community services. This policy does not limit territorial authorities from identifying additional centres of local significance within the district plan</p>
S158.027	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	Seeks a regionally consistent approach in the hierarchy of centres and therefore seeks amendments to the policy to align with those submissions (of IPI Plan Changes) and the national planning standards. Also considers that the policy as notified does not add any additional value than what is stated within the NPS-UD and therefore seeks better direction for where high density development should occur and within prescribed minimum walkable catchments.	<p>Amend Policy 31 as follows: District plans shall include policies, rules and/or methods that identify and enable a range of different building heights and intensification density within urban areas where it contributes to maintaining, establishing or improving the qualities and characteristics of well-functioning urban environments, including as a minimum: (a) For any tier 1 territorial authority, identify areas for high density development within: i. As much capacity development capacity as possible to maximise the benefits of intensification within the Wellington City Centre and at least a 15-20 minute / 1200m-1600m walkable catchment from the edge of the City Centre Zone; ii. Building heights of at least 6 storeys and density of urban form to reflect demand for housing and</p>

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					<p>business use within the Metropolitan Zones and at least 10-15min/800m-1200m walkable catchment from the edge of the Metropolitan Centre Zone and from existing and planned rapid transit stops;iii. Within and adjacent to the town centres, building heights of atleast 6 storeys and densities of urban form commensurate with the level of commercial activity and community services and at least a 5-10 min/400-800m walkable catchment from the edgeof the Town Centre Zones.(i) City centre zones and metropolitan centre zones; and(ii) any other locations, where there is with good access to:1. existing and planned rapid transit;2. edge of city centre zones and metropolitan centrezones; and/or3. areas with a range of commercialactivities and community services.(b) For any tier 1 territorial authority, identify areasfor mediumdensity residential development within any relevant residential zone.</p> <p>(c) For any other territorial authority not identified as a tier 1 territorial authority, identify areasfor greater building height and density where:</p> <p>(i) there is good access to existing and planned active and public transport to a range of commercial activities and community services; and/or</p> <p>(ii) there is relative demand for housing and business use in that location.</p>
S158.028	Chapter 4.1:	Policy 32: Identifying and	Support	Supports the amendments to Policy 32.	Retain as notified.

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	Regulatory policies	protecting key industrial-based employment locations - district plans			
S158.029	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>Supports Policy UD.3 but seeks additions to strengthen unanticipated or out of sequence developments.</p> <p>Seeks that the policy also includes the need to prioritise intensification within existing urban environments prior to considering urban expansion via greenfield development.</p>	<p>Amend Policy UD.3 as follows:</p> <p>When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:</p> <p>a) The development is not inconsistent with the Council's strategic outcomes as set out in any Future Development Strategy, or development framework / strategy that describes where and how future urban development should occur, should the Future Development Strategy not yet be released. This includes the prioritisation of intensification of existing urban areas.</p> <p>b) the location, design and layout of the proposal:</p> <p>i. contributes to establishing or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22, ii. well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors,</p> <p>ii. is well connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors and/or have access to existing or planned rapid transit stops; and / or</p> <p>iii. provides for resilience to the effects of climate change and support reductions in greenhouse gas emissions. iv. for housing will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development,</p> <p>c) The development would add significantly to meeting a demonstrated need or shortfall for housing or business floor space, as the</p>

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					<p>proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage identified in monitoring for:</p> <ul style="list-style-type: none"> i. a variety of housing that meets the regional, district, or local shortages of housing in relation to the particular type, size, or format a variety of homes that meet the needs of different households in terms of type, configuration, price, and/or location; ii. a variety of homes that enable Māori to express their cultural traditions and norms; iii. business space or land of a particular size or locational type, or iv. community, cultural, health, or educational facilities, and v. the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and <p>d) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution:</p> <ul style="list-style-type: none"> i. is of high yield relative to either the forecast demand or the identified shortfall, ii. will be realised in a timely (i.e., rapid) manner, iii. is likely to be taken up, and iv. will facilitate a net increase in district-wide up-take in the short to medium term, ii. will likely be realised in a manner earlier than the anticipated land release sequence; and /or iii. supports, and limits as much as possible adverse impacts on, the competitive operation of land and development markets. e) required development infrastructure can be provided effectively and efficiently for the proposal, and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S158.030	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	Seeks that this policy is amended to be in line with the NPS-FM and NES-F.	Amend policy to be in line with the NPS-FM and NES-F: (b) In relation to wetlands, Wellington Regional Council is responsible for managing land use within, and within a 100m setback margin of natural wetlands as directed by the NES-F 2020, as well as areas adjoining and/or upstream for the purpose of protecting wetlands
S158.031	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Supports the wording in this policy identifying urban design guidance as non-regulatory.	Retain as notified.
S158.032	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Support in part	Considers that reference to resource consents and notices of requirement is moot within this method given that the implementation within a regional or district plan would then filter through to resource consents and notices of requirement.	Amend method as follows: Method 4: Consideration - resource consents, notices of requirement and when changing, varying or reviewing plans Policies 35 to 60, IM.1, IM.2, CC.9, CC.10, CC.11, CC.12, CC.13, CC.14, FW.5, IE.2, UD.2 and UD.3 will be implemented, where relevant, when considering a resource consent, notice of requirement, or when changing, varying or reviewing a district or regional plan. AND Undertake any consequential changes as requires to reflect the amendment to the title of this method.
S158.033	Chapter 4.5: Methods to	Method CC.3: Travel demand	Oppose	Consider the method unnecessary to state within the context of the RPS.	Delete the method in its entirety.

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	implement policies (non-regulatory methods)	management plans			
S158.034	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 23: Information about natural features to protect property from natural hazards	Support	Supports the deletion of these method.	Retain as notified.
S158.035	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 25: Information about the provision of walking, cycling and public transport for development	Support	Supports the deletion of this method	Retain as notified.
S158.036	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support	Support that design guidance is stipulated as a non-statutory method. Seeks that development manuals and design guides should not be a requirement, but only implemented where considered appropriate by District Councils as non-statutory documents.	Amend the method as follows: Prepare the following development manuals and design guidance when considered appropriate by district councils as non-statutory documents: (a) Urban design guidance to provide for best practice urban design and amenity outcomes in accordance with Policy 67(a); (b) Papakāinga design guidance that are underpinned by Kaupapa which is Māori in partnership with Mana Whenua in accordance with Policy 67(f); and (c) Urban design guidance and development manuals to assist developers in meeting Policy CC.14 and Policy FW.3. Implementation: Wellington Regional Council and city and district councils (via the Wellington Regional Leadership Committee)
S158.037	Chapter 3.9:	Objective 22	Oppose in part	Objective 22 is considered a 'plan within a plan' in that the sub-points within the objective refer to climate change resilience	Amend Objective 22 as follows: Urban development, including housing and infrastructure, is

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regional form, design and function			and freshwater management, when these issues are provided within separate, more comprehensive chapters. In addition, the associated policies link climate change and freshwater management appropriately to the objective.	enabled where it demonstrates the characteristics and qualities of well- functioning urban environments, which: (a) Are compact and well designed; and (b) Provide for sufficient development capacity to meet the needs of current and future generations; and (c) Improve the overall health, well-being and quality of life of the people of the region. ;and(d) Prioritise the protection and enhancement of the quality and quantity of freshwater; and(e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and(f) Support the transition to a low emission and climate resilient region; and(g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and(h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and (i) Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and(j) Provide for commercial and industrial development in appropriate locations, including employment close to where people live; and(k) Are well connected through multi-modal (private vehicles, public transport, walking, micro-mobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space. A compact ...
S158.038	Appendix 3: Definitions	General comments - definitions	Support in part	Seeks that definitions are aligned with any relevant National Policy Statements or the National Planning Standards where applicable.	Amend definitions so that they are aligned with any relevant National Policy Statements or the National Planning Standards where applicable.

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S158.039	Appendix 3: Definitions	Carbon emissions assessment	Oppose	Seeks the deletion of this definition.	Delete the definition in its entirety.
S158.040	Appendix 3: Definitions	City centre zone	Oppose in part	Seeks that the definition is amended to reflect the centres hierarchy proposed within Policy 30, recognising Wellington City as the only City Centre within the context of the RPS.	Amend the definition as follows: Has the same meaning as in Standard 8 of the National Planning Standards: Areas used predominantly for a broad range of commercial, community, recreational and residential activities. In the context of the Wellington Region, the City Centre Zone is that of Wellington City. The zone is the main centre for the district or region.
S158.041	Appendix 3: Definitions	Regionally significant infrastructure	Oppose	Seeks that the definition is deleted to reflect the centres hierarchy proposed within Policy 30.	Delete definition in its entirety.
S158.042	Appendix 3: Definitions	Urban areas	Support in part	Seeks that the definition is amended to include open space zones.	Amend the definition as follows: The region's urban areas include residential zones, commercial, mixed use zones, open space zones and industrial zones identified in the District Plans of the Wellington Region. city, Porirua city, Lower Hutt city, Upper Hutt city, Kāpiti coast and Wairarapa combined district plans.
S158.043	General comments	General comments - overall	Support	Supports the intent of PC1, in general, seeks better clarity within the objectives and policies so that they are measureable and provide direction as to how the objectives or policy can be achieved.	Seeks better clarity within the objectives and policies so that they are measureable and provide direction as to how the objectives or policy can be achieved. Amendments sought and required across all of PC1.
S158.044	Chapter 4.2: Matters to be considered	General comments - consideration policies	Not Stated / Neutral	Considers that a number of policies have been worded within the chapter to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria).	Seek that Chapter 4.2 is deleted from the regional policy statement in full, however seeks that Policy UD.3 is retained with amendments and relocated to Chapter 4.1.
S158.045	Chapter 3.1A: Climate change	General comments - climate change	Support	Climate Change - Supports the intent to outline the key issues relating to climate change for the region and includes provisions to ensure the Plan and Council have a response in place to managing and mitigating the effects of climate change on the use and development of the environment,	Seeks that the objectives, policies and methods are re-written in some instances to provide clarity and be more directive to avoid ambiguity to District Councils and Plan users.

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S158.046	General comments	General comments - overall	Support in part	Giving effect to higher order documents - notes that PC1 includes provisions to give effect to the NPS-FM and provisions related to indigenous biodiversity, in anticipation of a new National Policy Statement on Indigenous Whistl supports this, it is noted that the NPSFM is most likely subject to change through the exposure draft and that the National Policy Statement for Indigenous Biodiversity (NPS-IB) is yet to be gazetted. Both of these higher order documents will trigger and require the GWRC to make changes to the RPS to align with these higher order documents. In some instances, PC1 seeks requirements on landowners beyond the current NPS-FM that is considered to be more onerous and restrictive.	Seeks that amendments to PC1 are made to align and does not go beyond what is required under the NPS-FM and NPS-IB (once gazetted).
S158.047	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Urban form and function - Supports PC1 giving effect to the NPS-UD however objectives and policies can be simplified.	Seeks that the related objectives and policies are simplified and are more directive and applicable to the Wellington Region.
S158.048	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	These changes are requested in line with previous submissions made on the District Council IPI's and Wellington City Council Proposed Plan to achieve regional consistency. Seeks better direction for where high density development should occur and seeks to include prescribed minimum walkable catchments.	Seeks that a defined centres hierarchy is included in line with the National Planning Standards and NPS-UD. Seek to identify Wellington City centre as the City Centre Zone of the region and that additional centres are identified as Metropolitan and Town Centres
S158.049	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Regional form, design and function Anticipated environmental results	Support in part	Consequential to the changes sought to Objective 22, seeks changes to the anticipated environmental results.	Amend anticipated environmental results as follows: 1. District plans: (a) contain policies, rules and/or other methods that encourage a range of land use activities to maintain and enhance the viability and vibrancy of Wellington City Centre, the Metropolitan Centres and the Town Centres the regionally and locally significant centres, including the regional central business district; and (b) identify and contain policies and methods to enable a range of building heights and density, including high and medium density development. (c) identify and enable urban intensification, including building heights and built form density:i. As much capacity development capacity as possible to maximise the benefits of intensification within the Wellington City Centre and within at least a 15-20 minute / 1200m-1500m walkable catchment from the edge of the City Centre Zone;ii. Building heights of at least 6 storeys and density of urban

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					form to reflect demand for housing and business use within the Metropolitan Zones and at least 15min/800m walkable catchment from the edge of the Metropolitan Centre Zone and from existing and planned rapid transit stops;iii. Within and adjacent to the town centres, building heights of at least 6 storeys and densities of urban form commensurate with the level of commercial activity and community services and at least within a 10 min/400-800m walkable catchment from the edge of the Town Centre Zones.

S16 Kāpiti Coast District Council

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S16 Kāpiti Coast District Council					
S16.001	Chapter 3.1A: Climate change	Climate change introductory text	Support	The objective appropriately balances the requirements of the NPS-FM alongside those of the NPS-UD.	<i>[Note: Submission point specifically addresses Objective A of introductory text]</i> Retain.
S16.002	Chapter 3.1A: Climate change	Climate change introductory text	Support in part		Climate change Although the chapter introduction has no statutory weight it provides a useful and up-to-date picture of the realities of the challenges facing planning for climate change and related natural hazards in the Wellington Region.
S16.003	Chapter 3.1A: Climate change	Issue 1: Greenhouse gas emissions must be reduced significantly, immediately and rapidly	Support in part	1. Greenhouse gas emissions The greenhouse gas emissions component of 3.1A is aspirational, setting out the urgent nature of behavioural change required to address greenhouse gas emissions. Council is concerned it is not able to be supported by effective RPS provisions that will achieve the desired outcomes. This is due to the fact the RPS does not and cannot directly address all the components of behavioural and technological change, or economic and political support to achieve the stated	1. Greenhouse gas emissions Amend the greenhouse gas emissions section to include a description of the tools available to address greenhouse gas emissions via the RPS, while noting the legislative limitations including: <ul style="list-style-type: none"> • Individual choice on vehicle choice; • The impact of un-planned urban development in areas that are not well-served by public transport and community services as a result of the implementation of the Medium Density Residential

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				immediate, rapid and large-scale reductions in greenhouse gas emissions. These limitations should be acknowledged.	Standards.
S16.004	Chapter 3.1A: Climate change	Issue 3: The risks associated with natural hazards are exacerbated by climate change	Support in part	3. The risks associated with natural hazards are exacerbated by climate change This section paints an unjustified negative picture of hard engineered protection works, as it implies it is inevitable they will become overwhelmed and uneconomic to sustain, which will ultimately increase the risk to communities and the environment. It is possible for river and stream protection works to be designed to withstand the predicted effects of climate change.	2. The risks associated with natural hazards are exacerbated by climate change Amend as follows: Traditional approaches to development that have not fully considered the impacts on natural systems, and our over-reliance on hard engineered protection works that have not been designed to withstand the impacts of climate change, which will inevitably become overwhelmed and uneconomic to sustain, will which is likely to ultimately increase the risk to communities and the environment.
S16.005	Chapter 3.1A: Climate change	General comments - climate change	Support in part		The chapter does not recognise the impact of un-planned urban development in areas that are not well-served by public transport and community services as a result of the implementation of the Medium Density Residential Standards. Nor does it recognise the requirement for Council to be responsive to private plan change requests that would result in a significant contribution to housing supply. We request the chapter be amended to include these challenges to achieving the objectives.
S16.006	Chapter 3.1A: Climate change	Objective CC.1	Support	The objective identifies the key challenges and components necessary to achieve a low-emission and climate resilient region.	Retain
S16.007	Chapter 3.1A: Climate change	Objective CC.2	Support	The general intent of the objective is supported.	Retain
S16.008	Chapter 3.1A: Climate change	Objective CC.3	Support	The objective sets aspirational but necessary goals to reduce net greenhouse gas emissions generated within the region, and this is supported. However, the objective only sets goals for some of the identified activities that contribute towards greenhouse gas emissions - failing to set goals for emission reductions from agriculture, stationary energy and waste. The objective is therefore incomplete and unlikely to be achieved in the absence of emission reduction goals for the other contributing activities. Council supports the policies and methods identified to achieve	Amend to include emission reduction goals for all of the contributing activities identified in the objective.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				Objective CC.3 with GWRC taking a lead role consistent with its RMA section 30 functions. Council also supports the non-regulatory methods identified for city and district councils that will support GWRC in achieving the objective.	
S16.009	Chapter 3.1A: Climate change	Objective CC.4	Support in part	Council does not oppose the objective on the condition any regulatory methods to achieve the objective are not the responsibility of city and district councils. Council also notes that apart from the provision of natural defences against coastal hazards under Policy 26 of the NZCPS, the concept of nature-based solutions is not supported by the RMA or higher-level statutory planning document, making regulatory methods more difficult to justify under section 32 of the RMA.	Ensure all regulatory methods (apart from those that are consistent with and give effect to the NZCPS) proposed to achieve Objective CC.4 do not apply to city and district councils
S16.010	Chapter 3.1A: Climate change	Objective CC.5	Support in part	Council opposes the implementation of the regional forest spatial plan being the responsibility of city and district councils. GWRC has the ability to impose methods under section 30 of the RMA to achieve the objective via regional plan rules.	Delete city and district councils from having responsibility for the implementation of Objective regional forest spatial plan that is identified as a method to achieve Objective CC.5.
S16.011	Chapter 3.1A: Climate change	Objective CC.6	Support	Council supports the intent of the objective that management and adaptation planning increase the resilience of communities and the natural environment to the short, medium, and long-term effects of climate change.	Retain
S16.012	Chapter 3.1A: Climate change	Objective CC.7	Support	Council supports the intent of the objective to improve climate change understanding and encourage participation of people and businesses in planning and implementing mitigation and adaptation responses. Council also supports the non-regulatory approach proposed to achieve it.	Retain
S16.013	Chapter 3.1A: Climate change	Objective CC.8	Support in part	Council supports the objective of iwi and hapū empowerment to achieve climate resilience in their communities, however it is unclear how hapū empowerment is anticipated to be achieved under existing iwi participation and representation agreements between councils and iwi authorities who currently represent hapū in the Kapiti Coast District. This suggested shift away from iwi authorities who represent hapū will result in resourcing challenges for Council in how it works in partnership with Iwi in Kāpiti, and may result in uncertainty between hapū and iwi authorities in who has mandate during Resource Management Act processes.	<i>[Note: two options considered]</i> Either: 1. Delete the reference to hapū from Objective CC.8; or 2. Include a policy that outlines how the relationship between hapū and iwi authorities will work in a practical sense during RMA processes.
S16.014	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with	Oppose	It is unclear to us what the policy would expect city and district councils to do through their district plans. Considering city and district councils have no responsibilities for discharges to air, and regional councils are responsible for public transport services, we find the policy confusing and without a legislative basis on which to base it on. As a mandatory policy that city	Delete Policy CC.1 or apply it only to regional councils.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		transport infrastructure - district and regional plans		and district councils would be required to give effect to, this is particularly concerning.	
S16.015	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>We oppose this policy and consider a non-regulatory method appropriate for encouragement of the desired outcomes.</p> <p>We consider it inappropriate to require city and district councils to develop threshold targets. Traffic volumes and decisions by individuals on whether or not to use a private vehicle, buy an electric vehicle, or use public transport are not matters that can be addressed or required via regulatory methods in a district plan. Council already requires transport assessments on developments where it is considered to be appropriate, and this often includes travel plans to address transport effects where specific transport concerns are identified. As city and district councils have no legal authority under the RMA to manage discharges to air, travel assessments are required for safety purposes rather than emissions purposes.</p> <p>We also oppose the suggested requirement for a formal plan change to give effect to this policy by June 2025. We recommend deleting policy or amending it to provide for non-regulatory methods to encourage the desired changes in travel mode.</p>	Delete policy CC.2 or amend it to require non-regulatory methods that will be explored by Greater Wellington Regional Council and city and district councils in partnership.
S16.016	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Oppose	<p>Council opposes this policy on the basis it is unclear how district plans would enable a shift to low and zero-carbon emission transport. Council notes district plans do not contain provisions that specify what transportation or infrastructure types must be adopted, nor do they include provisions that would prevent a shift to low and zero-carbon emission transport.</p> <p>Council considers non-district plan methods would be more efficient and effective at achieving the stated objective, such as GWRC input into Council strategies and plans prepared under the Local Government Act that manage infrastructure such as roads and public spaces. The section 32 does not appear to explore these options. GWRC could also influence the funding and timing of the delivery of projects that may help achieve the stated objective via the Long Term Plan and Annual Plan processes. We consider if such an approach had been carefully considered in the section</p>	Delete or amend to clearly specify how district plans could enable the desired shift to low and zero-carbon emission transport.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>32 evaluation report, Policy CC.3 would not have been included in the plan change.</p> <p>As a proposed mandatory policy that city and district councils would be required to give effect to, this policy is particularly concerning to Council.</p>	
S16.017	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	This policy is unnecessary as it merely summarises other policies proposed by RPS Change 1. It also links with Policy CC.14 which we strongly oppose and seek its deletion in our submission below	Delete Policy CC.4.
S16.018	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	We support the policy on the basis it is delivering on a legislative requirement GWRC is responsible for, and no unjustified requirements are proposed for city and district councils.	Retain.
S16.019	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	We support the intent of the policy but request it is carefully checked to ensure it does not unnecessarily duplicate NPS-PF requirements. We request the implementation of this policy remains the responsibility of GWRC only.	Retain
S16.020	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate	Oppose	<p>Council considers the nature-based approach does not fall under sections 30 or 31 of the RMA as it goes beyond the maintenance of indigenous biodiversity. Council notes the closest relevant legislative or statutory planning document reference is Policy 26 that provides for natural defenses against coastal hazards. Policy CC.7 proposes to go far beyond this.</p> <p>More fundamentally, we are unaware of any evidence that a genuine resource management issue exists, or if it does, that a regulatory method would be the most appropriate method to address it when compared to other reasonably practicable</p>	Delete Policy CC.7 entirely and investigate potential non-regulatory methods.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		change - district and regional plans		<p>methods available.</p> <p>As the proposed approach does not appear to be required by the Act or any higher level statutory planning document, it is particularly concerning to Council that the mandatory application of the policy is proposed and that the district plan would be required to give effect to it.</p> <p>Overall, we consider the suggested requirement for district plans to require objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, cannot be justified under section 32 of the RMA.</p>	
S16.021	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	<p>The suggestion that district plans include methods to prioritise reducing greenhouse gas emissions rather than offsetting is not supported by the RMA. City and district councils do not have any functions under the RMA to manage greenhouse gas emissions or apply greenhouse gas offsetting.</p> <p>It is unclear to us why GWRC would consider it appropriate to apply a mandatory policy that district plans would be required to give effect to when there is no lawful ability to do so. The statutory underpinning for this policy (and many other policies in the plan change) do not appear to have been explored or evaluated fully in the section 32 evaluation.</p> <p>It appears to Council that GWRC have not explored the range of regulatory methods available to GWRC under section 30 of the RMA that it could put in place via its regional plan(s).</p>	Delete Policy CC.8.
S16.022	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Oppose	<p>We note district plans and decisions under them have no ability to have particular regard to whether subdivision, use and development have been planned to optimise overall transport demand, or maximise mode shift from private vehicles to public transport or active modes in a way that contributes to reducing greenhouse gas emissions. We are confused as to why GWRC would consider this an appropriate policy compared to other more effective and appropriate methods to achieve the desired greenhouse gas emission reductions. We do not consider the RPS or district plans to be effective or appropriate resource management tools to achieve the stated goals.</p> <p>Council also notes the policy suffers from the same contradiction as other consideration policies, where the policy wording also requires particular regard to be had. These verbs have very different meanings under the RMA.</p>	Delete Policy CC.9 or alter its applicability so it is only relevant to regional plans and decisions under regional plans.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S16.023	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	<p>The intent of the policy to provide regional direction on the consideration of new freight distribution centres is useful and Council supports this.</p> <p>Council notes the policy suffers from the same contradiction as other consideration policies, where the policy wording also requires particular regard to be had. These verbs have very different meanings under the RMA. We request an amendment to address this.</p>	<p>Amend Policy CC.10 as follows: Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan for freight distribution centres and new industrial areas or similar activities with significant freight servicing requirements, particular regard consideration shall be given to the proximity of efficient transport networks and locations that will contribute to efficient freight movements and minimising associated greenhouse gas emissions.</p>
S16.024	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose	<p>Council opposes Policy CC.11 in its entirety on the basis it will simply add unnecessary cost to transport infrastructure applications without any real-world benefits in the form of greenhouse gas reductions.</p> <p>As an example, a notice of requirement or resource consent application for a new road is unlikely to present any practicable options to reduce transport-related greenhouse gas emissions. Council notes greenhouse gas emissions come from the vehicles using the transport network rather than from the transportation infrastructure. Decisions on resource consents, resource consents, and district plans cannot determine the greenhouse gas emissions of the vehicles that will use the transport infrastructure. Council appreciates this policy may be more applicable to regional council functions with respect to the provisions of public transport infrastructure, and on this basis, amendments are requested to ensure the policy relevant only to regional council plans and decisions.</p>	Amend Policy CC.11 so it only applies to regional plans and other relevant regional council functions and decisions.
S16.025	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	<p>If the identification of specific nature-based solutions is an exercise GWRC wishes to undertake, whilst Council does not oppose its concept, Council notes it is not supported by the RMA or any higher-level statutory planning document. Council requests the policy is either deleted entirely or amended so it is only applicable to regional councils. Council does not consider the approach can be justified under section 32 for inclusion in a district plan.</p>	Delete Policy CC.12 entirely or amend so it is only applicable to regional councils.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S16.026	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	We note the policy lacks certainty on whether it applies only to regional councils or also city and district councils. We request the policy is amended so it is clear it only applies to regional councils as city and district councils have no statutory functions or powers to manage discharges to air.	Amend Policy CC.13 so it only applies to regional councils.
S16.027	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	<p>With the exceptions of the principles of water sensitive urban design and the requirement for capturing and storing rainwater via rainwater tanks, the policy demonstrates a lack of understanding of district planning, urban planning processes and procedures, and the limits of regulatory intervention in a district plan in the absence of legislative mandate.</p> <p>Council considers the policy should be deleted in favour of non-regulatory methods that would encourage and incentivise the desired outcomes including:</p> <ul style="list-style-type: none"> • Enhancing, maintaining and creating urban greening to provide urban cooling. • A suburb-scale tree canopy cover target of 10% by 2030 and 30% cover by 2050. • Restoration and enhancement of natural ecosystems. • Efficient use of energy and water in buildings and infrastructure. • Buildings infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind. <p>The drafting of RPS Change 1 does not suitably account for the limitations that legislation creates on district plans, and on resource consent decision-making by city and district councils. Had the section 32 evaluation considered this policy and the suggested tasks in detail it would have identified that:</p> <ul style="list-style-type: none"> • The resilience of buildings is a matter addressed by the Building Act and its associated regulations. • District plans do not prevent water and energy efficient design of buildings. Therefore, it is unclear why district plans would need to be changed to provide for them. • The enhancement and restoration of natural ecosystems are not activities that can be required under a district plan. District 	Delete Policy CC.14. Investigate the use of non-regulatory methods to achieve the stated goals outside of the RPS.

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				and city council functions under the RMA require the maintenance of indigenous biodiversity. Therefore, restoration and enhancement of the natural ecosystems is best achieved via non-regulatory incentives and support. • Tree coverage targets for suburban areas to provide urban cooling conflicts with development enabled by the MDRS. It is also unclear how a district plan could require contributions of tree planting in urban areas to achieve the stated targets, which Council notes has no statutory basis or convincing evidence base to support them. The use of non-regulatory methods should be the option pursued by GWRC, working in partnership with city and district councils rather attempting regulatory methods that are not supported by legislation.	
S16.028	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support	We support reference to dynamic adaptive planning pathways or similar adaptive planning approaches, and the other matters listed in the policy.	Retain
S16.029	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	Although Council supports the general intent of the policy, it is noted the terms consideration and particular regard shall be given requires decision makers to carry out two different actions. These terms have different meanings. Councils considers it is not appropriate to have a policy titled with consideration, when the policy itself requires decision makers to have particular regard to the matters listed in the policy. Council requests this is amended to align with how the RPS describes district plan requirements for RPS policies that must be considered by city and district councils.	Amend as follows: Policy IM.1: Integrated management - ki uta ki tai - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan consideration particular regard shall be given to: (a) ...
S16.030	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Oppose	The policy is not supported by any provisions of the RMA or higher-level statutory planning document. Council is also concerned that the proposed policy contradicts itself by stating it is a policy that must be considered, but then requires decision makers to have particular regard to all objectives and policies in the RPS - many of which must be given effect to, while others are only to be considered.	Delete Policy IM.2.
S16.031	Chapter 4.1:	Policy 2: Reducing adverse	Support	Council supports the consideration of the adverse effects of discharges to air in an integrated way with GWRC responsible for the regulatory method of regional plan implementation.	Retain.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regulatory policies	effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans		<p>Council considers this is consistent with GWRC's responsibilities under section 30 of the RMA.</p> <p>Council supports the identified city and district council methods and participation, in particular the provision of information and the establishment of protocols for the management of earthworks and air quality between local authorities - however Council notes there is no requirement for the specification of non-regulatory methods in an RPS.</p>	
S16.032	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support	We consider the proposed amendments will result in the policy being more consistent with the requirements of the NZCPS.	Retain.
S16.033	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	<p>This policy is generally consistent with the Operative Kapiti Coast District Plan 2021. Council agrees recognition of the benefits of renewable energy and regionally significant infrastructure is an appropriate directive, however placing emphasis on low or zero energy, and low and zero carbon regionally significant infrastructure is not supported by the RMA or higher-level statutory planning document.</p> <p>Council has concerns with the suggested shift in emphasis due to the potential implications for our wastewater and potable water infrastructure (which are identified as regionally significant infrastructure). The suggested shift in emphasis in Policy 7 is unjustified and may have a negative impact on the Council's future consent applications for new or upgraded infrastructure.</p>	<p>Amend as follows: District and regional plans shall include policies and/or methods that recognise: a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular including low and zero carbon regionally significant infrastructure including: Explanation Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits both within and outside the region, in particular if regionally significant infrastructure is a low or zero carbon development.</p>
S16.034	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas	Support	Council supports GWRC taking responsibility for actions under this policy as they align with GWRC's functions under section 30 of the RMA. Council requests responsibility for the implementation of this policy remains with GWRC.	Retain

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		emission reduction and uptake of low emission fuels - Regional Land Transport Plan			
S16.035	Chapter 4.1: Regulatory policies	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support	Council supports the deletion of this policy as a district plan cannot influence the use and consumption of non-renewable transport fuel, or carbon dioxide emissions from transportation.	Retain deletion of Policy 10.
S16.036	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	<p>Council supports the support for small scale energy generation provisions within district plans that give effect to the NPS-REG 2011.</p> <p>However, when it comes promoting and enabling energy efficient design it is unclear how a district plan would promote and enable this. Council notes district plans do not prevent these activities from being carried out, and the energy efficiency of buildings is a market-led decision that cannot be regulated via a district plan under existing legislation.</p> <p>All buildings are required to meet district plan bulk and location requirements to manage adverse effects on the environment, regardless of whether they are energy efficient or not. Council considers non-regulatory methods such as design guidance and education would be more efficient and effective at meeting the objectives.</p> <p>Council also notes provisions in a district plan should only be included if including them can be proven to be the most efficient and effective method to achieve a particular objective. If it is not the most efficient and effective method, then the provision should not be in a district plan. Council notes the section 32 evaluation does not explore other options to</p>	Delete district plan requirement to include the promotion and enablement of energy efficient design. Insert non-regulatory methods to promote energy efficient design.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>achieve the relevant objective in detail.</p> <p>Council also notes it is a common misconception that a district plan controls all aspects of the use and development of the environment. However, this is not the case due to free-market factors and the decisions of individuals that a district plan cannot control or influence - such as the energy efficiency design of buildings or the type of vehicle and its emissions that individuals choose to purchase. We request amendments to remove all provisions that fit into this category.</p>	
S16.037	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support	Council notes the amendments to the policy give effect to the NPS- FM.	Retain
S16.038	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	Although Council supports the general intent of this policy, the use of the term particular regard shall be given within a consideration policy is not supported. An amendment to correct this inconsistency is requested.	Amend Policy 39 as follows: Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard consideration shall be given to: (a) ...
S16.039	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	<p>Regarding clause (b), it is unclear what the criteria would be for determining whether options being considered are a more appropriate or suitably innovative solution. How will the suitability of potential innovative solutions be determined? Who will determine whether an option is more appropriate or suitably innovative under this clause? Council requests amendments to eliminate this uncertainty.</p> <p>We request the use of verbs in the policy is consistent. As a consideration policy it is not appropriate for decision makers to have particular regard to the policy. These terms have different meanings in RMA decision making. We request this inconsistency is addressed.</p>	Amend Policy 52 as follows: Policy 52: Minimising adverse effects of hazard mitigation measures - consideration (a) ... (b) whether non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options would provide a more appropriate or suitably innovative solution the same or a greater degree of hazard mitigation; (c) ... Explanation Policy 52 recognises that the effects of hard protection structures can have adverse effects on the environment,

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					increase the risks from natural hazards over time and transfer the risks to nearby areas. It provides direction to consider lower impact methods of hazard mitigation such as non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options, that may be as effective at hazard mitigation as structural protection works or hard engineering methods more appropriate providing they can suitably mitigate the hazard.
S16.040	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	<p>Whilst Council supports the intent of the policy, noting direction on the consideration of appropriate urban expansion in the RPS is required by the NPS-UD. However, Council has concerns regarding the specific drafting set out below.</p> <ol style="list-style-type: none"> 1. Consideration versus having particular regard. These verbs have different meanings, and we request the use of these verbs is consistent to present clear direction on the application of the policy to decision makers. Council request the verb chosen for this policy gives effect to the NPS-UD, that being particular regard being given. 2. Clause (a)(ii)1 directs applying the direction of avoidance of inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29. We note RPS change 1 proposes changes to Policy 29 that conflict with this. Council supports the avoidance of inappropriate subdivision, use and development in areas at risk from significant natural hazards, whilst mitigation should be the focus for areas subject to less risk. 3. As the policy is to assist in the consideration of potential areas for urban expansion, Council considers it is necessary for the criteria to include the consideration of housing need in the relevant area. This should refer to the latest HBA findings but should also refer to the impacts of the implementation of the MDRS across all urban areas where the impact of this on housing capacity is known. Council notes there is no support for urban expansion in under the NPS-UD where there is no evidence demonstrating the need for additional urban land to meet housing needs. 	<p>Amend Policy 55 as follows: Policy 55: Providing for appropriate urban expansion - consideration When considering an application for a resource consent, or a plan change, variation or review of a district plan for urban development beyond the region's urban areas (as at August 2022) that would provide for significant development capacity, that is not otherwise enabled in the district plan or is not in sequence with planned land release, particular regard shall be given to whether:</p> <ol style="list-style-type: none"> a) the urban-proposed urban development contributes to establishing or maintaining the qualities of a well- functioning urban environment, including: <ol style="list-style-type: none"> i the urban development will be well-connected to the existing or planned urban area and infrastructure, particularly if it is located along existing or planned transport corridors; ii the location, design and layout of the proposed development shall apply incorporates the specific management or protection for values or resources identified by this RPS, including: <ol style="list-style-type: none"> 1. Avoiding inappropriate subdivision, use and development in areas at risk from significant natural hazards and the mitigation of other natural hazards as required by Policy 29;

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				<p>4. Council considers reverse sensitivity effects on existing lawfully established activities needs to be included. This is not limited to the consideration of protecting regionally significant infrastructure.</p> <p>5. Clause (b) is too broad and needs to be amended to be specific to a relevant Future Development Strategy for the area, and in the absence of one it needs to refer to those growth strategies that have been prepared appropriately and are supported by a robust evidence base. It is also important that such growth strategies have been prepared in accordance with the consultation requirements of the Local Government Act. Council notes the WRGF does not meet any of these requirements. Council has addressed concerns with the proposed inclusion of the WRGF in the RPS elsewhere in this submission, but Council also requests amendments to this clause to ensure it is fit for purpose and does not unduly prejudice local decision making and community aspirations for future urban growth.</p> <p>6. Clause (c) needs to be specific on the status of a structure plan and who has prepared it. As currently worded, anyone could prepare a structure plan for a proposed area for urban expansion and it would have weight under the policy. Council considers a structure plan under the policy needs to be prepared either in consultation with the relevant city or district council, or by the relevant city or district council in consultation with the regional council and other relevant stakeholders including iwi.</p> <p>7. Clause (d) - We note this is not consistent with NPS-UD Policy 8 as it refers to any urban development rather than plan changes. This has the effect of undermining or significantly reducing the importance of the other matters outlined in the policy. Council considers the policy needs to present a holistic list of matters that need to be applied when considering new areas for urban expansion via plan changes. The NPS-UD requirements mean the consideration of areas for potential urban expansion needs to consider other important factors such as the ability and timing of the availability of infrastructure, and the need for housing in particular locations. Clause (d) undermines a holistic approach to this consideration process, and we request it be deleted and replaced with wording in the beginning of the policy that aligns with the requirements of Policy 8 of the NPS-UD.</p>	<p>2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23;;</p> <p>3. Protecting outstanding natural features and landscape values as identified by Policy 25;</p> <p>4. Protecting historic heritage values as identified by Policy 22;;</p> <p>5. Integrating Te Mana o Te Wai consistent with Policy 42;</p> <p>6. Providing for climate resilience and supporting a low or zero carbon contributing towards an efficient transport network consistent with Policies CC.1, CC.4, CC.10 and CC17;;</p> <p>7. Recognising and providing for values of significance to mana whenua / tangata whenua;</p> <p>8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and</p> <p>b) the urban development is consistent with any a published Future Development Strategy, or the city or district Council's regional or local strategic growth strategy or plan and/or development framework or strategy that describes where and how future urban development should occur in that district or region, should the a Future Development Strategy be yet to be released published; and</p> <p>c) a structure plan has been prepared in consultation with the relevant city or district council, or by the relevant city or district council in consultation with the regional council, iwi and other relevant stakeholders; and/or</p> <p>d) Any urban development that would provide for significant development capacity, regardless of if the development was out of sequence or unanticipated by growth or development strategies.</p> <p>d) The proposed development will provide housing in a part of the</p>

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				<p>8. Explanation - Council consider explanations should not accompany policies as they have no legal status under the RMA, but can often attempt to make up for poor policy drafting by including information that should be included in the policy itself. Council notes the explanation contains inaccuracies including attempting to give legal weight to the WRGF. As pointed out elsewhere in this submission, the WRGF was not prepared in accordance with the principles of consultation under the Local Government Act and it has no legal status under the RMA. Council requests the explanation be deleted entirely.</p> <p>9. Council is surprised not to see reference to natural wetlands in the policy. If this is an oversight, we request this be corrected.</p> <p>10. Council notes the requirements of the NZCPS regarding development that affects coastal natural character is not referred to. If this is an oversight, Council request the policy is amended to include relevant consideration of the NZCPS requirements.</p>	<p>city or district that is identified in the latest Housing and Business Capacity Assessment as having a shortfall in plan-enabled housing capacity; ande) The proposed development will not result in reverse sensitivity effects on lawfully established activities or activities provided for in the district plan on adjacent land.Explanation Policy 55 gives direction to the matters that must be considered in any proposal that will result in urban development occurring beyond the region's existing urban areas. This includes ensuring that the qualities and characteristics of a well-functioning urban environment are provided for through clause (a), which includes recognising values or resources identified elsewhere in the RPS. Clause (d) requires consideration of any proposal that would add significantly to development capacity, regardless of whether it is out of sequence or unanticipated by growth or development strategies. This clause gives effect to Policy 8 of the National Policy Statement on Urban Development. Clause (d) should be considered in conjunction with Policy UD.3. Clause (b) requires consideration to be given to the consistency of the development with the Future Development Strategy which will look to deliver well-functioning urban environments through a regional spatial plan. To provide for the interim period where the Future Development Strategy is in development, clause (b) also requires consideration to be given to the consistency with any regional strategic growth and/or development framework which is currently the Wellington Regional Growth Framework. Clause (c) requires consideration to be given to whether a structure plan has been provided. A structure plan is a framework to guide the development or redevelopment of an area by defining the future development and land use patterns, areas of open space, the layout and</p>

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					nature of infrastructure (including transportation links), and other key features and constraints that influence how the effects of development are to be managed.
S16.041	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Oppose	<p>Council notes the policy attempts to place legal weight on the WRGF under the RMA, which Council has expressed opposition to elsewhere in this submission. This is opposed and deletion to the WRGF is sought from Policy 56.</p> <p>Council also notes the policy duplicates one of the many matters addressed in Policy 55. This is unnecessary and creates policy overlap and the potential for conflict between the policies. Council seeks amendments to address these concerns. Council's requested amendments will ensure that in the case of proposed new urban development the matters contained in Policy 55 will be addressed.</p>	<p>Amend Policy 56 as follows:</p> <p>d) in the case of proposed new urban development, the proposal is consistent with Policy 55 any Future Development Strategy, or the city or district regional or local strategic growth and/or development framework or strategy that addresses future rural development, should the Future Development Strategy be yet to be released; or (e) in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity. Explanation Policy 56 recognises the tension that exists between urban and rural development on the fringe of urban areas and seeks to manage this tension such that well-functioning urban environments and urban areas are established and maintained.</p>
S16.042	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support in part	<p>Although Council supports the principle of improved alignment between resource management decisions and the Regional Land Transport Plan, it is unclear how this would be delivered through the policy particularly as the explanation supporting the policy appears to conflict with the policy itself. The explanation states the policy is relevant to the consideration of proposals that affect land transport outcomes. We note the policy requires more than this and does not contain any thresholds for when the policy would need to be applied or given effect to in district plans.</p>	<p>Delete Policy 57 or amend so it: 1. applies only to the consideration of proposals that affect land transport outcomes (that are within the powers of city and district councils); and 2. Provides clear thresholds for when the policy would need to be applied or given effect to in district plans (limited to the powers city and district councils have).</p>
S16.043	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use	Support in part	<p>Council supports the inclusion of clause (a) that requires new urban development to be carried out in a way that requires the development, funding, implantation and operation of infrastructure is provided for.</p>	<p>Amend Policy 58 as follows: (b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is</p>

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	be considered	with development and operation of infrastructure - consideration		However, Council notes that decisions on resource consents and changes, variations or reviews of district plans cannot require that low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring. Council therefore opposes clause (b) and seek it be deleted.	available, or is consented, designated or programmed to be available prior to development occurring.
S16.044	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Council supports the sharing of responsibilities with GWRC on information provision on the topics identified via non-district plan methods.	Retain
S16.045	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Council supports GWRC's intent expressed in the policy on the condition implementing the policy via regulatory methods remains the responsibility of GWRC only.	Retain.
S16.046	Chapter 3.4: Fresh water (including public access)	Objective 12	Support	<p>Council considers the objective appropriately gives effect to the requirements of the NPS-FM with respect to the expression of Te Mana o te Wai.</p> <p>Council looks forward to seeing the yet to be drafted expressions of Te Mana o te Wai from those iwi who hold mana whenua within the Kāpiti Coast District.</p> <p>Council notes and supports clause (d) of the Te Mana o te Wai principles that makes it clear under the principle of Governance that it requires those with authority for making decisions about freshwater do so in a way that prioritises the health and well-being of freshwater now and into the future.</p>	Retain

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S16.047	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support	Council agrees the management of waterbodies, other than activities carried out on their surface, is a role best filled by GWRC as it has the expertise and clear management responsibility under the RMA for the maintenance and enhancement of the quality of water, the maintenance of the quantity of water in waterbodies, the maintenance and enhancement of ecosystems in water bodies, the control of the taking, use, damming and diversion of water, and the control of discharges of contaminants into water.	Retain
S16.048	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Council notes the management of all the listed actions in the policy fall under the statutory functions of regional councils under the RMA. This being the case GWRC can include regulatory methods in its regional plan(s) to require and manage these actions. This could be achieved via making amendments to relevant PNRP rules to give effect to the NPS-FM and NPS-UD such as Rule R50: Stormwater from new subdivision and development. Council requests the actions that are directly relevant to urban development and subdivision design are developed by GWRC in collaboration with the technical experts of the city and district councils in the region. Council notes clause (k) of the policy implies that stormwater systems generate contaminants, however this is not the case. Stormwater systems transport contaminants and it is important this distinction is made clear. Council also notes stormwater systems transport contaminants from many sources that are beyond the control of city and district councils who own stormwater infrastructure - such as contaminants from vehicles using roads, private carparks, and any unlawful discharges made by persons to the stormwater network via stormwater grates in roads etc. Whilst Council supports the inclusion of to the extent practicable in the policy, we consider clause (k) is founded on a misconception of how stormwater networks function, and with who responsibility for contaminants within stormwater sits.	Amend as follows: (k) Require stormwater quality management that will minimise the generation-transportation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater; and
S16.049	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	It is Council's understanding the justification GWRC is using to base the proposal to require city and district councils to carry out water quality and aquatic ecosystem health functions is the reference in section 31 of the RMA to the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources. This clause does not give city and district councils the power to manage waterbodies and aquatic ecosystem health. Council also notes references in the NPS-FM that could be	Amend Policy 15 to remove the requirement for district plans to manage earthworks and vegetation disturbance to the extent necessary to achieve the target attribute states. Amend Policy 15 to specify and support district plan provisions that have positive impacts on freshwater such as: 1. setbacks for vegetation disturbance and earthworks from water bodies. 2. Earthworks sediment management. 3. Subdivision layout and design. 4. Attenuation and hydraulic neutrality.

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				<p>interpreted to be requiring city and district councils to carry out freshwater management responsibilities, however this is not Council's reading of the NPS-FM.</p> <p>If it is the intent of the NPS-FM to transfer freshwater management responsibilities to city and district councils, and Council does not consider it is, then the RPS needs to be very specific on the responsibilities proposed for city and district councils to achieve this - and such activities and responsibilities must fall within the functions and technical capabilities of city and district councils. City and district councils have no technical expertise on the management of water quality or ecosystem health, and therefore we would expect the section 32 evaluation to identify and explore this issue with respect to the alternative methods that may be the most appropriate, effective and efficient method to achieve the relevant objectives. The section 32 evaluation does not do this.</p> <p>Although Council agrees there are functions city and district councils have in section 31 for the management of activities that can result in adverse effects on water such as earthworks and vegetation removal, we do not agree city and district councils can include regulatory methods in a district plan managing these activities to achieve the target attributes. Council notes the guidance on this matter released by the Ministry for the Environment for territorial local authorities does not support the approach taken by Policy 15 as follows:</p> <p>The NPS-FM 2020 does not provide specific directions about what approaches territorial authorities should use to manage the effects of land use and development on freshwater in district plans. The approach provides flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district¹.</p> <p>Council would support the inclusion of provisions in the RPS that support and provide statutory weight for district plan provisions that manage earthworks and vegetation removal that may affect water, but we do not support the requirement for district plans to include water quality provisions that would need city and district councils to have regional council expertise, and regional council functions under section 30 of the RMA.</p> <p>Finally, Council notes all the requirements of policy 15 are</p>	

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				covered by regional council functions under section 30 of the RMA, meaning GWRC is able to include provisions managing these activities and the effects of these activities in their regional plan(s).	
S16.050	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Council supports the proposed amendments to the policy. We consider the proposed amendments are consistent with regional council functions under section 30 of the RMA and give effect to the NPS-FM.	Retain
S16.051	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Council supports the policy and the matters to be considered by the regional council for regional consents. We note the matters align with the functions of regional councils and appropriately address the NPS- FM matters that fall within the jurisdiction, resourcing, skills and role of regional councils under the RMA and NPS-FM.	Retain.
S16.052	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Council supports the proposed deletion of the references to notices of requirement and variations or reviews of district plans, however we note the policy explanation still implies that city and district council resource consent decisions must also consider the policy. We consider it would not be appropriate for city and district councils to consider the policy in their decision-making functions under the RMA as they have no functions to control activities to achieve target attribute states or discharges to water. Notwithstanding the fact explanatory text to policies have no legal weight under the RMA, we request amendments to clarify that the policy applies only to regional councils.	Amend Policy 41 as follows: Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration When considering an application for a regional resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by; (a) considering whether the activity will achieve environmental outcomes and target attribute states; and (b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met. Explanation An area of overlapping jurisdiction between Wellington Regional Council and district and city councils is the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on

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					erosion prone land in rural areas and many small scale earthworks in urban areas – such as driveways and retaining walls – can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to minimise erosion and silt and sedimentation effects associated with these activities.
S16.053	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Council supports the applicability of the policy to regional consents only and request this is not changed to include city and district councils.	Retain
S16.054	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support	<p>Council notes the actions identified for regional plans to reduce water demand are necessary to give effect to the NPS-FM, although it is unclear how regional plans will be able to address all the matters via regulatory methods such as addressing public and private water losses from leaks.</p> <p>Council recommends GWRC works in collaboration with city and district councils to identify and implement the actions that would be necessary to achieve the relevant objective(s) - noting the most efficient and effective methods for some of the actions are likely to be non-regulatory or non-RMA regulatory methods.</p>	<p>Amend as follows:</p> <p>Policy FW.1: Reducing water demand - regional plans Greater Wellington Regional Council will work with city and district councils to investigate, identify and implement the most appropriate methods to reduce water demand. This may include non- regulatory or alternative methods. Regional plans shall may include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including:</p> <p>(a) ...</p>
S16.055	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	<p>Council supports the requirement for district plans to include provisions requiring alternative water supplies for non-potable use in new developments. The Operative Kapiti Coast District Plan 2021 includes such provisions for new residential units.</p> <p>Council does not support the requirement for district plans to include provisions to improve the efficiency of the end use of water on a per capita basis for new developments. We have some experience in district plan provisions that attempt to</p>	<p>Amend Policy FW.2 as follows:</p> <p>Policy FW.2: Reducing water demand - district plans District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable: (a) provisions improving the efficiency of the end use of water on a per capita basis for new developments; and (b) provisions requiring alternate water supplies for non-</p>

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				achieve this (See Appendix 3.1 of the Operative Kapiti Coast District Plan 2021 - Development Incentives). We can advise that such provisions are ineffective and cannot be enforced due to the ability for water end-use systems or technology to be easily exchanged for non-efficient systems or technology e.g. water efficient appliances, toilets, shower heads etc. There is no way to monitor or enforce such provisions. Council has found the most effective method to significantly reduce water demand is the installation of water meters combined with education initiatives including the provision of free advice on how ratepayers can reduce water use. These are not methods under the RMA.	potable use in new developments such as the requirement to install rainwater tanks.
S16.056	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	<p>Council considers the matters in the policy are important considerations, particularly where new urban development is proposed.</p> <p>We request the use of the verb consideration in the policy heading is transferred into the policy wording to avoid inconsistency with the structure of the RPS and the consideration focus of the policy.</p>	<p>Amend Policy FW.5 as follows: Policy FW.5: Water supply planning for climate change and urban development - consideration When considering a change, variation or review of a regional or district plan particular regard consideration shall be given to: (a) ... Explanation Policy FW.5 requires water supply planning to adequately considered including consider the impacts of climate change and new urban development.</p>
S16.057	Chapter 3.6: Indigenous ecosystems	Objective 16	Support in part	<p>Although Council supports the general intent of the objective, some elements are opposed.</p> <p>Council opposes the use of regulatory methods to require city and district councils to achieve restoration and enhancement of biodiversity values - it is only "maintenance" of indigenous biodiversity that is provided for under the RMA.</p> <p>Council also notes the use of and / or implies a choice can be made. This is an issue across RPS Change 1 where it appears GRWC is unsure whether there should be a choice or not. We request all instances of 'and / or' are reviewed and 'and' or 'or' are specifically used where appropriate.</p>	Ensure all regulatory methods proposed to require enhancement and restoration are not the responsibility of city and district councils. All instances of 'and / or' are reviewed and 'and' or 'or' are specifically used where appropriate.
S16.059	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support	The intent of the objective is supported.	Retain

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S16.060	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support in part	Council requests the objective refer to mana whenua values rather than tangata whenua values. The practical application of seeking to identify tangata whenua values of those who are not represented by the relevant mana whenua iwi authorities would be an impossible task for city and district councils. Council requests the use of the terms mana whenua/tangata whenua/iwi/hapū and Māori are carefully considered and applied appropriately throughout RPS Change 1 with respect to the practical implications for resource management processes and the requirements of the RMA and relevant higher level statutory planning documents.	Amend Objective 16B by deleting reference to tangata whenua as follows: Objective 16B Mana whenua / tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making, and mana whenua / tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity.
S16.061	Chapter 3.6: Indigenous ecosystems	Objective 16C	Support	Council supports the recognition of the steward role that landowners and communities play in maintaining, enhancing and restoring indigenous biodiversity.	Retain
S16.062	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Oppose	Although the principle of the policy is not opposed, Council notes the proposed policy is not supported by any legislative requirements under the RMA or higher level statutory planning processes, yet it imposes significant additional costs on city and district councils though requiring changes to district plans to give effect to it. This makes it difficult to justify under section 32 of the RMA. Council notes it is a common theme within the plan change that the draft NPS-IB is proposed to be implemented in the RPS despite the NPS-IB not being in force or in its final form - and therefore the NPS- IB lacks any legal weight under the RMA.	Delete Policy IE.1.
S16.063	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose	As this policy is not required by the RMA or a higher-level statutory planning document Council requests the methods and implementation of those methods should be the responsibility of GWRC only.	Delete Policy IE.2 or amend so it is only applicable to the regional council.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S16.064	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	Council notes city and district councils are responsible for the maintenance of indigenous biodiversity but have no role under the RMA or higher-legal statutory planning document for indigenous ecosystem restoration. Council requests these roles are clarified via the methods and implementation responsibilities in accordance with the functions specified under sections 30 and 31 of the RMA.	Clarify methods to deliver the policy and who will be responsible for the implementation of the methods in accordance with the functions specified under sections 30 and 31 of the RMA.
S16.065	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support	Council supports the recognition of the significant role landowners and communities play in the management of indigenous biodiversity.	Retain
S16.066	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	<p>Council opposes the suggested introduction of a date by which city and district councils are to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values. With the anticipated gazettal of the NPS-IB it is inappropriate for the RPS to include arbitrary dates that may conflict with the requirements of the future NPS-IB. The RPS and district plans will need to be amended in accordance with the requirements of the NPS- IB once it comes into law in its final form.</p> <p>Councils supports the introduction of mana whenua into the policy as this provides clarity for city and district councils on who is to be involved in plan changes, however we oppose the retention of tangata whenua as the literal translation of this term means people of the land. We consider this does not provide councils with any direction on who should be involved in giving effect to the policy (and all other objectives and policies in RPS Change 1 where this term is used).</p>	Delete proposed insertion of the deadline for giving effect to the policy. Retain references to mana whenua. Delete references to tangata whenua.
S16.067	Chapter 4.1:	Policy 24: Protecting indigenous	Support in part	Council has the same concerns regarding the arbitrary timeframe as we raise under Policy 23 above.	Delete timeframe for giving effect to the policy. Amend to include the resource consent process.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Regulatory policies	ecosystems and habitats with significant indigenous biodiversity values - district and regional plans		Council supports the amendments to the policy that provide useful direction on how to consider biodiversity offsetting and biodiversity compensation. Such guidance would also be useful for the consideration of resource consents and notices of requirement.	
S16.068	Chapter 3.8: Natural hazards	Natural hazards introductory text	Support in part	<p>Council supports the amendments proposed to this introduction text - in particular the shift in language to include references to risk, likelihood, and consequences. The updated information regarding sea level rise predictions and the likely impacts of this on flood events is also useful for Council plan-making responsibilities with respect to future coastal hazards and flood hazard plan changes.</p> <p>Council requests this section be amended to include an outline of the requirements of the RMA for natural hazard avoidance and mitigation under section sections 30 and 31 of the RMA.</p> <p>Council requests GWRC states it will put in place provisions that require the avoidance and mitigation of coastal hazards (such as predicted coastal erosion above MHWS) via policies in the RPS and provisions including rules in the PNRP. If this is not to be inserted, Council requests the chapter introduction is amended to clearly explain the legislative and policy justification for not including such provisions in the RPS and regional plan(s).</p>	<p>Amend the chapter introduction to make it clear that city and district councils, and regional councils are responsible for provisions that require the avoidance and mitigation of natural hazards including significant coastal hazards (such as predicted coastal erosion above MHWS) via provisions in district plans, the RPS and the regional plan(s).</p> <p>Commit in the RPS that the regional plan will include provisions including rules to achieve the above.</p>
S16.069	Chapter 3.8: Natural hazards	Objective 19	Support	Council supports the changes proposed to Objective 19, in particular the focus on the minimisation of risks and consequences to the environment including the effects of climate change.	Retain.
S16.070	Chapter 3.8: Natural hazards	Objective 20	Oppose	The proposed objective wording does not differentiate between the significance of different levels of risk arising from natural hazards. The objective also does not reflect the wording of sections 30 and 31 with respect to regional council and territorial local authority functions for the avoidance and mitigation of natural hazards.	Amend Objective 20 so it reads as follows: Natural hazard and climate change mitigation and adaptation activities avoid minimise the risks from significant natural hazards and mitigate the risks from all other natural hazards and impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S16.071	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	<p>The proposed shift in language from avoiding inappropriate subdivision, use and development to managing these activities is not consistent with the avoidance and mitigation requirements of sections 30 and 31 of the RMA. Council also opposes the proposed reference to high risk, as this would make the policy less consistent with section 6(h) of the RMA, which refers to the management of significant risks from natural hazards.</p> <p>Council also notes the use of the verb manage or managing within resource management policy gives little direction to decision makers on what is required. Council is not aware of any agreed meaning of this term in resource management practice or relevant case law.</p> <p>Council requests all verbs used in the RPS align with those required under the RMA or relevant higher-level statutory planning documents and are chosen for their clear meaning and direction for decision makers. In the case of regional, city and district council requirements under the RMA for the management of natural hazards, the verbs are avoid or mitigate, while under the NZCPS the verbs are avoid inappropriate (in the case of significant natural hazard risk).</p> <p>Council notes for parts of the proposed policy to be able to be implemented they rely on parts of the explanation, yet explanatory text has no legal status in a plan under the RMA. An example of this is policy clause (d) relying on all clauses in the explanation. We request this be addressed by including the explanatory text within the policy and deleting any reference to 'Explanation' from the policy entirely. We note that clearly drafted policies should require no explanatory text.</p>	<p>Amend Policy 29 so it reads as follows: Policy 29: Avoiding inappropriate subdivision, use and development in areas at high subject to significant risk from natural hazards - district and regional plans. <i>[Note: Below comments do not form part of requested amendments to Policy 29]</i></p> <p>Replace all references to manage with appropriate verbs that provide clear direction to decision makers. Ensure the chosen verbs are consistent with requirements of the RMA and relevant higher-level statutory planning documents. Move the explanatory text so it forms part of the policy. Delete all remaining explanatory text following the transfer of relevant text into the policy.</p>
S16.072	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>We support the addition of subdivision and use to the policy, these would be welcome additions to regional plans to assist city and district councils in the avoidance of the effects arising from significant natural hazards.</p> <p>Council requests the policy be amended to reflect the responsibilities of regional and city and district councils under the RMA with respect to natural hazards.</p> <p>We also request the verbs used in the policy are consistent. As a consideration policy the wording of the rest of the policy should require consideration to the listed matters.</p>	<p>Amend Policy 51 as follows: Policy 51: Minimising Avoiding or mitigating the risks and consequences of natural hazards - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised, and/or in determining whether an activity is inappropriate particular regard consideration shall be given to:</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					(a) ...
S16.073	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	<p>Council considers water attenuation and retention should be required via regulatory methods. Council notes water attenuation via hydraulic neutrality is a recurring theme within the Whaitua plans that have been completed to date (which do not yet include the Kapiti Coast District).</p> <p>Council notes including water attenuation, retention and hydraulic neutrality requirements in the RPS would assist any city or district council that has included stormwater attenuation provisions in their Intensification Planning Instruments.</p>	Amend to require water attenuation and retention via hydraulic neutrality to be implemented in district plans via regulatory methods.
S16.074	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support	Council supports the intent of this policy and the identified methods and implementation responsibilities for this policy.	Retain
S16.075	Chapter 3.9: Regional form, design and function	General comments - urban development	Oppose	<p>Council notes the only hierarchical responsibilities given to regional councils under the NPS-UD that must inform and direct the content of district plans are:</p> <ol style="list-style-type: none"> 1. Clause 3.6 - Subclause (2) - Housing bottom lines. 2. Clause 3.8 - Subclause (3) - Criteria in the RPS for determining what plan changes will be treated, for the purpose of implementing Policy 8, as adding significantly to development capacity. <p>The remainder of the NPS-UD provisions that are relevant to regional policy statements and plans are equally applicable to city and district councils - meaning there is no statutory requirement for an RPS to direct how city and district councils are to give effect to all other RPS provisions. When this is taken into account it can be seen much of the RPS Change 1 content in the regional form, design and function chapter attempts to direct city and district councils on how to meet their obligations under the NPS-UD. Such direction is unhelpful, undesirable, and risks conflicting with the Intensification Planning Instruments of the Tier 1 local authorities in the region.</p>	Delete all non-mandatory provisions that are intended to direct city and district councils on how to give effect to the NPS-UD - i.e., only retain provisions in the RPS that give effect to Clause 3.8 Subclause 3 of the NPS-UD - noting Council also seeks amendments to these provisions as requested in this submission. Engage with the technical planning experts within all city and district councils in the region to prepare an appropriately worded variation to RPS Change 1 to give effect to the NPS-UD.
S16.076	Chapter 3.9: Regional form,	Issue 2: Sporadic, uncontrolled and/or	Support in part	Clause 2 is outdated as it does not identify the impacts of uncontrolled or uncoordinated development that is now enabled by the MDRS.	<p>Amend Clause 2 - Sporadic, uncontrolled and/or uncoordinated development, as follows:</p> <p>Sporadic, uncontrolled and/or uncoordinated, development</p>

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	design and function	uncoordinated development		Subclause (a) in particular regarding development that is poorly located in relation to existing infrastructure should identify the MDRS as a contributing factor to this challenge across the urban areas of Tier 1 city and district councils into the future.	(including of infrastructure) can adversely affect the region's compact form. Medium density residential development enabled across all urban areas in accordance with the Medium Density Residential Standards by Tier 1 territorial authorities adds to this issue. This can, among other things, result in: a) new development that is poorly located in relation to existing infrastructure (such as roads, public transport, water supply, sewage and stormwater systems)
S16.077	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	The objective proposes to introduce policy-level direction on what well-functioning urban environments are. We consider this level of detail should be deleted from the objective, with the objective retaining a high-level goal.	Amend Objective 22 to delete proposed clauses (a) - (k).
S16.078	Chapter 3.9: Regional form, design and function	Objective 22B	Support	The general intent of the objective is supported.	Retain
S16.079	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support in part	The proposed policy supports the proposed papakāinga provisions included in the Council's IPI. An amendment is sought to qualify that in the case of tangata whenua only, they must demonstrate an ancestral connection to their land. This amendment would make the policy consistent with the proposed papakāinga provisions notified by Council in its IPI that were developed in partnership with mana whenua. Council understands similar provisions have been notified in the IPIs of at least one other Tier 1 council in the region.	Amend policy UD.1 as follows: Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans District plans shall include objectives, policies, rules and/or methods that provide for the occupation, use, development and ongoing relationship of mana whenua with their ancestral land, and tangata whenua where it can be demonstrated that there is a whakapapa or ancestral connection to the land and the land will remain in Māori ownership, and the land will remain in Māori ownership with their ancestral land, by:

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					(a) ...
S16.080	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>Council opposes a number of provisions within this policy on the basis they:</p> <ol style="list-style-type: none"> 1. attempt to transfer some regional council responsibilities for freshwater to city and district councils under the guise of the reference to integrated management under section 31 of the RMA. 2. lack detail on how they would be implemented including what the subdivision, use and development triggers would be for their implementation. <p>In places the policy merely repeats provisions of the NPS-FM and attempts to transfer them into a policy for city and district councils to implement via district plans. The main NPS-FM policies that are relevant appear to be Policies 3 and 7. Although we agree the NPS-FM introduces freshwater management considerations into the RMA plan making processes of city and district councils, we are concerned at the blunt approach taken by proposed Policy FW.3, and the apparent lack of consideration of the roles, functions, and expertise of city and district councils. It is our view the RPS is required to take a much more refined and carefully justified approach in setting requirements for district plans in the management of freshwater. This should be carried out in direct consultation with the technical experts of the city and district councils in the region.</p> <p>We consider the approach taken is not consistent with the intent of the NPS-FM for the following reasons:</p> <ol style="list-style-type: none"> 1. The section 32 evaluation supporting the NPS-FM states: <ol style="list-style-type: none"> a. All councils will be affected as regional policy statements, regional plans and district plans are all required to give effect to the NPS-FM 2020. All councils will also need to observe and enforce compliance with the NES-F. However, regional councils will be more affected as the matters addressed by the NPS-FM 2020 and NES-F are more within their functions(2). [Note '2' references Action for Health Waterways Section 32 Evaluation, Ministry for the Environment, 22 July 2020, page 18] b. There is a low level of uncertainty associated with Policy 3 because it closely reflects the statutory functions of local 	<p>Either: Delete Policy FW.3 and redraft in collaboration with technical experts from city and district councils to prepare a variation to the RPS Change 1; or Delete clauses b, f, g, h, m, n, and o.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>councils in section 31 of the RMA but gives greater specificity in regarding the whole-of-catchment approach. Any risk of overlap or confusion on roles or responsibilities is low (3).</p> <p>[Note '3' references: Action for Health Waterways Section 32 Evaluation, Ministry for the Environment, 22 July 2020, page 44.]</p> <p>2. Council notes the guidance on this matter released by the Ministry for the Environment for territorial local authorities does not support the approach taken by Policy FW.3 as follows:</p> <p>The NPS-FM 2020 does not provide specific directions about what approaches territorial authorities should use to manage the effects of land use and development on freshwater in district plans. The approach provides flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district .</p> <p>Council would therefore expect the RPS to be drafted without introducing confusion over roles and responsibilities for freshwater. The RPS should include requirements for the district plan include provisions that consider the cumulative effects of development on freshwater in catchments in accordance with the integrated management of natural resources. Such an approach would fit well with the yet to be developed Whaitua plan for the Kapiti Coast District. However, we expect such direction to be accompanied by policies that direct and inform city and district councils on how to achieve this within the roles and functions city and district councils have under the RMA. Council understands such an approach would be consistent with the intent of the NPS-FM. The transfer of functions approach proposed by RPS Change 1 does not appear to have been adequately considered as it conflicts with the Governments section 32 for the NPS-FM and MfE guidance on the roles of regional and city and district councils in giving effect to the NPS-FM. The Policy FW.3 provisions of most concern to us with respect to lack of clarity and the attempt to transfer regional council functions to Council are clauses b, f, g, h, m, n, and o.</p>	
S16.081	Chapter 4.1:	Policy FW.4: Financial contributions	Support in part	This policy is helpful in supporting the inclusion of financial contributions in the district plan, particularly those proposed	Amend as follows: Policy FW.4: Financial contributions for urban development - district plans

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	Regulatory policies	for urban development - district plans		under section 80E(1)(b)(i) of the RMA. However, the policy includes unnecessary text which we seek be removed.	District plans shall include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent where off site stormwater quality and quantity treatment is required, as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose. Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence Explanation Policy FW.4 requires financial contributions, or alternatively development contributions to be collected for the construction of catchment scale stormwater solutions, so that urban new urban development pays their fair share.
S16.082	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose	<p>Council opposes clause (a)(iii) as it goes beyond the requirements of the NPS-UD and the RMA by preventing city and district councils from applying urban zones other than those where the Medium Density Residential Standards would be applied.</p> <p>Council notes it is not the role of the RPS to determine whether significant development capacity could be realised through other zoning, such as mixed-use zones and other centre zones. Council also notes that neither the RMA or the NPS-UD gives a regional council the power to direct district plan content to the level of the specific zones that must be applied through plan changes.</p> <p>Council sees no resource management reason for (or benefit to be gained from) this regulatory direction, and we consider that the suggested limitation on how housing may be provided for via zoning is not appropriate or useful for an RPS to</p>	Delete clause (a)(iii).

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				specify. We consider the directive approach proposed may not be vires the RMA.	
S16.083	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Oppose	<p>Council opposes references to the WRGF and the attempt to give the document legal weight under the RMA as we express elsewhere in our submission. We seek deletion of such references from Policy 67 (and from throughout the plan change).</p> <p>We also oppose the inclusion and use of proposed definitions for high density development and medium density residential development. As expressed elsewhere in our submission, these definitions are not consistent with the NPS-UD and conflict with the Intensification Planning Instrument notified by Council.</p>	<p>Amend Policy 67 as follows:</p> <p>(a) implementing the New Zealand Urban Design Protocol and any urban design guidance that provides for best practice urban design and amenity outcomes, including for high density development and medium density residential development;</p> <p>(e) implementing the actions in the Future Development Strategy, or the regional and local strategic growth and/or development framework or strategy that describes where and how future urban development should occur in the region; and</p>
S16.084	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Oppose	<p>While Council supports enhancing the viability and vibrancy of all centres, the reasons for changes to the terminology in this policy are unclear.</p> <p>In particular, Council notes that:</p> <ul style="list-style-type: none"> • new terms such as "locally significant centres" do not appear to correlate with terms in the national planning standards • it is unclear why Ōtaki and Waikanae are included in a list of "locally significant centres" but not Raumati Beach and Paraparaumu Beach which are also classified as "town centres" in the Operative Kapiti Coast District Plan 2021 • it is unclear whether Ōtaki is intended to mean the town centre known as Ōtaki Main Street, or the town centre known as Ōtaki Rail, or both. • in the absence of any justification to the contrary, it is inappropriate and unnecessary for the RPS to get to the level of detail specifying any particular centres as being "locally significant". 	Delete the list of locally significant centres.
S16.085	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and	Oppose	<p>The proposed policy is out of step with the NPS-UD and conflicts with the Intensification Planning Instrument (IPI) notified by Council.</p> <p>The policy wording attempts to interpret the requirements of the NPS-UD but appears to insert GWRC's understanding of</p>	<p>Either:</p> <p>Amend to ensure consistency with the wording of the NPS-UD and to ensure wording does not conflict with the Intensification Planning Instruments that have been notified by Tier 1 city and district councils.</p> <p>OR</p>

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		density - district plans		heights and densities for medium and high density development via new requirements and unwarranted new definitions. This is neither necessary nor useful to city and district councils that have notified their Intensification Planning Instruments. Combined with the proposed new definitions for medium density residential development and high density development (which we also oppose), the result is a policy that interferes and conflicts with Council's IPI, and likely the IPIs of other Tier 1 city and district councils in the region. Also see our specific concerns regarding proposed defined terms in our submission below which are also relevant to Policy 31.	Delete Policy 31 entirely and work with the technical planning experts from Tier 1 city and district councils on appropriate policy wording to be notified as a variation to Proposed RPS Change 1.
S16.086	Appendix 3: Definitions	Complex development opportunities	Oppose	Council notes the Wellington Regional Leadership Committee has no statutory authority under the RMA. We consider it is inappropriate for a regional policy statement to include provisions that refer to committees and government agencies to jointly develop and implement plans and a framework for development opportunities.	Delete proposed definition for complex development opportunities and associated references throughout the plan change including Method 46.
S16.087	Appendix 3: Definitions	Future Development Strategy	Oppose	All Tier 1 local authorities have a requirement to prepare a FDS in accordance with Subpart 4 of the NPS-UD. All Tier 1 city and district councils in the region are authorised to prepare a FDS in accordance with the NPS-UD. On this basis the proposed definition is incorrect and should simply refer to subpart 4 of the NPS-UD.	Amend as follows: Future Development Strategy Means any Future Development Strategy prepared and published for the Wellington Regional in accordance with Subpart 4 of the National Policy Statement for Urban Development.
S16.088	Appendix 3: Definitions	High density development	Oppose	Specifying a minimum building height for high density development is not necessary or helpful to city and district councils in carrying out their functions when giving effect to the MDRS and the requirements of NPS-UD Policies 3 and 4. The proposed height specifications and list of activities that comprise high density development misinterpret NPS-UD requirements and the definition is not required for city and district councils to give effect to the NPS-UD. Council requests the proposed definition be deleted.	Amend as follows: High density development Means areas used predominately for commercial, residential and mixed use activities with high concentration and bulk of buildings, such as apartments, and other compatible activities with a minimum building height of 6 stories.
S16.089	Appendix 3: Definitions	Maintain /maintained /maintenance: (in relation to indigenous biodiversity)	Oppose	Council notes restoration and enhancement are separate activities that require a greater level of intervention and action than that required to maintain. Council opposes the definition including restoration and enhancement activities as part of the maintenance of indigenous biodiversity.	Amend as follows: Maintain /maintained /maintenance (in relation to indigenous biodiversity) At least no reduction in the following: a) the size of populations of indigenous species b) indigenous species occupancy across their natural range c) the properties and function of ecosystems and habitats d) the full range and extent of ecosystems and habitats

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					e) connectivity between and buffering around, ecosystems f) the resilience and adaptability of ecosystems. The maintenance of indigenous biodiversity may also require the restoration or enhancement of ecosystems and habitats.
S16.090	Appendix 3: Definitions	Medium density residential development	Oppose	<p>Council notes medium density residential development is a description of the intensity of the use of a site. Medium density residential development can comprise developments less than 3 stories, and there are many examples of this throughout the region. The proposed definition conflicts with the definition for medium density housing proposed in Council's IPI. If it considered necessary for the RPS to include a definition for medium density residential development, it is crucial the definition is an umbrella term that does not conflict with the definitions and other provisions proposed within the Intensification Planning Instruments notified within the region.</p> <p>It also appears the proposed height specification within the definition has cross-over with the height limits suggested in the proposed definition for high density development. Council considers it is not necessary or appropriate for the RPS to specify minimum heights for different types of development. Council notes the NPS-UD does not give the regional council the function of specifying what type of development can be considered medium density residential development within the region.</p> <p>Council also notes including and other compatible activities without a qualifier creates uncertainty and opens the interpretation of the proposed definition to debate. Compatible activities will be defined differently within the district plans across the region. Council seeks the definition is deleted to avoid conflict with the IPIs notified by Tier 1 Councils in the region.</p>	Amend as follows: Medium density residential development Means areas used predominately for residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, and low-rise apartments, and other compatible residential activities with a minimum building height of 3 stories.
S16.091	Appendix 3: Definitions	Plantation forestry	Oppose	Council considers the definition should align with that used in the NES-PF. In the absence of amendments to ensure consistency with the NES-PF the proposed definition captures orchards and other similar activities.	Amend to align with the NES-PF definition for plantation forestry.
S16.092	Appendix 3: Definitions	Permanent forest	Oppose	The definition includes a qualifier that relies on the intention of the owner of the forest. Council notes it is difficult to enforce provisions that contain such qualifiers - confirming and enforcing the intention of a person or persons is not possible under the RMA.	Amend as follows: For the purpose of the RPS permanent forest is a forest established for long term forest cover and that is not intended to be

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					harvested.
S16.093	Appendix 3: Definitions	Regionally significant infrastructure	Support in part	<p>Council supports the inclusion of the following in the definition of regionally significant infrastructure:</p> <ul style="list-style-type: none"> • the local authority water supply network (including intake structures) and water treatments plants • the local authority wastewater and stormwater networks and systems, including treatment plants and storage and discharge facilities • The following local arterial routes: Masterton-Castlepoint Road, Blairlogie-Langdale/Homewood/Riversdale Road and Cape Palliser Road in Wairarapa, Titahi Bay Road and Grays Road in Porirua, and Kāpiti Road, Marine Parade, Mazengarb Road, Te Moana Road, Akatārawa Road, Matatua Road, Rimu Road, Epiha Street, Paekakariki Hill Road, The Parade [Paekakariki] and The Esplanade [Raumati South] in Kāpiti • Kapiti Coast Airport <p>Council also seeks that the following roads be added to the definition, which will become Council's responsibility once revocation occurs:</p> <ul style="list-style-type: none"> • Old SH1 (Main Road Raumati) - from Poplar Avenue to Raumati Road Roundabout. • Old SH1 (Main Road Paraparaumu) - from Raumati Road roundabout to Otaihanga Road roundabout. • Old SH1 (Main Road Waikanae) - from Otaihanga Road roundabout to Peka Peka Road roundabout. • Old SH1 (Main Road Te Horo) - from Peka Peka Road roundabout to Otaki River Bridge. • Old SH1 (Main Road Otaki) - Otaki River Bridge to Taylors Road • Old SH1 (Main Road North Otaki) - Taylors Road to District Boundary 	<p>Retain the inclusion of the following infrastructure:</p> <ul style="list-style-type: none"> • the local authority water supply network (including intake structures) and water treatments plants • the local authority wastewater and stormwater networks and systems, including treatment plants and storage and discharge facilities • The following local arterial routes: Masterton-Castlepoint Road, Blairlogie- Langdale/Homewood/Riversdale Road and Cape Palliser Road in Wairarapa, Titahi Bay Road and Grays Road in Porirua, and Kāpiti Road, Marine Parade, Mazengarb Road, Te Moana Road, Akatārawa Road, Matatua Road, Rimu Road, Epiha Street, Paekakariki Hill Road, The Parade [Paekakariki] and The Esplanade [Raumati South] in Kāpiti • Kapiti Coast Airport <p>Amend definition as necessary to also include:</p> <ul style="list-style-type: none"> • Old SH1 (Main Road Raumati) - from Poplar Avenue to Raumati Road Roundabout. • Old SH1 (Main Road Paraparaumu) - from Raumati Road roundabout to Otaihanga Road roundabout. • Old SH1 (Main Road Waikanae) - from Otaihanga Road roundabout to Peka Peka Road roundabout. • Old SH1 (Main Road Te Horo) - from Peka Peka Road roundabout to Otaki River Bridge. • Old SH1 (Main Road Otaki) - Otaki River Bridge to Taylors Road • Old SH1 (Main Road North Otaki) - Taylors Road to District Boundary

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S16.094	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	<p>Opposes all references to the Wellington Regional Growth Framework within the RPS, and in particular the suggestion it forms the interim strategic growth direction for the region prior to the development of a Future Development Strategy (FDS) under the NPS-UD.</p> <p>The development of the WRGF was not significantly robust and did not follow the special consultative procedure required for a plan or strategy under the Local Government Act, and it therefore lacks any statutory weight under the RMA as a document prepared under other legislation.</p> <p>References to the WRGF, and the interim legal status, undermines and fails to acknowledge existing growth strategies prepared by city and district councils in the region under the LGA. They accordingly carry weight under the RMA when preparing and changing plans (s.74(2)(b)(i)).</p> <p>Notes the statutory weight of a non-statutory document such as the WRGF is not given statutory weight simply via its inclusion in the RPS unless the pre-notification consultation requirements of Schedule 1, Clause 34 were carried out before RPS Change 1 was publicly notified. Not aware of this mandatory consultation having been carried out.</p>	<p>Delete all references to, and information from the WRGF throughout proposed RPS Change 1.</p> <p>Replace all references to the WRGF with placeholder references to a Future Development Strategy that has been prepared and published in accordance with the requirements of Subpart 4 of the NPS-UD.</p>
S16.095	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support	Supports the reference to the importance of design guides in achieving well-functioning urban environments. Also supports the recognition that sporadic, uncontrolled and uncoordinated development can result in adverse effects on mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.	Not stated.

S36 Karl Rapley

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S36 Karl Rapley					
S36.001	Chapter 3.1A:	General comments -	Support	Climate change is the most significant issue of our time. Climate change mitigation is critical to meeting emissions	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Climate change	climate change		reduction targets and mitigating the devastating effects that climate change will have on our region. Support the climate change provisions in plan change 1. This applies to all proposed provisions in Chapter3.1A and the councilors support the proposed direction of plan change 1	

S51 Khoi Phan

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S51 Khoi Phan					
S51.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support councils ensuring that more homes doesn't mean more emissions. There are plenty of reasons why it's easier and more profitable to do traditional car- centric suburban greenfield. That is why it's extra important for councils -to do everything they possibly can to get good intensification for growth, rather than greenfield. Not opposed to greenfield that can pass the test of being founded on high accessibility, not mobility, and whose movement network is very sustainable.	Retain and strengthen provisions relating to intensification rather than greenfield growth.
S51.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Not Stated / Neutral	Active transport mode must be integrated into existing plans for public transport to further enable Bike-Train mode. Currently there are provision to encourage the uptake of this mode in the regional plan, district plan nor the regional-rail business case.	Strengthen provision relating to public and active transport.
S51.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Requirements to have TDM plan not strong enough. There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools than TDM plans, provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S51.005	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification.
S51.006	Chapter 3.4: Fresh water (including	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	public access)				
S51.007	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support provisions relating to creating climate-resilient urban areas.	Retain, refine and enhance provisions.
S51.008	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support the provisions supporting biodiversity.	Retain, refine and enhance provisions.

S18 Kit Withers

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S18 Kit Withers					
S18.001	General comments	General comments - overall	Support	Support GWRC leading the way on preparing for climate change.	Retain provisions to relate to preparing for climate change.

S124 KiwiRail Holdings Limited

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S124 KiwiRail Holdings Limited					
S124.001	Chapter 3.1A: Climate change	Objective CC.3	Support	KiwiRail, as a provider of low carbon emission transport, is supportive of Council's objective to contribute to a 50 percent reduction in net greenhouse gas emissions.	Retain as notified.
S124.002	Chapter 3.9: Regional form, design and function	Objective 22	Support	KiwiRail supports Objective 22(c) to 'improve the overall health, well-being and quality of life of people in the region'. This objective is appropriate to give effect to Objective 1 of the NPS-UD and to recognise that providing for the health and well-being of our communities relies on having appropriate planning provisions in place, such as controls on development near the rail corridor. Providing for wellbeing of our	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				communities also relies on having the necessary infrastructure in place to support urban development.	
S124.003	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Not Stated / Neutral	KiwiRail supports the new policy which requires transport infrastructure planning to consider and choose solutions that will contribute to reducing greenhouse gas emissions.	Retain as notified.
S124.004	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	KiwiRail supports the new policy which requires district plans to provide a supportive planning framework (for example, permitted activity status) for zero and low-carbon multi modal transport infrastructure, such as public transport infrastructure.	Retain as notified
S124.005	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	KiwiRail supports the amendments to Policy 7 and the policy explanation. Recognition of the benefits of regionally significant infrastructure, particularly where it contributes to reducing greenhouse gas emissions, is supported by KiwiRail.	Retain as notified.
S124.006	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	<p>KiwiRail broadly supports Policy 31 as notified, but considers that further amendments are required to ensure consistency with the NPS-UD and the Resource Management (EnablingHousing Supply) Amendment Act 2021.</p> <p>Where urban development is enabled in new areas and at a higher density near lawfully established activities, like transport corridors, there is a need to ensure reverse sensitivity effects do not constrain the safe and efficient operation of transport networks. The Resource Management (Enabling Housing Supply) Amendment Act 2021 recognises a nuanced approach</p>	Amend the policy as. District plans shall include policies, rules and/or methods that identify and enable a range of different building heights and density within urban areas where it contributes to maintaining, establishing or improving the qualities and characteristics of well-functioning urban environments, except where qualifying matters reduce building height and/or density of urban form , including as a minimum:

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				to urban development where a qualifying matter applies. Amendments are also necessary to recognise qualifying matters at the RPS level to ensure the district planning framework appropriately gives effect to the higher order planning documents.	
S124.007	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support	KiwiRail supports the amendments to Policy 39 and the policy explanation. Recognition of the benefits of regionally significant infrastructure, particularly where it contributes to reducing greenhouse gas emissions, is supported by KiwiRail.	Retain as notified.
S124.008	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	KiwiRail supports Policy 52 which recognises that, in some instances, hard engineering methods are necessary to protect regionally significant infrastructure from unacceptable risks from natural hazards. There are sections of the rail corridor which run parallel to the coastline and are vulnerable to storm surge and high tides. KiwiRail support policy direction which acknowledges risk of hazards, including coastal hazards, to infrastructure and the need to construct hard structures as a protective measure.	Retain as notified
S124.009	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support	KiwiRail supports the amendment to Policy 55 which recognises the value of regionally significant infrastructure and the contribution of such infrastructure to a well- functioning urban environment. The reference to Policy 8 which expressly recognises the importance of protecting regional significant infrastructure from incompatible subdivision, use and development is supported.	Retain as notified.
S124.010	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas -	Support in part	KiwiRail supports the intent of Policy 56 to provide a framework that manages development in rural areas in accordance with sound resource management principles. A further amendment is proposed to expressly recognise and provide for the avoidance of reverse sensitivity effects as one of those	<i>[Note: stated "Seek amendment" in original submission]</i> New subclause.(f) the proposal will result in reverse sensitivity effects.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration		principles, as this is a critical resource management issue that must be managed when providing for growth of urban activities near lawfully established transport corridors.	
S124.011	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support in part	<p>KiwiRail supports the intent of Policy 57 but considers that express recognition is needed for the consideration of reverse sensitivity effects which must be carefully managed when providing for land use and transport integration.</p> <p>KiwiRail considers express recognition of reverse sensitivity effects is necessary to ensure development near transport corridors can co-exist in an appropriate way. The Resource Management (Enabling Housing Supply) Amendment Act also expressly recognises and provides a nuanced approach to development where qualifying matters apply (including for example the provision of nationally or regionally significant infrastructure).</p>	<p><i>[Note: stated "Seek amendment" in original submission]</i></p> <p>New subclause.</p> <p>iii. Let's Get Wellington Moving Growth Corridor; and(g) avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.</p>
S124.012	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>KiwiRail broadly supports the intent of Policy UD.3 to provide significant development capacity, but this needs to be carefully managed to ensure that any effects at the interface of conflicting land uses, including reverse sensitivity effects, are appropriately managed. This is critical to recognise and provide for well-functioning urban environments in accordance with the direction in the NPS-UD.</p>	<p><i>[Note: stated "Seek amendment" in original submission]</i></p> <p>New subclause under (a)</p> <p>(a) the location, design and layout of the proposal iv. minimises land use conflicts as far as practicable, including avoiding the potential for reverse sensitivity effects.</p>
S124.013	Appendix 3: Definitions	Regionally significant infrastructure	Support in part	<p>KiwiRail supports the definition of Regional Significant Infrastructure and inclusion of the Strategic Transport Network including ancillary structures required to operate, maintain, upgrade and develop that network. The amended definition applies to both rail and ferry terminal infrastructure which is supported by KiwiRail. KiwiRail seeks an addition to clarify that the Interislander ferry terminal is expressly included in this definition. The description of the Strategic Transport Network in Appendix B of the Wellington Regional Land Transport Plan 2021 refers to railway corridors. While the railway corridor extends to the Interislander ferry terminal, it is not expressly referenced in the description. KiwiRail seeks to avoid any ambiguity that the ferry terminal is not part of the Strategic Transport Network.</p>	<p>Amend as follows: Regionally significant infrastructure includes:</p> <p>...</p> <ul style="list-style-type: none"> • Interislander Ferry Terminal, Wellington City bus terminal and Wellington Railway Station terminus; <p>.....</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S124.014	Appendix 3: Definitions	Strategic Transport network	Support	KiwiRail supports the inclusion of all railway corridors as identified in the Wellington Regional Land Transport Plan 2021 in this definition.	Retain as notified.
S124.015	Appendix 3: Definitions	General comments - definitions	Support in part	KiwiRail seeks the inclusion of a definition for "well- functioning urban environments" which is consistent with the NPS-UD.	New definition of "well- functioning urban environments" Well-functioning urban environment has the meaning in Policy 1 of the National Policy Statement on Urban Development 2020.

S85 Lachlan Patterson

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S85 Lachlan Patterson					
S85.001	Chapter 3.1A: Climate change	General comments - climate change	Support	Support new emissions targets, particularly to halve emissions by 2030, and to reduce land transport emissions by 35%.	Retain as notified.
S85.002	General comments	General comments - overall	Support	<p>Car-dependent sprawling developments should not be the norm, or even tolerated, in a climate crisis. We need our development and urban form to work in tandem with the radical mode shift we need for a zero carbon capital city.</p> <p>Support the changes that ensure Councils require new developments to minimise private vehicle use and encourage public and active transport instead. New subdivisions will last for decades. The way they are developed and designed now will lock in dependence on particular modes that are bad for our planet and also bad for communities and their wellbeing. This needs to be avoided at the start. Support the need for travel demand management plans in these developments.</p> <p>Any tools in the RPS to support Councils to discourage car dependency ought to be strengthened where possible.</p>	Retain as notified.
S85.004	General comments	General comments - overall	Support	Strongly support the provisions incorporating Te Mana o te Wai, supporting the Blue Belt, and supporting climate resilient urban areas.	Retain as notified.
S85.005	Chapter 3.6: Indigenous	General comments - overall	Support	Strongly support the provisions strengthening protection and enhancement of our biodiversity, given the significant biodiversity crisis we are also faced with.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	ecosystems				

S107 Lisa Keown_Mangaroa Peatland Focus Group

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S107 Lisa Keown_Mangaroa Peatland Focus Group					
S107.002	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S107.003	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S107.004	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		values - consideration		'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S107.005	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S107.006	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S146 Mangaroa Peatland Focus Group_Alan Rothwell

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S146 Mangaroa Peatland Focus Group_Alan Rothwell					
S146.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					biodiversity and ultimately, people.
S146.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S146.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S146.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S146.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	

S26 Mangaroa Peatland Focus Group_Andrea Follett

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S26 Mangaroa Peatland Focus Group_Andrea Follett					
S26.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S26.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted"
S26.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		values - consideration		'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S26.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S26.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. The assessment of what is needed to restore a habitat etc. should not come down to the subjective opinion of a council official, given that GWRC has strongly stated environmental goals. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S41 Mangaroa Peatland Focus Group_Andrew Ayrton & Carol Reeves

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S41 Mangaroa Peatland Focus Group_Andrew Ayrton & Carol Reeves					
S41.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					biodiversity and ultimately, people.
S41.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S41.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S41.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S41.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	

S150 Mangaroa Peatland Focus Group_Anna Brodie & Mark Leckie

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S150 Mangaroa Peatland Focus Group_Anna Brodie & Mark Leckie					
S150.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S150.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S150.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		with significant indigenous biodiversity values - consideration		within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S150.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S150.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. The assessment of what is needed to restore a habitat etc. should not come down to the subjective opinion of a council official, given that GWRC has strongly stated environmental goals. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S159 Mangaroa Peatland Focus Group_Antony & Jemma Ragg

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S159 Mangaroa Peatland Focus Group_Antony & Jemma Ragg					

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S159.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S159.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S159.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S159.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					landowners.
S159.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S43 Mangaroa Peatland Focus Group_Carol Dormer

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S43 Mangaroa Peatland Focus Group_Carol Dormer					
S43.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S43.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors	Delete the phrase "and their restoration is promoted".

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				that the land subject to that decision was not and is not a natural wetland.	
S43.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.</p> <p>To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S43.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	<p>GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.</p>	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S43.005	Appendix 3: Definitions	Restoration	Oppose in part	<p>The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included.</p> <p>Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.</p>	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S109 Mangaroa Peatland Focus Group_Christine withey					
S109.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S109.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S109.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S109.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				individual landowners and not on single one has been consulted.	Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S109.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case

S39 Mangaroa Peatland Focus Group_Colin Hawes

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S39 Mangaroa Peatland Focus Group_Colin Hawes					
S39.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S39.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.	Delete the phrase "and their restoration is promoted".

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		- regional plans		For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S39.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S39.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S39.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S48 Mangaroa Peatland Focus Group_Duncan Carmichael					
S48.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S48.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S48.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S48.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				individual landowners and not on single one has been consulted.	Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S48.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S91 Mangaroa Peatland Focus Group_Gavin Kirton

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S91 Mangaroa Peatland Focus Group_Gavin Kirton					
S91.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S91.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also	Delete the phrase "and their restoration is promoted".

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		- regional plans		acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S91.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.</p> <p>To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S91.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	<p>GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted. The community feels very strongly regarding the high-handed approach taken by GWRC and the devious way it appears to be trying to gain control of all aspects regarding the peatland.</p> <p>The inclusion of the reference to peatland within a definition constitutes an attempt to regulate by stealth, and flies in the face of the Environment Court's expectation that people on the peatland would be left to the quiet enjoyment on their land. It smacks of bad faith regulation.</p> <p>The community is aware that GWRC officials have long sought to limit use of the peatland, first through wetland rules, then using SNA rules and now, it seems by citing it as a carbon sink.</p>	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S91.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	

S42 Mangaroa Peatland Focus Group_Gregor & Stephanie Kempt

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S42 Mangaroa Peatland Focus Group_Gregor & Stephanie Kempt					
S42.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S42.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S42.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		with significant indigenous biodiversity values - consideration		within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S42.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S42.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S38 Mangaroa Peatland Focus Group_Heather McKay

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S38 Mangaroa Peatland Focus Group_Heather McKay					
S38.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				taken with the concept of returning something to a loosely defined prior state.	changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S38.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".
S38.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.</p> <p>To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S38.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S38.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S54 Mangaroa Peatland Focus Group_Helen Masters

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S54 Mangaroa Peatland Focus Group_Helen Masters					
S54.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S54.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".
S54.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.</p> <p>To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S54.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	<p>GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.</p>	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S54.005	Appendix 3: Definitions	Restoration	Oppose in part	<p>The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included.</p> <p>Balancing perspectives are needed from expert advisors and from people directly affected in the local community.</p>	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	

S23 Mangaroa Peatland Focus Group_Ian Spendlove

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S23 Mangaroa Peatland Focus Group_Ian Spendlove					
S23.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: "Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people."
S23.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S23.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values -	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration		activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S23.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S23.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S122 Mangaroa Peatland Focus Group_Jaime Walsh

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S122 Mangaroa Peatland Focus Group_Jaime Walsh					
S122.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S122.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S122.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S122.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S122.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	

S160 Mangaroa Peatland Focus Group_Jen & Chris Priest

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S160 Mangaroa Peatland Focus Group_Jen & Chris Priest					
S160.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S160.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S160.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		values - consideration		'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S160.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S160.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S138 Mangaroa Peatland Focus Group_Jody Sinclair & Josh Lowny

S138 Mangaroa Peatland Focus Group_Jody Sinclair & Josh Lowny					
S138.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.

S138.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S138.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S138.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S138.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.

S110 Mangaroa Peatland Focus Group_John Ryan

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S110 Mangaroa Peatland Focus Group_John Ryan					
S110.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S110.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S110.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values -	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration		To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S110.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S110.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case

S108 Mangaroa Peatland Focus Group_Kerry Ryan

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S108 Mangaroa Peatland Focus Group_Kerry Ryan					
S108.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S108.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S108.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S108.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S108.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	

S40 Mangaroa Peatland Focus Group_Lauritz & Julie Rust

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S40 Mangaroa Peatland Focus Group_Lauritz & Julie Rust					
S40.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S40.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S40.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		biodiversity values - consideration		which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S40.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S40.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S21 Mangaroa Peatland Focus Group_Liorah Atkinson

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S21 Mangaroa Peatland Focus Group_Liorah Atkinson					
S21.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: "Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					biodiversity and ultimately, people."
S21.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.</p>	Delete the phrase "and their restoration is promoted".
S21.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.</p> <p>To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S21.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	<p>GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.</p>	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S21.005	Appendix 3: Definitions	Restoration	Oppose in part	<p>The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to</p>	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	

S46 Mangaroa Peatland Focus Group_Lynne Hill

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S46 Mangaroa Peatland Focus Group_Lynne Hill					
S46.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S46.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S46.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		significant indigenous biodiversity values - consideration		meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S46.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S46.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S101 Mangaroa Peatland Focus Group_Madeline Keown

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S101 Mangaroa Peatland Focus Group_Madeline Keown					
S101.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					biodiversity and ultimately, people.
S101.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S101.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S101.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S101.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	

S149 Mangaroa Peatland Focus Group_Matthew Rothwell

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S149 Mangaroa Peatland Focus Group_Matthew Rothwell					
S149.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S149.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted."
S149.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		with significant indigenous biodiversity values - consideration		within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S149.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S149.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. The assessment of what is needed to restore a habitat etc. should not come down to the subjective opinion of a council official, given that GWRC has strongly stated environmental goals. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S55 Mangaroa Peatland Focus Group_Matthew Scrimshaw

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S55 Mangaroa Peatland Focus Group_Matthew Scrimshaw					
S55.001	Chapter 3.1A:	Climate change	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Climate change	introductory text		protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S55.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S55.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S55.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S55.005	Appendix 3: Definitions	Restoration	Oppose in part	<p>The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included.</p> <p>Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.</p>	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S97 Mangaroa Peatland Focus Group_Nicola Rothwell

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S97 Mangaroa Peatland Focus Group_Nicola Rothwell					
S97.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	<p>The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.</p>	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S97.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?"</p> <p>The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC.</p> <p>For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors</p>	Delete the phrase "and their restoration is promoted".

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				that the land subject to that decision was not and is not a natural wetland.	
S97.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.</p> <p>To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S97.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	<p>GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.</p>	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S97.005	Appendix 3: Definitions	Restoration	Oppose in part	<p>The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included.</p> <p>Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.</p>	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S47 Mangaroa Peatland Focus Group_Norman Hill					
S47.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S47.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S47.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S47.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				individual landowners and not on single one has been consulted.	Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S47.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S20 Mangaroa Peatland Focus Group_Paul Dyson

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S20 Mangaroa Peatland Focus Group_Paul Dyson					
S20.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S20.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the	Delete the phrase "and their restoration is promoted".

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S20.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.</p> <p>To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S20.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S20.005	Appendix 3: Definitions	Restoration	Oppose in part	<p>The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included.</p> <p>Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.</p>	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S44 Mangaroa Peatland Focus Group_Richard Dormer					
S44.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S44.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S44.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S44.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				individual landowners and not on single one has been consulted.	implications around and compensation for any loss of use by landowners.
S44.005	Appendix 3: Definitions	Restoration	Oppose in part	<p>The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. The assessment of what is needed to restore a habitat etc. should not come down to the subjective opinion of a council official, given that GWRC has strongly stated environmental goals.</p> <p>Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.</p>	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S112 Mangaroa Peatland Focus Group_Russell Flood-Smith

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S112 Mangaroa Peatland Focus Group_Russell Flood-Smith					
S112.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S112.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which	Delete the phrase "and their restoration is promoted".

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		water bodies - regional plans		hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S112.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S112.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S112.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S59 Mangaroa Peatland Focus Group_Sandra & Mat Gerrard					
S59.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S59.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S59.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S59.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				individual landowners and not on single one has been consulted.	Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S59.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S33 Mangaroa Peatland Focus Group_Sandy, Judith, Kauika-Stevens

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S33 Mangaroa Peatland Focus Group_Sandy, Judith, Kauika-Stevens					
S33.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S33.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the	Delete the phrase "and their restoration is promoted"

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S33.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S33.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S33.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. The assessment of what is needed to restore a habitat etc. should not come down to the subjective opinion of a council official, given that GWRC has strongly stated environmental goals. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S121 Mangaroa Peatland Focus Group_Shane Stratford					
S121.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S121.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S121.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S121.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				individual landowners and not on single one has been consulted.	Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S121.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S111 Mangaroa Peatland Focus Group_Sheila Ryan

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S111 Mangaroa Peatland Focus Group_Sheila Ryan					
S111.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S111.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also	Delete the phrase "and their restoration is promoted".

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		- regional plans		acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S111.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S111.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S111.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S103 Mangaroa Peatland Focus Group_ Stacey Jack-Kino					
S103.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S103.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S103.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S103.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				individual landowners and not on single one has been consulted.	Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S103.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S156 Mangaroa Peatland Focus Group_Tim Rothwell

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S156 Mangaroa Peatland Focus Group_Tim Rothwell					
S156.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S156.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the	Delete the phrase "and their restoration is promoted".

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S156.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S156.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S156.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S45 Mangaroa Peatland Focus Group_Weston Hill					
S45.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S45.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S45.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S45.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				individual landowners and not on single one has been consulted.	Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S45.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.

S63 Mary Beth Taylor

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S63 Mary Beth Taylor					
S63.001	General comments	General comments - overall	Support	Supports the Proposed Change 1 to the RPS for Wellington Region in its entirety	Retain as notified, with some suggested amendments.
S63.003	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	Finite planet with finite resources = finite growth. Te Awa Kairangi is exhibiting symptoms of having reached its limit for extraction. This would logically mean that growth and development should be curtailed until the health of the awa is restored.	Include mention of 'Limits to Growth'
S63.005	Appendix 3: Definitions	General comments - definitions	Support in part	UHCC Plan Change 47 includes the Mangaroa Peatland as unstable for development. This should be reflected in Plan Change 1 to the RPS. By adopting the RAMSAR definition of a wetlands, the Mangaroa Peatland would qualify for protection and restoration.	Use the RAMSAR Convention definition to define wetlands (Article 1) as this incorporates peatlands as follows: "areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres."

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S63.008	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Conservation first must lead all future resource use decisions. Councils must 'teach', encourage and support conservation practices especially for land, water, energy.	Retain as notified.
S63.009	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	Council must empower people to create and manage their own resources, especially water and energy. This can lead to greater resilience and sense of security if people know what they are currently doing, and what they can do to change their resource use profile.	Include references to personal resource audits and other tools to raise awareness and use to create a PRMP (Personal Resource Management Plan).
S63.010	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	Rain water harvesting and storage and renewable generation must be normalised.	Retain as notified.
S63.011	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Work with Ministry of Education and NZQA to include Environmental Studies at all levels of schooling with standards for assessment on the qualifications framework .
S63.013	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	Municipal swimming pools must have roof top solar energy generation and/or solar hot water heating to reduce the high energy use for heating the water	Amend policy to require that all appropriate council owned buildings must be considered as renewable energy generation sites.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S63.014	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Municipal swimming pools must have storm water collection and storage facility, in ground, under car parks to be used to fill the pool or as emergency water supply. Municipal swimming pools must also have roof top solar energy generation and/or solar hot water heating to reduce the high energy use for heating the water.	Amend policy to require municipal swimming pools to have storm water collection and storage facilities (in ground), and under car parks and rooftop solar energy generation and/or solar hot water heating.
S63.015	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Change the building code to make rain water collection and storage tanks, meters for reticulated water, storm water for toilet flushing, on site renewable energy generation or community generation, and triple glazing in certain areas, and WOF for all septic systems in rural areas.
S63.016	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Local councils should create a new committee for Water Strategy in order to more easily draft policy at the local level.

S166 Masterton District Council

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S166 Masterton District Council					
S166.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	We support the need for a better integrated system informed by te ao Māori and mātauranga Māori. More detail is required as to how the regional and district councils will undertake this work.	Retain as notified. However Further clarity is needed to explain what this looks like in practice, and what guidance will be provided to district councils.
S166.002	Chapter 3.1A: Climate change	Objective CC.1	Support in part	Support in principle but have concerns about how this will work and affect parts of our economy and community. We can contribute, but can't at a district level, have overall responsibilities for these targets. This may be achievable in a Tier 1 Council area, but for a rural area in the Tier 3 category (NPSUD) this may not be	Retain as notified. However Further information needed to understand how this will work in practice. Do not support having district level overall responsibilities for targets.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				achievable because of the economy being reliant heavily on agriculture and transport for its survival.	
S166.003	Chapter 3.1A: Climate change	Objective CC.2	Not Stated / Neutral	Objective CC.2 is difficult to implement as a Tier 3 authority. There needs to be equity across the region in this approach.	Clarifications. Further clarity is needed for how the TA's will be expected to implement this Objective.
S166.004	Chapter 3.1A: Climate change	Objective CC.3	Support in part	Reducing greenhouse gas emissions in the region is supported. Clarification needed on what happens if targets are not met or if these targets will limit individual activity. We are currently interpreting these are regional targets rather than activity targets. This needs to be further clarified by the GWRC.	Retain as notified. However More clarity is needed to understand how provincial areas will contribute to these reductions.
S166.005	Chapter 3.1A: Climate change	Objective CC.4	Oppose in part	Will look at how this can be reflected as part of the review of the Wairarapa Combined District Plan. All councils need to ensure that they have their own nature-based solutions, and that enforcement needs to be equitable across the region.	Clarifications. All councils need to ensure that they have their own nature-based solutions, and that enforcement needs to be equitable across the region. Clarity needed on what 'integral' means in this context.
S166.006	Appendix 3: Definitions	Nature-based solutions	Support in part	Agree in principal, but guidance is needed as to what the nature based solutions to climate change will be and why they would be chosen over other types of solutions. Noting specifically, it is about better preparation for the predicted impacts of climate change, so long as the 'nature-based' solutions aren't disproportionately in the Wairarapa (Carbon Sink Mitigation).	Request a clearer definition of nature-based solutions.
S166.007	Chapter 3.1A: Climate change	Objective CC.5	Support in part	Concerns that afforestation will be used disproportionately in the Wairarapa. The Wairarapa is not an offsetting zone for the rest of the Wellington Region.	Retain as notified. However: MDC asks that it has a lead role in the development of any plans or policies relating to the increase of permanent forest in the Wellington Region, particularly in the Masterton District.
S166.008	Chapter 3.1A: Climate change	Objective CC.6	Support	Building community resilience to climate change is one of the main aims of our newly established Climate Action Plan so we are supportive of this objective.	Retain as notified. MDC requests involvement in the development of any plans or policies relating to adaptation planning, particularly in the Masterton District.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S166.009	Chapter 3.1A: Climate change	Objective CC.7	Support	Increasing public education around climate change issues and solutions is one of the main actions of our newly established Climate Action Plan so we are supportive of this objective.	Retain as notified.
S166.010	Chapter 3.1A: Climate change	Objective CC.8	Support	Support Iwi and hapū being empowered to make decisions to achieve climate-resilience in their communities. We believe this objective is an important step in enabling our Council to build a partnership approach to climate change mitigation and adaptation with mana whenua.	Retain as notified.
S166.011	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Support in part	Rathkeale College does not discharge anymore.	Amend the paragraph to read: There are eight seven major discharges of treated sewage to fresh water in the region - one from the treatment plant at Paraparaumu, one from Rathkeale College in Masterton , with the rest from the Wairarapa towns of Masterton, Castlepoint, Carterton, Greytown, Featherston and Martinborough.
S166.012	Chapter 3.6: Indigenous ecosystems	Objective 16	Support in part	Support in part (our interpretation of the Objective's intention). Oppose in part due to possible unforeseen implications for TAs roles and responsibilities which could be unaffordable for our community. What it looks like in practice could have significant consequences and costs.	Retain as notified. However: MDC requests involvement in the development of any plans or policies relating to this objective.
S166.013	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support	Support this objective	Retain as notified. However: further work is required to understand the cost implications and what affordability impacts this may have on our communities.
S166.014	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support	Agree that mana whenua / tangata whenua values are given effect to in decision making and they are supported to exercise their kaitiakitanga for indigenous biodiversity.	Retain as notified.
S166.015	Chapter 3.6: Indigenous ecosystems	Objective 16C	Support in part	Agree with proposed content, but on the proviso that this objective is not to the detriment of mana whenua/tangata whenua values as per Objective 16B.	Retain as notified. However: Further clarity required to ascertain whether this objective has any

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					impacts on Objective 16B.
S166.016	Chapter 3.8: Natural hazards	Objective 19	Support in part	Objective is very high-level.	Retain as notified. However: Further clarity would help to understand what this means for our district in practice.
S166.017	Chapter 3.8: Natural hazards	Objective 20	Not Stated / Neutral	Need to provide for impacts on the natural environment where the need for essential services or infrastructure is great. For example, protecting a communities drinking water supply. It is possible that mitigation measures to protect human life, regionally significant infrastructure, or critical facilities such as hospitals, will impact on natural values of rivers and wetlands, etc. The RPS should look at including a hierarchy whereby mitigation or protection measures that impact on natural process are provided for if the need is great.	Include hierarchy for mitigation and protection measures.
S166.018	Chapter 3.8: Natural hazards	Objective 21	Support in part	Objective is supported but more guidance needed around how this would work in practice.	Retain as notified.
S166.019	Chapter 3.9: Regional form, design and function	Objective 22	Support	The review of the WCDP will reflect this objective through areas of intensification - allowing for higher density and mixed use development.	Retain as notified.
S166.020	Chapter 3.9: Regional form, design and function	General comments - urban development	Not Stated / Neutral	Objective 22A Need further clarity on how this impacts the Wairarapa District Councils in terms of intensification, and if so - how? The review of the WCDP is proposing to intensify the residential zone (in certain areas).	Clarifications. Further clarity sought on how this will impact Tier 3 councils.
S166.021	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support in part	The Wairarapa Combined District Plan Coastal Environment Area Overlay types will remain which controls the way development is considered in the coastal environment with tighter restrictions than the receiving zone. What are the bottom lines?	Retain as notified. However: Further clarity is required: - Will this mean we can't do protection work on the coast? - Is the intent to block hard infrastructure? - If we still use hard infrastructure, how do we do it? i.e. where in the RPS is this covered? - Need to reference sea level rise and implications

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S166.022	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Not Stated / Neutral	Note that this is a significant affordability issue for our community.	Clarifications. Further clarity sought on how this will impact Tier 3 councils
S166.023	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support in part	Agree in principle - but further clarity is required regarding how this will work for Tier 3 Councils.	Retain as notified. However: further clarity is required regarding how this will work for Tier 3 Councils.
S166.024	Chapter 4.1: Regulatory policies	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support in part	Agree in principle - but how will this work for Tier 3 Councils? Please clarify.	Retain as notified. However: further clarity is required regarding how this will work for Tier 3 Councils.
S166.025	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable	Support	Agree - the review of the Wairarapa Combined District Plan will reflect this.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		energy generation - district plans			
S166.026	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Not Stated / Neutral	Further clarity sought on roles and functions with joint processing, thresholds etc. expectations around processing. Will need to be managed by both Regional and District Councils. District Councils currently being compelled by GWRC to obtain discharge consents for existing stormwater networks. We need clarity on the "roles" and "responsibilities" of the TA and Regional Council under this proposed change.	Clarifications. Further clarity sought on this Policy.
S166.027	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose in part	Policy asks TAs to manage earthworks and vegetation disturbance to achieve target attribute states. Understand under NPS-FM environmental bottom lines are required, but this Policy goes as far as to manage earthworks for driveways and retaining walls.	Provide further clarifications to address the relief sought in the submission
S166.028	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Agree that the Regional Rules need to allow for the health needs of people - but acknowledge that economic and cultural needs should be considered.	Retain as notified. However: Consider the inclusion of economic and cultural needs as well, even if it is in prioritised criteria.
S166.029	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Not Stated / Neutral	We want to see Henley Lake covered as part of this Policy, and the potential for other artificial wetlands that have ecological value to be covered.	Include artificial wetlands for protection.
S166.030	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats	Not Stated / Neutral	This is currently being looked at as part of the Wairarapa Combined District Plan review, as part of the NPS Indigenous Biodiversity.	No decision sought.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		with significant indigenous biodiversity values - district and regional plans			
S166.031	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Support in principle but it has significant implications for development in the Masterton urban area (behind stop banks). The Wairarapa Combined District Plan will take a risk-based approach to hazard planning, as covered in the Wairarapa Combined District Plan review in the Natural Hazards Chapter (including GIS mapping, zones and appropriate overlays). But the extent of the policy is unclear, and questions remain. How are the objective and methods reconciled with the national direction for urban growth and intensification? What policies, rules and evidence will be necessary to avoid legal challenge?	Retain as notified.
S166.032	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support	This is being looked at in Wairarapa Combined District Plan review.	Retain as notified.
S166.033	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	This is being looked at in Wairarapa Combined District Plan review - areas for intensification being provided.	Retain as notified
S166.034	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key	Support	Zones being reviewed as part of Wairarapa Combined District Plan review.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		industrial-based employment locations - district plans			
S166.035	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Not Stated / Neutral	No reason given for this submission point	Include District Plans which will allow for local infrastructure to support the Policy.
S166.036	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>The Wairarapa Combined District Plan will give effect to this Policy.</p> <p>See also response against Policy 29.</p> <p>[Note. This submission point reference S166.031, raising queries about How are the objective and methods reconciled with the national direction for urban growth and intensification? What policies, rules and evidence will be necessary to avoid legal challenge?]</p>	<p>Retain as notified.</p> <p>However:</p> <p>Further clarity sought on impacts to consenting pathways for stop banks.</p>
S166.037	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	We understand the Policy has been reworded since limited release to reflect that it does not restrict river protection works (structural) from happening, rather it is a consideration to understanding their potential effect on the environment.	<p>Retain as notified.</p> <p>However:</p> <p>Further clarity required regarding the extent to which we need to consider effects.</p>
S166.038	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural	Support	The contents of this policy is being considered as part of the Wairarapa Combined District Plan review.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		areas - consideration			
S166.039	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Not Stated / Neutral	Public transport in the Masterton District and throughout the Wairarapa is significantly limited in comparison to the Hutt, Wellington, and Porirua regions. We are interested in further clarity on the extent that land use can be integrated with transport.	Clarifications. Further clarity requested on how this policy can be implemented in the Wairarapa.
S166.040	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Not Stated / Neutral	Very important to have the necessary infrastructure there for any new subdivision and/or development. Difficult to sequence.	Policy is too specific. Should be broader to encourage a range of infrastructure.
S166.041	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Energy efficiency and waste minimisation are part of our Climate Action Plan so we are supportive of this policy.	Retain as notified.
S166.042	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	Agree in principle - it is being looked at in the Wairarapa Combined District Plan review. Acknowledge that targets are set as 'contributing to' the regional targets and that each district council will need to show how they contribute towards the regional target through their objectives, policies and rules i.e., when developing their objectives, policies and rules how that contributes to the overall targets. We also note that the extent that each council can contribute will differ.	Retain as notified. However: More clarity needed on what support will be provided for smaller councils to put infrastructure in place to contribute to these regional targets.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S166.043	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	Note that the travel management plans need to be reflected in our Wairarapa Combined District Plans by June 2025.	Retain as notified.
S166.044	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Not Stated / Neutral	Policy CC.4 is difficult to implement as a Tier 3 authority. There needs to be equity across the region in this approach.	Clarifications. Need clarification between Tier 1 and Tier 3 obligations
S166.045	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Not Stated / Neutral	This reads as not allowing land use intensification - is this correct? What is the intent? We would like a seat at the table for designing this regional plan. Is this going to trigger farming activity resource consent requirements? Will all farming activity need to be consented?	<ul style="list-style-type: none"> MDC asks that it is part of the design for this plan. Further clarity required to confirm whether this policy is about not allowing land use intensification and what it means for farming activity.
S166.046	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Not Stated / Neutral	More clarity on this policy is required to ensure that the Wairarapa is not the carbon sink for the greater Wellington region. Acknowledge the amendment of Method CC.4 that spatial plan to be prepared using a partnership approach. More clarity needed on who the partnership approach will be with.	MDC strongly recommends that it is involved in the development of this plan as well as relevant sector and communities.
S166.047	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change -	Support	The policy intent is supported, but there should be a corresponding non-regulatory method to develop guidance to integrate these solutions in infrastructure and development design options and assess when these solutions are and are not appropriate.	Retain as notified. However: Develop a corresponding non-regulatory method to develop guidance to support this policy.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		district and regional plans			
S166.048	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	No reason was given for this submission point	Retain as notified.
S166.049	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	Supportive in principle but would like to know how this intends to be applied to provincial areas with significant rural roading networks.	Retain as notified. However: More clarity on this policy required.
S166.050	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	Supportive in principle but would like more information on how it would work practically with some of our main trucking industries (especially stock moving and log hauling).	Retain as notified However: More clarity on this policy required.
S166.051	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment	Not Stated / Neutral	More clarity is required on this policy.	MDC asks that it is part of developing this assessment.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		- consideration			
S166.052	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Not Stated / Neutral	MDC enquire whether the intent of this policy to limit dairy farming intensification? If so, how are these communities going to be supported?	Clarifications. More clarity required regarding the policy intent with regard to dairy farming intensification.
S166.053	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Not Stated / Neutral	More information required as to how the tree canopy target will work in practice? How is it implemented, monitored and enforced? How do you maintain it?	Clarifications. More clarity needed around the tree canopy cover target.
S166.054	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Not Stated / Neutral	Is the intent of this policy to limit dairy farming intensification? If so, how are these communities going to be supported?	MDC requests involvement in the development of any RPS related policies about rural resilience to climate change.
S166.055	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	Supportive in principle of the 'right tree right place' approach. The Wairarapa should not be the carbon sink for the Greater Wellington region.	Retain as notified. However: This policy requires more clarity as it has potential significant impacts on the Wairarapa economy.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S166.056	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support in part	Agree in principle - but how will this work for Tier 3 Councils?	Retain as notified. However: Further clarity sought on how this will impact Tier 3 councils.
S166.057	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	Agree - but we need to specify how one will use this in practice. Will this hinder intensification?	Retain as notified. However: Further clarify the impacts on intensification.
S166.058	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose in part	We request clarity on the joint processing of consents (Policy FW.3, Method FW2). In particular: How is this going to work? What will trigger this process? What is the threshold? What does this look like in practice? What does this look like for iwi?	Amend clause (f) to read: (f) Integrate planning and design of stormwater management to achieve multiple improved outcomes - amenity values, recreational, cultural, ecological, climate, vegetation retention; protection of life and property
S166.059	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support in part	Acknowledge that this policy is important for future planning.	Retain as notified.
S166.060	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Not Stated / Neutral	In reference to Method 5 - How does this work in practice? How are responsibilities between TA and GWRC distributed? Joint processing - how will this work? Who will manage the process?	Clarifications. Further clarification to address the relief sought
S166.061	Chapter 4.2: Matters to	Policy UD.2: Enable	Support	Intent of this policy has been considered as part of the Wairarapa Combined District Plan review.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	be considered	Māori cultural and traditional norms - consideration		MDC is allowing for it as a permitted activity in appropriate zones.	
S166.062	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Support	[Note. This submission point refers Method 10] Energy efficiency improvements is included as part of our Climate Action Plan so the information would be useful to the work MDC is doing. We are supportive of this method.	Retain
S166.063	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Support	[Note. this submission point refers Method 11] Information about water conservation and efficient use is supported. Water resilience is included as part of our Climate Action Plan so the information would be useful for our staff to disseminate to our communities.	Retain
S166.064	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Support	[Submission point refers Method 12] Increased biodiversity and ecosystem health is part of our Climate Action Plan so the information would be useful for achieving these outcomes.	Retain
S166.065	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support	District resilience is included as part of our Climate Action Plan so the information would be useful for our staff and our communities. We are supportive of this method.	Retain as notified.
S166.066	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 17: Reducing waste and greenhouse gases emissions from waste streams	Support	Waste minimisation is included as part of our Climate Action Plan and Waste Management & Minimisation Plan so the information would be useful for our staff and our communities. We are supportive of this method.	Retain as notified.
S166.067	Chapter 4.5: Methods to implement	Method 22: Integrated hazard risk	Support	Disaster risk reduction/hazard risk management and climate change adaptation planning should already be	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	policies (non-regulatory methods)	management and climate change adaptation planning		occurring together. We are supportive of an integrated approach.	
S166.068	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Not Stated / Neutral	Further clarity is required with regard to implementation and transitional arrangements for Entity C (three waters)	Clarifications.
S166.069	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	Support	A healthy natural environment is a key tool in creating a climate resilient district so we are supportive of this method.	Retain as notified.
S166.070	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support in part	What type of assistance does this intend to provide (Financial? Education? Plants?) and who will be responsible for it?	Clarifications. More information is required about what this would look like in practice.
S166.071	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.1: Climate change education and behaviour change programme	Support	Increasing public education around climate change issues and solutions is one of the main actions of our newly established Climate Action Plan so we are supportive of this method.	Retain as notified.
S166.072	Chapter 4.5: Methods to implement policies (non-	Method CC.2: Develop carbon emissions	Support	Regional guidance on emissions offsetting opportunities and limits would be useful so we are supportive of this method.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	regulatory methods)	offsetting guidance			
S166.073	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.3: Travel demand management plans	Support	Supportive in principle but we would like to know more about how these plans will work in provincial towns/rural areas.	Retain as notified. However:MDC requests involvement in this work.
S166.074	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Support in part	MDC requests to be one of the organisations involved with preparing this plan. Plan needed to ensure that the Wairarapa isn't used as the greater region's carbon sink.	Amend the Implementation section to read: Implementation: Wellington Regional Council* and city and district councils (GWRC will co-lead with each city and district council with regard to their respective geographical areas)
S166.075	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Not Stated / Neutral		MDC requests to be part of the design for this.
S166.076	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.7: Advocating for the use of transport pricing tools	Not Stated / Neutral	Regional guidance on the use of transport pricing tools would be useful. Does this only apply to city councils?	Clarifications. More information required to understand what this looks like and what the implications are for our community.
S166.077	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-	Support in part	Supportive in principle but need to know more about how this will work in with central government and primary industry initiatives in this area.	Retain as notified. However: More information required for this method.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		non-regulatory methods			
S166.078	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Support	A healthy natural environment is a key tool in creating a climate resilient district so we are supportive of this method.	Retain as notified.
S166.079	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support in part	Regional incentives for mode shift to low-emissions transport will be key to our district contributing to lowering regional emissions.	Retain as notified. However: MDC is requesting more information on how these incentives will work in rural areas.
S166.080	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support in part	Tier 3 Councils are not required under the NPS to prepare an FDS. The Wairarapa Combined District Plan review in line with this. Need to clarify this is optional for other authorities.	Retain as notified. However: Need to clarify this is optional for other authorities.
S166.081	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Support in part	Further clarity sought on some aspects e.g. Policy FW.1	Retain as notified. However: Further clarity is required.

S143 Megan Gallagher

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S143 Megan Gallagher					
S143.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	<p>Support for policy that ensures all councils can meet housing needs without forcing people to engage in carbon emitting activities (ICE vehicles, longer commute times, living in areas with poor public transport).</p> <p>There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Support provisions being strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.</p>	<p>Consider additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.</p> <p>Amend the provisions to address the relief sought in the submission.</p>
S143.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Not Stated / Neutral	<p>If more apartments, townhouses are built with a focus on warmth, community and proximity to amenities people will buy them. Stop encouraging low density greenfield subdivisions in what was once farmers and food production areas.</p>	<p>Amend the provisions to address the relief sought in the submission.</p>
S143.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	<p>Support Councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing "density done well" by intensification. This includes supporting co-designed community development for groups wanting to build housing together in non traditional ways.</p>	<p>Amend provisions to address the relief sought in the submission.</p>

S164 Megan Lane

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S164 Megan Lane					
S164.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	<p>Support all councils ensuring that more homes don't mean more emissions. Ridiculous that traffic-inducing greenfield subdivisions of single-family detached houses are still the lion's share of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. It's important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield. Not opposed to greenfield if it's based on high accessibility, not mobility, with a sustainable movement network.</p>	<p>Retain and strengthen provisions to get good intensification for growth, rather than greenfield.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S164.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Not opposed to greenfield if it's based on high accessibility, not mobility, with a sustainable movement network.	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Support these provisions strengthened, enhanced, and made more sophisticated and more comprehensive.
S164.004	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing "density done well".
S164.005	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Provisions should be retained, refined and enhanced.
S164.006	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Provisions should be retained, refined and enhanced.
S164.007	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support provisions relating to indigenous biodiversity.	Provisions should be retained, refined and enhanced.

S100 Meridian Energy Limited

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S100 Meridian Energy Limited					
S100.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional	General comments - Chapter 3	Support in part	Proposed RPS Change #1 proposes objectives, policies and methods responding to the challenges associated with future climate change. This warrants acknowledgement of the challenges as a regionally significant issue. Infrastructure, including regionally significant infrastructure is essential in supporting communities' resilience against the effects of climate change. Infrastructure, including regionally significant infrastructure, is itself particularly vulnerable to the effects of climate change. Maintaining the functionality, integrity and adaptability of infrastructure will be key to achieving community resilience to the challenges of climate change.	Insert into the overview of issues the following additional issue numbered '4' (or words that have similar effect): "The overarching resource management issues for the Wellington Region are: 1. 2. 3. 4. The region's environment, communities and infrastructure are vulnerable to future national and global challenges associated with climate change. Climate change is expected to exacerbate flood

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	Policy Statement			Enabling the upgrading, adaptation and relocation of regionally significant infrastructure will support community resilience.	hazard, including coastal inundation, and drought conditions. The effects of climate change, including coastal and river flood inundation and erosion, are expected to damage or impair the operation of infrastructure (including regionally significant infrastructure). Community resilience to the effects of climate change will depend on the functionality, integrity and adaptability of infrastructure. Regionally significant infrastructure will need to be upgraded and adapted or relocated to maintain the necessary functionality and capacity to support community resilience."
S100.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	The expression 'Te Ao Māori' is not defined for the purposes of Objective A and it is not clear what guidance it will provide (or require). Clauses (a) to (f) emphasise the importance of, and need to protect, the natural environment. The RPS needs to do more than just 'recognise' the dependence of humans on the natural environment. The RPS needs to provide guidance for the development of natural resources where development is necessary to sustain communities and support community resilience. In particular, the RPS should provide clear guidance on the importance of maintaining, upgrading and adapting or relocating regionally significant infrastructure where this is necessary to support community resilience. There is a gap in Objective A in this respect. There is also potential duplication between the requirements in clauses (a) to (c) and the reference to Te Ao Māori.	Insert into proposed Objective A an additional consideration (e) as follows (or words that have similar effect) and re- number the following considerations sequentially: Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (a) incorporates mātauranga Māori; and (b) recognises ki uta ki tai - the holistic nature and interconnectedness of all parts of the natural environment; and (c) protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and (d) recognises the dependence of humans on a healthy natural environment; and (e) enables use and development of natural and physical resources to support the infrastructure (including regionally significant infrastructure) necessary to strengthen the resilience of communities to meet the future challenges associated with climate change; and (f) recognises the role of both natural and physical resources in providing for the characteristics and qualities of well-functioning urban environments; and (g) responds effectively to the current and future pressures

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					of climate change, population growth and development.
S100.003	Chapter 3.1A: Climate change	Issue 1: Greenhouse gas emissions must be reduced significantly, immediately and rapidly	Support in part	The statement of issues is correct: there is an urgent need to significantly and rapidly reduce greenhouse gas emissions. This need, and the urgency of it, is emphasised at multiple points throughout the proposed RPS Change #1 amendments. RPS Change #1 also discusses, at multiple points, the importance and urgency of transition away from fossil fuel dependency to reliance on energy generated from renewable sources. However, RPS Change #1 fails to provide the support necessary to enable the necessary transition to renewable energy for the economy, transport network, people and communities. If the urgent and rapid transition sought by RPS Change #1 is to be achieved, strong guidance is necessary in the RPS about what that means in terms of increased renewable electricity generation capacity. The RPS, and the district and regional plans that give effect to the RPS, need to actively enable additional renewable electricity generation if progress towards the targets proposed by RPS Change #1 are to be achieved. All regions, cities and districts including Wellington Region and its will need to contribute to increasing renewable electricity generation if national targets and a nationwide transition to reliance on renewable energy sources are to be achieved.	Amend the issue to read: "1. Greenhouse gas emissions must be reduced significantly, immediately and rapidly Immediate, rapid, and large scale reductions in greenhouse gas emissions are required. ... and stationary energy (18 percent). Development of the renewable energy resources available in the region will be necessary to assist the transition from fossil fuel dependency and reduce greenhouse gas emissions"
S100.004	Chapter 3.1A: Climate change	Objective CC.1	Support in part	Objective CC.1 needs to apply to all types and scales of infrastructure (including local infrastructure and regionally significant infrastructure). As a component of regionally significant infrastructure, well planned additional renewable electricity generation is central to achieving the transition from fossil fuel dependency to reliance on renewable energy sought by RPS Change #1.	Insert explicit reference to 'regionally significant infrastructure' (a defined term in the operative RPs) into clause (c) of objective CC.1: By 2050, the Wellington Region is a low- emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of: (a) sustainable air, land, freshwater, and coastal management, (b) well-functioning urban environments and rural areas, and (c) well-planned infrastructure (including regionally significant infrastructure) .
S100.005	Chapter 3.1A: Climate change	Objective CC.3	Support in part	Achievement of the proposed reduction targets will only be achieved if there are additional renewable electricity supplies available ready and available for the transport, agriculture, industrial and other sectors to access ahead of the deadline dates. The RPS has an important role to	Insert into Objective CC.3 text (as follows or similar) to clarify that additional renewable electricity generation will also be required to facilitate reduction in reliance on fossil fuels by the dates proposed: "To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture,

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				<p>play in signalling the need for additional renewable electricity generation and in leading a RMA policy framework that enables additional renewable electricity generation to make the transition.</p> <p>The baseline date in clause (a) differs from the dates in sub- clauses (i) to (iii) and this may be an error.</p>	<p>stationary energy, waste, and industry in the Wellington Region are reduced and additional renewable energy resources are developed to:</p> <p>(a) By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions by 2030 compared with from 2018 2019 levels, including a:</p> <p>(i) 35 percent reduction from 2018 levels in land transport-generated greenhouse gas emissions, and</p> <p>(ii) 40 percent increase in active travel and public transport mode share from 2018 levels, and</p> <p>(iii) 60 percent reduction in public transport emissions, from 2018 levels, and</p> <p>(b) By 2050, to achieve net-zero emissions by 2050.</p>
S100.006	Chapter 3.1A: Climate change	Objective CC.6	Support in part	It is not only the resilience of communities and the natural environment that need strengthened resilience against the adverse effects of climate change. Infrastructure, including regionally significant infrastructure is particularly vulnerable to climate change effects and represents considerable financial investment that is critical to the resilience of communities. It warrants explicit mention in Objective CC.6.	Insert into Objective CC.6 reference to infrastructure, including regionally significant infrastructure: "Resource management and adaptation planning increase the resilience of communities, infrastructure (including regionally significant infrastructure) and the natural environment to the short, medium, and long-term effects of climate change."
S100.007	Chapter 3.1A: Climate change	Objective CC.7	Support in part	Objective CC.7 will add value to the RPS if it supports initiatives that not only highlight the impacts of climate change, but also what people and communities need to do to respond to the challenges of climate change.	Insert into Objective CC.7 the following text (or similar): "People and businesses understand what climate change means for their future and the changes that need to be made to respond to the challenges of climate change and are actively involved in planning and implementing appropriate mitigation and adaptation responses."
S100.008	Chapter 3.3: Energy, infrastructure and waste	Energy, infrastructure and waste introductory text	Support	The eighth paragraph of the chapter introduction has been superseded by events and is out of date.	Confirm the proposed deletion
S100.009	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems introductory text	Support in part	The RPS should refer to 'indigenous' biodiversity and 'indigenous' ecosystems. Here, and throughout proposed RPS Change #1, if changing the text in relation to wetlands, the opportunity should be taken to (more	Amend the text of the introduction as follows (or similar) and, throughout RPS Change #1 change 'native' to 'indigenous' when referring to indigenous biodiversity and ecosystems and insert 'natural' wetlands:

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				<p>accurately) describe the issue as relating to natural wetlands. It is not so much the 'conservation status' that needs to be improved, but the ecological integrity of significant remnant indigenous biodiversity. Also, the RMA requires the protection of significant areas of indigenous biodiversity from inappropriate subdivision, use and development.</p>	<p>"...Human actions that continue to impact on the remaining indigenous ecosystems include:</p> <ul style="list-style-type: none"> • Modification and, in some cases, destruction of ecosystems by pest plants and animals grazing animals and clearance of indigenous vegetation • Contamination of aquatic ecosystems by sediment, pollutants and nutrients • Destruction of ecosystems as a result of development • Modification of natural waterways, such as draining natural wetlands and channelling, constraining or piping of natural waterways rivers and streams • Contamination of coastal ecosystems by stormwater and sewage discharges <p>Although New Zealand has an However, there is still much work to be done to protect and improve the ecological integrity conservation status of many remnant indigenous ecosystems and habitats of indigenous faunal native ecosystems and species. The restoration of indigenous ecosystems on public, iwi and private land provides both public and private benefit.</p> <p>...</p> <p>The indigenous ecosystems most reduced in extent are specifically:</p> <p>(a) natural wetlands ... "</p>
S100.010	Chapter 3.6: Indigenous ecosystems	Objective 16	Oppose in part	Enhancement and restoration will not be the only, or the appropriate, response in all situations.	Amend Objective 16 in the following (or similar) manner: "Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are maintained protected and, where appropriate, are enhanced, and restored to a healthy functioning state."

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S100.011	Chapter 3.6: Indigenous ecosystems	Objective 16A	Oppose in part	Objective 16 seeks to protect (and, where appropriate enhance and restore) significant indigenous ecosystems and habitats. Objective 16A seeks to maintain other (non-significant) indigenous ecosystems. As with Objective 16, enhancement and restoration will not be the only or appropriate response in all situations and the wording should reflect this. Also, the last part of the objective is not necessary because a 'healthy functioning state' will have resilience against the pressures described. Improving resilience and giving effect to Te Rito o te Harakeke should be addressed by proposed policies that set out how the 'maintain' and 'enhance' outcome is to be achieved (and, in large measure the policies already do this). It seems incongruent that improving resilience should be a desired outcome for non- significant indigenous ecosystems and habitats, but is not a desired outcome for significant indigenous ecosystems and habitats.	Amend Objective 16A as follows (or in a similar manner to achieve the same effect): "The region's indigenous ecosystems are maintained and, where appropriate , enhanced, and restored to a healthy functioning state., improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke. "
S100.012	Chapter 3.9: Regional form, design and function	Objective 22	Support	Support clause (f) of Objective 22. The transition to a low-emission economy is essential of New Zealand is to achieve its climate change goals.	Retain Objective 22 as amended by RPS Change #1 and, in particular, proposed clause (f).
S100.013	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Oppose	This part of the operative explanation remains relevant. The protection required by the RMA is against inappropriate (not appropriate) use and development.	Reinstate part of the deleted text and insert reference to the words of s. 6 (a) of the RMA as follows (or in a similar manner to achieve the same effect): "Section 6 (a) of the Resource Management Act requires that the preservation of the natural character of the coastal environment must be recognised and provided for and protected from inappropriate use and development. The Resource Management Act does not preclude appropriate use and development in the coastal environment."
S100.014	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure	Oppose in part	At a regional scale, the benefits of all infrastructure are relevant (not just 'low and zero carbon regionally significant infrastructure'). Also, the expression 'low and zero carbon regionally significant infrastructure' is not a defined term in the RPS and it is not necessary to use this expression. Renewable electricity generation is, by definition in the RPS, a subset of regionally significant infrastructure.	Policy 7: Enabling the reduction in reliance on fossil fuels and Rrecognising the benefits from of renewable energy and regionally significant infrastructure including renewable electricity generation - regional and district plans District and regional plans shall include policies and/or methods that recognise :

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		e - regional and district plans		<p>To give effect to Objectives CC.1 and CC.3, and other objectives of the RPS, Policy 7 needs to explicitly enable the development of additional renewable energy to facilitate the transition from fossil fuel dependence to reliance on renewable energy. It is not enough that the proposed amendments to Policy 11 enable the development of domestic and small scale renewable electricity generation. The RPS needs to enable all scales of renewable electricity generation, if the outcomes sought by RPS Change #1 are to be achieved.</p> <p>As a consequence, the title of Policy 7 will need amendment to match the amended text of the policy.</p> <p>Text amendments are also necessary to rationalise the structure and grammar of the policy.</p>	<p>(a) recognise and enable the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including:</p> <p>(i) the ability for people and goods to can travel to, from and around the region efficiently and safely using a range of travel modes, including travel modes that do not rely on fossil fuels;</p> <p>(ii) the contribution of regionally significant infrastructure to the transition from fossil fuel dependence to reliance on renewable energy and in ways that support transitioning to low or zero carbon multi-modal travel modes;</p> <p>(iii) the public health and safety benefits of providing is maintained through the provision of essential services: including the supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</p> <p>(iv) the economic, social and cultural well-being derived from people have having access to energy generated from renewable sources, and preferably low or zero carbon energy, so as to meet their needs; and</p> <p>(v) people have access by people and communities to telecommunication services.</p> <p>(b) recognise and enable the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</p> <p>(i) reduced dependence on fossil fuels and imported energy resources and the contribution to transitioning to a low emission economy;</p> <p>(ii) enhanced security of supply and diversification of our energy sources; and (iii) reducing dependency on imported energy resources; and</p> <p>(iv) reducing reduced greenhouse gas emissions.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>Explanation Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits both within and outside the region, in particular if regionally significant infrastructure is a low or zero carbon development. Energy generated from renewable energy resources and regionally significant infrastructure can provide benefits both within and outside the region. Renewable energy benefits are not only generated by large scale renewable energy projects but also smaller scale projects. Objectives CC.1 and CC.3 cannot be achieved without a substantial increase in the amount of energy generated from renewable sources, including in the Wellington Region. Renewable energy means energy produced from solar, wind, hydro, geothermal, biomass, tidal wave and ocean current sources. Renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community but also have functional and operational needs that constrain their location options. Typically, large renewable energy generation and regionally significant infrastructure facilities, by their very nature, cannot be established without causing some level of environmental effects. Consideration of local and regional benefits, functional and operational need and adverse effects need to be considered on a case by case basis to determine what is appropriate in any particular circumstances.</p>

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S100.015	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	The RPS needs to enable all scales of renewable electricity generation, if the outcomes sought by RPS Change #1 are to be achieved.	Retain as notified.
S100.016	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	The reason for inclusion of some habitats, ecosystems and species in Appendix 1A is not clear. The section 32 report does not make a case for a requirement for a minimum +10% gain in biodiversity. The proposed requirement is premature, pending gazettal of the National Policy Statement for Indigenous Biodiversity (currently under development). The exposure draft of the NPS signalled a 'net gain' approach but did not specify a minimum proportion of gain. The provisions of the proposed Natural Resources Plan on this point were settled, in early 2022, following mediation and the agreed outcome was a 'no net biodiversity loss' outcome. The proposed amendments to RPS Policy 24 undo the valuable work done through mediation of the PNRP appeals and are not supported by a robust s. 32. evaluation. Until clear guidance is provided by a gazetted NPS, the RPS should adopt the settled approach of the PNRP. The settled provisions of Schedule G2 of the PNRP include a definition of 'no net biodiversity loss' which could usefully be included in the RPS.	Delete clause (c); and Delete clause (d) or, in the alternative, replace clause (d) with a requirement for at least no net loss (and preferably a net gain) as follows (or similar) and amend the explanation to match the policy amendments: "By 30 June 2025, Ddistrict and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development. Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall: (a) ... (b) ... (c) ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation); (d) require that the outcome sought from the use of biodiversity offsetting is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit. achieves at least no net loss and preferably a net gain of biodiversity. Explanation Policy 24 applies to provisions in regional and district plans. The policy provides clarity about the limits to, and expected

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					<p>outcomes from, biodiversity offsetting and biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values. Ecosystems and species known to meet the criteria in clauses (a and b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation). Calculating a 10 percent net biodiversity gain (offsetting) or a 10 percent net biodiversity benefit (compensation) employs the same or a similar calculation methodology used to determine 'no net loss or preferably net gain' under a standard offsetting approach. The distinction between 'net gain' and 'net benefit' is to recognise that the outcomes achievable through the use of offsetting and compensation are different. An offsetting 'net biodiversity gain' outcome is expected to achieve an objectively verifiable increase in biodiversity values while a compensation 'net biodiversity benefit' outcome is more subjective and less preferable.'</p>
S100.017	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Oppose	There are so many expressions within Policy IM.2 that are ambiguous or undefined (for example: 'equitable', 'inclusive', 'historic grievances', 'existing inequities', 'environmental issues', 'burden') that the policy is incapable of reasonable or consistent application. Policy IM.2 is not supported by any meaningful section 32 evaluation.	Delete Policy IM.2 and the accompanying explanation.
S100.018	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure -	Support in part	Many of the proposed amendments set out in proposed RPS Change #1 seek to hasten the transition from an economy that is dependent on fossil fuels and generates greenhouse gas emissions. Proposed RPS Change #1 focuses on reducing fossil fuel dependence and reducing greenhouse gas emissions but is silent on how the fossil fuel is to be replaced in the transition towards a low emissions economy reliant on renewable energy. The result is a suite of policies that only address part of the issue. This shortcoming could be overcome (in part) by including policy support for the use and development of	Amend Policy 39 and the accompanying explanation to support use and development of renewable energy to assist the transition from fossil fuel dependence towards a low emission economy based on renewable energy as follows (or similar to achieve a similar outcome): "Policy 39: Recognising Promoting and enabling the benefits from renewable energy and regionally significant infrastructure - consideration When considering an application for a resource consent, notice of requirement or a change, variation or review of a

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration		renewable energy which. generating Policy 39 is an opportunity to complement the other proposed amendments to the RPS and genuinely facilitate the transition to a low emissions economy reliant on renewable energy.	<p>district or regional plan, particular regard shall be given to:</p> <p>(a) promoting and enabling the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it it contributes to reducing dependence on fossil fuels and potential greenhouse gas emissions; and</p> <p>(b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and</p> <p>(c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and</p> <p>(d) significant wind, solar and marine renewable energy resources within the region.</p> <p>Explanation Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions. The benefits of energy generated from renewable energy resources include:</p> <ul style="list-style-type: none"> • Security of and the diversification of New Zealand's energy sources • Reducing dependency on fossil fuels and imported energy resources - such as oil, natural gas and coal • Contributing to the transition to a low emissions economy • Reducing greenhouse gas emissions <p>The benefits are not only generated by large scale renewable energy projects but also smaller scale, distributed generation projects. The benefits of regionally significant infrastructure include:</p> <ul style="list-style-type: none"> • People and goods can efficiently and

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					<p>safely move around the region, and to and from• Public health and safety is maintained through the provision of essential services - such as potable water and the collection and transfer of sewage or stormwater• People have access to energy to meet their needs• People have access to telecommunication services Energy generation from renewable energy and regionally significant infrastructure (as defined in Appendix 3) can provide benefits both within and outside the region. Renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community but also have functional and operational needs that constrain their location options. Typically, large renewable energy generation and regionally significant infrastructure facilities, by their very nature, cannot be established without causing some level of environmental effects. Consideration of local and regional benefits, functional and operational need and adverse effects need to be considered on a case by case basis to determine what is appropriate in any particular circumstances.</p>
S100.019	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems -	Support in part	The focus of Policy 40 should be on the significant values of the rivers and lakes. If changing the text in relation to wetlands, the opportunity should be taken to correct the expression to 'natural wetlands'.	<p>Amend clause (h) as follows (or similar): When considering an application for a regional resource consent, particular regard shall be given to:</p> <ul style="list-style-type: none"> (a) ... (b) ... (c) ... (d) ... (e) ... (f) ... (g) ... (h) protecting the values of rivers and lakes that

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration			<p>have significant indigenous ecosystems and aquatic habitats with significant indigenous biodiversity values of rivers and lakes, including those listed in Table 16 of Appendix 1;</p> <p>...</p> <p>...</p> <p>(m) discouraging restricting stock access to estuaries rivers, lakes and natural wetlands; and</p> <p>(n) discouraging avoiding the removal or destruction of indigenous wetland plants in natural wetlands.</p>
S100.020	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The proposed amendments convert the operative 'minimise' approach into an 'avoid' policy without specifying the threshold standard. The proposed amendments are therefore premature and cannot be properly evaluated for the purpose of section 32 because the key input for the evaluation is missing - i.e. the value of the suspended sediment standard.	<p>Delete the following proposed amendments to Policy 41 and restore the operative wording as follows:</p> <p>Policy 41: Controlling Minimising the effects of earthworks and vegetation disturbance - consideration When considering an application for a resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by to minimise: (a) erosion; and</p> <p>(b) considering whether the activity will achieve environmental outcomes and target attribute states; silt and sediment runoff into water, or onto or into land that may enter water, so that healthy aquatic ecosystems are sustained. ; and (c) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met. Explanation</p> <p>An area of overlapping jurisdiction between Wellington Regional Council and district and city councils is the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on erosion prone land in rural areas and many small scale earthworks in urban areas - such as driveways and retaining walls - can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to minimise erosion and silt</p>

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					and sedimentation effects associated with these activities. Minimisation requires effects to be reduced to the extent reasonably achievable whilst recognising that erosion, siltation and sedimentation effects can not always be completely avoided.
S100.021	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The focus of the RPS should be on 'natural' wetlands.	Amend Policy 47 by referring to 'natural wetlands' as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity values, and in determining whether the proposed activity is inappropriate particular regard shall be given to: (a) ... (b) ... (c) managing natural wetlands for the purpose of aquatic ecosystem health, recognising the wider benefits, such as for indigenous biodiversity, water quality and holding water in the landscape; (d) ...
S100.022	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	Policy 65 addresses some, but not all, of the issues. To respond to the regionally significant issues identified in relation to fossil fuel dependence and the aim of transitioning to a low emission economy reliant on renewable energy, the RPS needs to include positive support for optimising the efficiency of use of renewable energy sources for electricity generation (which includes increasing generation capacity).	Amend Policy 65 by inserting a clause that seeks to increase the proportion of electricity generated from renewable sources as follows (or similar) and insert explanatory text and renumber the following clauses sequentially: To support and encourage conservation and efficient use of resources by: (a) applying the 5 Rs (Reduce, Reuse, Recycle, Recover, and Residual waste management); (b) reducing organic waste at source from households and commercial premises; (c) increasing the diversion of wastewater sludge from wastewater treatment plants before deposition to municipal landfills; (d) requiring efficient municipal landfill gas systems; (e) increasing the proportion of electricity generated from renewable sources; (f) using water and energy efficiently; and (g) conserving water and energy. Explanation

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					Policy 65 promotes the efficient use of resources to reduce emissions and supports the expansion of electricity generation from renewable sources to assist the transition from fossil fuel dependence. The policy endorses the waste hierarchy and also promotes similar principles for efficient water and energy use.
S100.023	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support	Meridian wishes to record its interest in being a partner in establishing, supporting and promoting incentives for the uptake of zero and low-carbon transport initiatives.	Retain Method CC.10
S100.024	Appendix 3: Definitions	Climate change mitigation	Support in part	The focus of RPS Change #1 is on reduction of emissions but that is only part of the solution. The complete solution will require a mix of reduction and replacement of energy sources.	Amend the definition of 'climate change mitigation' to include positive actions that assist to reduce greenhouse gas emissions (including using and developing renewable energy) as follows or similar: Human actions to reduce emissions by sources or enhance removals by sinks of greenhouse gases. Examples of reducing emissions by sources include walking instead of driving, or replacing a coal boiler with a renewable electric-powered one, or developing additional renewable energy sources to assist the transition to a zero emissions regional economy and reducing reliance on fossil fuels. Examples of enhancing removals by sinks include growing new trees to absorb carbon, promoting and providing for active transport, and increasing public transport services and affordability.
S100.025	Appendix 3: Definitions	Large scale generators	Support in part	The requested insertion will avoid the perverse outcome that generators fuelled by renewable electricity are discouraged by policies that should be targeting fossil fuel use.	Amend the definition of 'large scale generators' to clarify that it is the burning of fossil fuel that is of concern, as follows: Any boiler, furnace, engine or other device designed to burn fossil fuel for the primary purpose of energy production having a net heat or energy output of more than 40kW, but excluding motor vehicles, trucks, boats and aircraft. This definition

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					excludes domestic fires.
S100.026	Appendix 3: Definitions	Maintain /maintained /maintenance: (in relation to indigenous biodiversity)	Oppose in part	Restoration and enhancement infer improvement, rather than maintenance. The need for and appropriateness of restoration or enhancement should be addressed in the relevant policies.	Delete the reference to restoration and enhancement in the last paragraph: (a) the size of populations of indigenous species (b) indigenous species occupancy across their natural range (c) the properties and function of ecosystems and habitats (d) the full range and extent of ecosystems and habitats (e) connectivity between and buffering around, ecosystems (f) the resilience and adaptability of ecosystems. The maintenance of indigenous biodiversity may also require the restoration or enhancement of ecosystems and habitats.
S100.027	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Oppose in part	The justification for inclusion of some of the items in proposed Appendix 1A is unclear.	Delete Appendix 1A
S100.028	Appendix 3: Definitions	Regionally significant infrastructure	Support	The definition is appropriate to support the proposed objectives, policies and methods.	Retain the fifth bullet unchanged: 'facilities for the generation and/or transmission of electricity where it is supplied to the National grid and/or the local distribution network'.
S100.029	General comments	General comments - overall	Not Stated / Neutral	Tables 1A, 3, 4, 6 (a) and 9. Some amendments may be necessary where changes are made to the titles of policies and methods.	Amend the titles of the policies and methods referred to in Tables 1A, 3, 4, 6(a) and 9 where necessary to reflect any amendments made as a result of the foregoing submission points 1 to 28.

S153 Meta Beyers

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S153 Meta Beyers					

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S153.001	General comments	General comments - overall	Support	Buildings, streets, roads, parks etc will be there for decades, and how well they're done will profoundly limit (or enable) the people who live there. "Behaviour change" can't do anything meaningful when the entire landscape is pushing against it. Future development and growth should make it possible for people to change their car dependency and live a productive, well-connected life.	Retain as notified.

S50 Michael Kennedy

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S50 Michael Kennedy					
S50.001	General comments	General comments - overall	Oppose	Cars are not the problem its petrol and diesel cars that's the problem.	Withdraw RPS Change 1.

S152 Michelle Ducat

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S152 Michelle Ducat					
S152.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support development rules that ensure any investment in infrastructure will also ensure low/zero emissions, enhances the wellbeing of people and the environment and is climate resilient. All our infrastructure dollars have to be spent wisely to ensure we are giving our communities the best chance to live lives in communities that can thrive. People need homes, but they also need community and community infrastructure that is not centred on private vehicle ownership.	Housing development must be centred on mitigation of emissions, adaptation to climate change, and enhancement of community connection and the environment we depend upon - and centres on the the aspirations of mana whenua.
S152.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support councils ensuring more homes do not mean more emissions. It's ridiculous that in this day and age, traffic-inducing greenfield subdivisions of single-family detached houses are still the lion's share of new homes being built. There are plenty of reasons why it's easier and more	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.

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				profitable to do traditional car-centric suburban greenfield. That is why it is important for councils - of all stripes - to do everything they possibly can to get good intensification for growth, rather than greenfield.	
S152.005	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other options to TDM plans - provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S152.006	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Councils' planning, regulatory and consenting teams be boosted and upskilled to become more comfortable and confident at doing "density done well" by intensification.
S152.007	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Provisions should be retained, refined and enhanced.
S152.008	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support provisions relating to climate-resilient urban areas.	Provisions should be retained, refined and enhanced.
S152.009	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support provisions relating to indigenous biodiversity.	Provisions should be retained, refined and enhanced.

S133 Muaūpoko Tribal Authority

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S133 Muaūpoko Tribal Authority					
S133.001	General comments	General comments - overall	Oppose in part	Historical evidence indicates in several instances that Muaūpoko iwi has strong ancestral and historical connections to Te-Whanganui-a-Tara. Muaūpoko's traditional rohe includes Te Whanganui-a-Tara on the Kāhui Māngai site which represents the area over which Muaūpoko exercises kaitiakitanga for the purposes of the RMA.	Acknowledge Muaūpoko connection with Te-Whanganui-a-Tara throughout the RPS in any relevant provisions or introductory text.
S133.002	Chapter 3: Resource management issues, objectives	Overarching Objective A	Support in part	Supports the intent of the objective, particularly the reference to integrated management being guided by te ao Māori and incorporating mātauranga Māori. However, request specific acknowledgement of Muaūpoko as having connection to Te-Whanganui-a-Tara.	Amend the objective to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is acknowledged.

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	and summary of policies and methods to achieve the objectives in the Regional Policy Statement				
S133.003	General comments	General comments - overall	Oppose in part	There are several grammatical and sentence structure errors throughout the plan change. Requests that GWRC undertake a general sense and grammar check throughout the plan to ensure amendments are robust and reflect the intent of changes.	A general grammar and sense check is undertaken to reflect the intent and produce desired outcomes from Plan Change 1.
S133.004	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose	As currently drafted, the freshwater provisions do not adequately incorporate the local expressions of Te Mana o te Wai. A thorough review of the provisions needs to be undertaken to ensure the expressions are reflected accurately and appropriately, and achieve the desired outcomes for iwi and the region.	All freshwater provisions need to be reconsidered and updated to better incorporate Te Mana o te Wai expressions and include Muaūpoko values, attributes and outcomes.
S133.005	Chapter 3.4: Fresh water (including public access)	Objective 12	Oppose in part	<p>While the intent of the objective is supported, as currently drafted, it does not adequately incorporate mana/tangata whenua expressions of Te Mana o te Wai. Would like the opportunity to provide an expression of Te Mana o te Wai - this may be added to other iwi expressions.</p> <p>Do not consider it necessary to repeat principles in the RPS. The objective should be a local expression of Te Mana o te Wai, not repeat the NPS. The objective should also be clear that Muaūpoko has a connection to the area, alongside other iwi in the region.</p>	Amend the objective and incorporate local expressions into other parts of the plan to better express the elements of Te Mana o te Wai. AND Remove simple repetition of the NPSFM 2020, including the six principles.
S133.006	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Oppose in part	<p>Supports the intent of this policy, particularly the partnership directive with mana whenua/tangata whenua. However, there are several amendments required to ensure it gives effect to Te Mana o te Wai and the NPSFM 2020. Long-terms visions and FMUs should be set out in the RPS, not the Regional Plan. Does not agree that whitua are appropriate areas to identify freshwater management units.</p> <p>The NPSFM section 3.8 (3) also requires regional councils to identify (if present):</p> <ul style="list-style-type: none"> • sites to be used for monitoring • primary contact sites 	Amend the RPS to: <ul style="list-style-type: none"> • clarify the process identify FMUs • provide a policy or method to identify and define FMUs • provide a policy or method to identify (if present): sites to be used for monitoring, primary contact sites, the location of habitats of threatened species, outstanding water bodies, and natural inland wetlands. <p>Ensure Muaūpoko is given the opportunity to partner with GWRC for these processes.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<ul style="list-style-type: none"> • the location of habitats of threatened species • outstanding water bodies • natural inland wetlands. 	
S133.007	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S133.008	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S133.009	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S133.010	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S133.011	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		and well-being of water bodies and freshwater ecosystems - consideration			
S133.012	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S133.013	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S133.014	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S133.015	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.

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		conservation of resources - non-regulatory			
S133.016	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support in part	Requests a process for co-designing a regional and local expression of Te Rito o te Harekeke with iwi to give effect to clause 3.2 of the exposure draft of the NPSIB (once gazetted).	Include a policy, or method, or both, providing for the development of a regional and local expression of Te Rito o Te Harekeke, to be codesigned with tangata whenua, including Muaūpoko
S133.017	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support in part	Supports the maintenance, enhancement and restoration of indigenous ecosystems and the acknowledgement of the roles of tangata whenua, including Muaūpoko and landowners.	Include specific reference to Muaūpoko's relationship with indigenous ecosystems. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S133.018	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support in part	Supports the maintenance, enhancement and restoration of indigenous ecosystems and the acknowledgement of the roles of tangata whenua, including Muaūpoko and landowners.	Include specific reference to Muaūpoko's relationship with indigenous ecosystems. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S133.019	Chapter 3.6: Indigenous ecosystems	Objective 16C	Support in part	Supports the maintenance, enhancement and restoration of indigenous ecosystems and the acknowledgement of the roles of tangata whenua, including Muaūpoko and landowners.	Include specific reference to Muaūpoko's relationship with indigenous ecosystems. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S133.020	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Supports the inclusion of a deadline for completion of indigenous biodiversity identification. However, we request consultation with Muaūpoko be included.	Include process for consultation with Muaūpoko.
S133.021	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant	Support	Supports acknowledgement of the limits to offsetting.	Retain as notified. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te-Whanganui-a-Tara is recognised.

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		indigenous biodiversity values - consideration			
S133.022	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	Supports the requirement to partner with mana whenua/tangata whenua, but request that Muaūpoko are also recognised.	Recognise Muaūpoko as also having connection to indigenous biodiversity in Te-Whanganui-a-Tara. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te Whanganui-a-Tara is recognised.
S133.023	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support in part	Supports the requirement to partner with mana whenua/tangata whenua, but request that Muaūpoko are also recognised.	Recognise Muaūpoko as also having connection to indigenous biodiversity in Te-Whanganui-a-Tara. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te Whanganui-a-Tara is recognised.
S133.024	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	Supports the requirement to partner with mana whenua/tangata whenua, but request that Muaūpoko are also recognised.	Recognise Muaūpoko as also having connection to indigenous biodiversity in Te-Whanganui-a-Tara. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te Whanganui-a-Tara is recognised.
S133.025	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and	Support in part	Supports the requirement to partner with mana whenua/tangata whenua, but request that Muaūpoko are also recognised.	Recognise Muaūpoko as also having connection to indigenous biodiversity in Te-Whanganui-a-Tara. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te Whanganui-a-Tara is recognised.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		communities in the management of indigenous biodiversity - non-regulatory			
S133.026	Chapter 3.1A: Climate change	Climate change introductory text	Support	In regard to regionally significant issue, point 5, Supports the acknowledgement of the threat climate change poses to Māori well-being.	Retain as notified.
S133.027	Chapter 3.1A: Climate change	Objective CC.1	Support	Supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S133.028	Chapter 3.1A: Climate change	Objective CC.2	Support	Supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S133.029	Chapter 3.1A: Climate change	Objective CC.3	Support	Supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S133.030	Chapter 3.1A: Climate change	Objective CC.4	Support	Supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S133.031	Chapter 3.1A: Climate change	Objective CC.5	Support	Supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S133.032	Chapter 3.1A: Climate change	Objective CC.6	Support	Supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S133.033	Chapter 3.1A: Climate change	Objective CC.7	Support	Supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised
S133.034	Chapter 3.1A: Climate change	Objective CC.8	Support in part	Supports the intent of this policy, but would like to see it extend to taonga and wāhi tapu sites. Establish a process for Muaūpoko to describe and communicate what taonga and wāhi tapu sites are important to them.	Amend the objective to include taonga and wāhi tapu sites. A process is set for Muaūpoko to be able to describe and communicate what taonga and wāhi tapu sites are important to them.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S133.035	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.036	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	MTA supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.037	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.038	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.039	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.040	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans			
S133.041	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.042	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.043	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions -	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration			
S133.044	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.045	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.046	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.047	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions -	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration			
S133.048	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.049	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.050	Chapter 4.4: Non-regulatory policies	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.051	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tara is recognised.
S133.052	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai -	Support	Supports the inclusion of policies that reflect requirements for integrated management.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration			
S133.053	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Support	Supports the inclusion of policies that reflect requirements for integrated management.	Retain as notified.
S133.054	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Support the inclusion of this policy.	Retain as notified.
S133.055	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
S133.056	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		infrastructure - regional and district plans			
S133.057	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
S133.058	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
S133.059	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
S133.060	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequenc	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		es of natural hazards - consideration			
S133.061	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
S133.062	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
S133.063	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	Supports the acknowledgement of home ownership and access to affordable housing being exacerbated for Māori, however, requests specific mention of Muaūpoko.	Amend to include specific reference of Muaūpoko.
S133.064	Chapter 3.9: Regional form, design and function	Issue A: Lack of housing	Support	Supports the acknowledgement of specific issues faced by iwi regarding urban development, including lack of variety of housing, inappropriate development effects on mana whenua and how poor-quality urban design can adversely affect cultural practices.	Retain as notified.
S133.065	Chapter 3.9: Regional form, design and function	Issue B: Inappropriate development	Support	Supports the acknowledgement of specific issues faced by iwi regarding urban development, including lack of variety of housing, inappropriate development effects on mana whenua and how poor-quality urban design can adversely affect cultural practices.	Retain as notified.
S133.066	Chapter 3.9: Regional form, design and function	Issue 1: Poor quality urban design	Support	Supports the acknowledgement of specific issues faced by iwi regarding urban development, including lack of variety of housing, inappropriate development effects on mana whenua and how poor-quality urban design can adversely affect cultural practices.	Retain as notified.
S133.067	Chapter 3.9: Regional form, design and function	Objective 22	Support	Supports the amendments to this clause to support the ability for Māori to express their cultural and traditional norms.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S133.068	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support	Supports the strengthening of these policies to give effect to the NPSUD 2020.	Retain as notified.
S133.069	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	Supports the strengthening of these policies to give effect to the NPSUD 2020.	Retain as notified.
S133.070	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	Supports the strengthening of these policies to give effect to the NPSUD 2020.	Retain as notified.
S133.071	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land	Support	Supports the strengthening of these policies to give effect to the NPSUD 2020.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		Transport Plan			
S133.072	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support in part	Supports these policies, however, requests amendment to ensure Muaūpoko is specifically recognised.	Specific recognition of Muaūpoko as having connection to Te-Whanganui-Tara and interest in these policies.
S133.073	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support in part	Supports these policies, however, requests amendment to ensure Muaūpoko is specifically recognised.	Specific recognition of Muaūpoko as having connection to Te-Whanganui-a-Tara and interest in these policies.
S133.074	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Supports these policies, however, requests amendment to ensure Muaūpoko is specifically recognised.	Specific recognition of Muaūpokoas having connection to Te-Whanganui-a-Tara and interest in these policies.
S133.075	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-	Support in part	Supports these policies, however, requests amendment to ensure Muaūpoko is specifically recognised.	Specific recognition of Muaūpokoas having connection to Te-Whanganuia-Tara and interest in these policies.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		functioning urban environments - non-regulatory			
S133.076	General comments	General comments - overall	Oppose in part	<p>Our whakapapa described above indicates several instances that Muaūpoko iwi have strong ancestral and historical connections to Te Whanganui-a-Tara. At the highest level the Māori name for Wellington is named for one of our key eponymous ancestors.</p> <p>Muaūpoko traditional rohe on the Kāhui Māngai site: https://www.tkm.govt.nz/iwi/muaupoko/#</p> <p>As stated above: This rohe map represents the area over which Muaūpoko exercises kaitiakitanga for the purposes of the Resource Management Act 1991.</p> <p>The GWRC Regional Policy Statement (RPS) definitions include:</p> <p>Kaitiakitanga: as defined in the Resource management Act. The exercise of guardianship by tangata whenua of an area in accordance with tikanga Māori in relation to natural and physical resources. It includes the ethic of stewardship.</p> <p>Tangata whenua: Māori with ancestral claims to a particular area of land and resources. Literally translated as "people of the land." Iwi are tangata whenua of a particular rohe, while all Māori are tangata whenua of Aotearoa.</p> <p>Given the rohe map and historical evidence indicates Muaūpoko rohe extends over the Wellington region and is stated as the area which Muaūpoko exercises kaitiakitanga over for the purposes of the RMA, Muaūpoko connection with the land and waters in Te-Whanganui-a-Tara should be recognised and provided for in the Regional Policy Statement.</p> <p>Muaūpoko were not consulted under Clause 3(1)(d), 1st Schedule of the RMA 1991 in the preparation of the proposed plan change. This clause states:</p>	Amend the RPS to appropriately recognise Muaūpoko connection to Te-Whanganui-a-Tara throughout the policy statement. Consider a future plan change which includes formal recognition of Muaūpoko as mana whenua, with connections within the Wellington Region, including in the Tangata Whenua chapter

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>1. During the preparation of a proposed policy statement or plan, the local authority concerned shall consult--</p> <p>...</p> <p>d. the tangata whenua of the area who may be so affected, through iwi authorities; and</p> <p>...</p> <p>Amendments to Plan Change 1 are therefore requested that appropriately provide for matters affecting Muaupoko.</p>	

S127 Neo Leaf Global

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S127 Neo Leaf Global					
S127.001	General comments	General comments - overall	Not Stated / Neutral	The NPS-IB has been subject to considerable re-editing over time and remains subject to many uncertainties. One of many concerns in the NPS-IB that has been carried through into this Proposed Change 1 relates to the concept of "buffer zones", a topic certainly not landed at this time.	Withdraw these amendments until the NPS-IB has been finalised.
S127.003	General comments	General comments - overall	Not Stated / Neutral	The Proposed Change 1 is implementing "Te tātai utu o ngā tukunga ahuwheua Pricing Agricultural Emissions" before it has been finalised (only released for consultation this past week)	Withdraw provisions relating to agricultural emissions until Te tātai utu o ngā tukunga ahuwheua Pricing Agricultural Emissions" is finalised.
S127.004	General comments	General comments - overall	Not Stated / Neutral	Major concerns both about the extent of provisions linked to Freshwater and, additionally, lack of appeal rights as a consequence. Particularly with infrastructure service provision including capital works, operation, maintenance and renewal, many activities intersect with freshwater.	The complete document be reviewed via expert solicitation to justify the Freshwater linkages and practical implications.
S127.005	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	Key area of action 3 sees the introduction of the concept of "restore", which is inadequately defined at the conclusion of the RPS. It is also a blanket statement subject to considerable uncertainty as to what state, personal interpretations and timing would be applicable. It appears ignorant of the fact that our natural environment is naturally dynamic. This would offer open ended powers with little means of redress.	"Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people."

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S127.006	General comments	General comments - overall	Not Stated / Neutral	The process of restoration as outlined in this definition is wide sweeping and open ended. Whose desired former state is it? The assessment of what is needed to restore a habitat etc should not come down to the subjective opinion of a council official. Balancing perspectives are needed from expert advisors including community interests.	Replace "restore" and "restoration" to "enhancement" and "improvement" throughout the document.
S127.007	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities, including infrastructure service providers, relevant landowners and occupiers that would be impacted.</p> <p>There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained.</p>	Remove clause (b).
S127.008	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Regarding the explanation: At issue here is the presumption and lack of appreciation that nature-based solutions are not necessarily fit-for-purpose in all circumstances and may not offer pragmatic durable, safe or cost-effective solutions, and can not necessarily perform the roles and standards that infrastructure is required to meet.	Development and infrastructure planning and design should include consideration of nature-based components solutions as standard practice , including green infrastructure, green spaces, and environmentally friendly design elements to manage issues such as improving water quality and natural hazard protection. Nature-based opportunities solutions can contribute strongly to provision of perform the roles of traditional infrastructure services , while also building resilience to the impacts of climate change and providing benefits to indigenous biodiversity and community well-being."
S127.009	General comments	General comments - overall	Not Stated / Neutral	Same as for S127.008 (At issue here is the presumption and lack of appreciation that nature-based solutions are not necessarily fit-for-purpose in all circumstances and may not offer pragmatic durable, safe or cost-effective solutions, and can not necessarily perform the roles and standards that infrastructure is required to meet).	Review the complete document to resolve other references and presumptions along these lines eg. Policy 52.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S127.010	General comments	General comments - overall	Support in part	Overall support, but has significant concerns over the draconian approach, workability and yet further cost escalation implications. This submission has a focus on ensuring the RPS is workable and effective.	Ensure RPS Plan Change 1 is workable and effective.

S151 NZ Centre for Sustainable Cities

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S151 NZ Centre for Sustainable Cities					
S151.001	General comments	General comments - overall	Support	Strongly support Greater Wellington's proposals to change to its Regional Policy Statement ('Change 1') which would, among other things, implement directions required by the Government's National Policy Statements on Urban Development and Freshwater Management.	Not stated.
S151.002	Chapter 3.1A: Climate change	General comments - climate change	Support	Believe the proposed changes lay critical groundwork for achieving carbon net-zero by 2050, and generally support the changes. In particular the commitment to approximately halving (net) greenhouse gas emissions by 2030, which would facilitate the region reaching carbon net-zero by 2050 and the 60 per cent reduction (from 2018 levels) in emissions from public transport and a 40 per cent increase in cycling, walking and public transport use by 2030 and the provisions for limiting emissions-inducing sprawl.	Not stated.
S151.003	Chapter 3.1A: Climate change	Objective CC.3	Support	Support the 60 per cent reduction (from 2018 levels) in emissions from public transport and a 40 per cent increase in cycling, walking and public transport use by 2030.	Not stated.
S151.004	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support	Support the provisions for limiting emissions-inducing sprawl	Not stated.
S151.006	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand	Support	Support Policy CC.2 that would provide that developers wanting to build a subdivision on the outskirts of the region would have to demonstrate no increase in	Not stated.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		management plans - district plans		emissions - whether through the building of the houses and associated infrastructure or by creating heavy car dependency among its residents - before being granted consents.	
S151.007	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	Support enabling a shift to low- and zero-carbon emissions transport - district plans	Not stated.
S151.008	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support	Support establishment of incentives to shift to active and public transport - non-regulatory method.	Not stated.
S151.009	Chapter 3.1A: Climate change	General comments - climate change	Support in part	There are many other Objectives, Policies and Methods that we support. However, there is a significant risk that some of these may be implemented weakly, for example if they are under-resourced. It is vital that these progressive measures be appropriately resourced and implemented actively and urgently, if they are to effectively mitigate GHG emissions.	Amend provisions to address relief sought in submission.
S151.010	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Do not support some of the wording of proposed policies relating to regional urban form / peripheral urban development.	Amend provisions to address relief sought in submission.
S151.011	Chapter 3.1A: Climate change	General comments - climate change	Oppose in part	<p>Opposes the sufficiency of the target of a 35 per cent reduction in emissions from land transport by 2030. The RPS is very helpful, but it will just not to where we need to be by 2030.</p> <p>Given the difficulty of constraining emissions, and on the grounds of practical achievability, it is tempting to endorse the target of a 35 per cent reduction in emissions from land transport by 2030 (Objective CC.3). However, setting a target based on achievability alone would be misguided. The headline target of 35% by 2030 is in our view simply not sufficient, given the severity and urgency of the climate emergency.</p>	Amend provisions to be consistent with IPCC advice, with the land transport emissions reduction by 2030 should be 45%.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S151.012	General comments	General comments - overall	Support in part	Strongly support that "Change 1" will significantly influence the shape of the region's cities and towns through encouraging urban intensification that will lead to lower emissions infrastructure and new, compact housing development around travel corridors.	Amend provisions to ensure that new development around travel corridors should consider a mix of uses (rather than simply housing) where possible and viable, to further support the creation of walkable neighbourhood environments that support wellbeing through equitable access to essential infrastructure and amenities, including green spaces.
S151.014	General comments	General comments - overall	Support	The case for a change to the way we live in our cities, and the need for new transport and land use policies, is supported by a considerable amount of international evidence that we are familiar with, in the academic research literature (e.g. Creutzig et al., 2018; Javaid, Creutzig, & Bamberg, 2020; Lee & Lee, 2020).	Not stated.
S151.016	Chapter 3.6: Indigenous ecosystems	Objective 16	Support in part	Objective 16 is poorly supported by related policies or methods that protect or enhance or restore those significant ecosystem functions. New urban developments around travel corridors offer an important opportunity for protection or enhancement of vital ecosystem functions that in turn provide essential services that support ecosystem and human wellbeing.	Include stronger supporting policies and/or methods to enhance or restore significant ecosystem functions.
S151.017	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	Policy 55 of Objective CC.6 would now have wording that is weaker, from a climate mitigation viewpoint, than before. To date the wording has been put in terms of maintaining a compact and sustainable regional form, but this is now proposed to be abandoned in favour of expansion that is 'appropriate', See this move away from a goal of compact urban sustainability as highly undesirable and contradictory to the Council's broader stated intentions. 'Appropriate urban expansion' is ambiguous and could mean almost anything. In the absence of clear countervailing planning goals, and with development pressures in such areas that seem oblivious to the desirability of constraining urban form to support climate change mitigation and contain infrastructure costs (Adams & Chapman, 2016), the proposed Policy 55 would exacerbate rather than address several important problems identified in Chapter 3.9, particularly "A lack of integration between land use and the region's transportation network can create patterns of development that increase the need for travel, the length of journeys and reliance on private motor vehicles".	Amend Policy 55 with wording that unequivocally supports intensifying urban development within the contiguous urban form of the region, implicitly supporting the vision of the 15-minute city with its focus on local active and public transport, containing infrastructure costs, and significantly reducing GHG emissions below the path they would take otherwise. We would recommend not revising Policy 55, but retaining the current wording [of the operative RPS].

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S151.018	Chapter 3.1A: Climate change	Objective CC.3	Support in part	<p>Setting a target based on achievability alone would be misguided. The headline target of 35% by 2030 is not sufficient, given the severity and urgency of the climate emergency, which Greater Wellington acknowledged in 2019 (GWRC, 2022, p.9), and the growing impatience of the global community around New Zealand's slowness to act to cut emissions (Daalder, 2020). Proposed Objective CC.3 amounts to a less stringent commitment for land transport than for other sectors, as indicated by the reference to contributing to a 50% reduction in net emissions (9), and by section 3.1A of Change 1.</p> <p>The less Wellington and the rest of New Zealand achieve on mitigation of land transport emissions, the more other parts of New Zealand, other sectors, and other parts of the world must achieve if the 1.5C warming limit is to be anywhere near attainable. Essentially, the following is the trade-off: either generally affluent Wellingtonians are incentivised and persuaded to cut transport emissions a little more, OR some other (less affluent on average) New Zealanders must mitigate more, OR some other countries (on average less affluent than NZ) must mitigate more, OR the world as a whole will not stay within the 1.5C temperature limit. On the evidence to date, the last scenario is the most likely outcome, and implicitly, is endorsing this highly undesirable outcome if it defaults to not adopting an adequate level of ambition in regard to transport related emissions.</p>	<p>Amend Objective CC.3(a)(i) as follows: ... (i) 35 45 percent reduction from 2018 levels in land transport generated greenhouse gas emissions, and ...</p>
S151.019	Chapter 3.1A: Climate change	Objective CC.3	Support	<p>Note the point in the section 32 analysis report which comments that, in the case of the preferred option...</p> <p>'There is the chance that later regional emission reduction targets may be more ambitious and the policy package no longer adequate, however future amendments can address this...'</p> <p>Do not believe there is likely to be sufficient time to allow for a change to more stringent and ambitious targets including making adequate changes to the package to reduce emissions more by 2050, given the considerable lags in the decision-making system and implementation, and the slowness with which New Zealanders make changes in their transport behaviour, except under exceptionally strong incentives or coercion which are generally inconsistent with democratic governance. That</p>	<p>Amend provisions to set more sufficiently stringent targets now, and explain why they need to be ambitious.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				is why setting sufficiently stringent targets now, and explaining why they need to be ambitious, is so vital a part of climate leadership.	
S151.020	Chapter 3.1A: Climate change	Objective CC.3	Support	In regard to climate change science there is high probability of 'nasty climate surprises' in years ahead. Such disturbing new scientific information usually requires targets to be strengthened, and a more urgent transition set in train. The risks are accentuated by the geopolitical realities of the current largely fossil-based energy system, and the tendency of governments to underperform in delivering on emission reduction pledges. The necessary strategic response is not to avoid this reality, but to acknowledge it and, if anything, over-achieve to rebalance the risks; that is, to formulate and adopt stringent 'best practice' policies that accelerate the necessary transitions, while building awareness of why such policies are critical.	Strengthen the target level of land transport emissions reduction to be 45% by 2030, and adjust the ambition of subsidiary policies in accord with this target. e.g. ensure that all levers including urban intensification and diversification (mixing of land use), mode shift, electric vehicle uptake, affordable public transport expansion, reduction in car trips, equitable new funding mechanisms including congestion charging, and every other effective lever are all stretched to the limit of what is possible in eight years.

S35 Oliver Bruce

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S35 Oliver Bruce					
S35.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. It's counterproductive that in this day and age, traffic-inducing greenfield subdivisions of single-family detached houses are still the lion's share of new homes being built. Buildings, streets, roads, parks etc will be there for decades, and how well they're done will profoundly limit (or enable) the people who live there. It's currently easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions good intensification for growth, rather than greenfield.
S35.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Need to make sure that new developments allow people to use other transport options than private vehicles. There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S35.004	General comments	General comments - overall	Support	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification.
S35.005	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Provisions should be retained, refined and enhanced.
S35.006	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support provisions relating to climate-resilient urban areas.	Provisions should be retained, refined and enhanced.
S35.007	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support provisions relating to indigenous biodiversity.	Retain, refine and enhance provisions.

S11 Outdoor Bliss Heather Blissett

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S11 Outdoor Bliss Heather Blissett					
S11.001	Chapter 3.1A: Climate change	Issue 3: The risks associated with natural hazards are exacerbated by climate change	Support in part	Concern is the use of the word 'climate change'. It blames a third party and does not take ownership and is passive and even a word that creates resistance for many out there today.	Amend Issue 3 as follows: "The risks associated with natural hazards are exacerbated by human induced climate destruction climate change "
S11.002	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	There still remains no provision for off-grid tiny houses or similar and yet throughout the entire country it is local councils that continue to be the barrier to their existence. Consider that this is due to no rateable value for tiny houses and not in Council's best interests to support.	Amend as follows: Implement Promoting and enabling energy efficient design and small scale renewable energy generation including small scale dwellings such as off grid tiny homes - district plans.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S11.003	Chapter 3.1A: Climate change	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Change the wording to an action. The document is far too passive.	Amend as follows: Mandate information about energy efficient subdivision, design and building development
S11.004	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support in part	For me to stay active and walk to work years ago at the same place that some of my children attended education. Cost me \$10 per day rather than drive to the same destination.	Amend policy as follows: Establish incentives to shift to active and public transport - consider reducing the working day to 6 hours and increasing the hourly wage and thereby increase wellbeing overall.
S11.005	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	Remove words information, promote, support and encourage and replace with action. Now is time for action and these words are still too passive. My local Council have been ignoring GWRC information, promotion, support and encouragement to date.	Amend as follows: Incentivizing efficient use and conservation of resources - regulatory.
S11.006	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Support in part	Correction to page 30. In Upper Hutt a main Highway divides a people from the river creating a disconnect. One idea. Lift the road so that people can access the river freely and accessibly.	Change the wording from "Flood management" to "Environmental protection".
S11.007	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems -	Support in part	Needs to be essential	Amend as follows: Protecting and enhancing the health and wellbeing of water bodies and freshwater ecosystems - consideration essential

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration			
S11.008	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Health of the river comes first	Amend as follows: Take and use of water for the health needs of the river first and then people
S11.009	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems introductory text	Support in part	Spelling mistake in introductory text	Change Rimutaka to how it is spelt: Remutaka
S11.010	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 4: Consideration - resource consents, notices of requirement and when changing, varying or reviewing plans	Support in part	Let community be part of the solutions	Amend as follows: Method 4 Implementation: Wellington Regional Council and city and district Councils and community
S11.011	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support in part	Let community be part of the solutions.	Method 14 Implementation: Wellington Regional Council and city and district Councils and community
S11.012	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Support in part	Let community be part of the solution	Include community as part of the solutions

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S11.013	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support in part	Not stated.	Amend the explanation of Policy 2 to include: "seeks to protect neighbouring areas which includes our natural environment, indigenous wildlife and vegetation , and peoples health from..."
S11.014	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	Add plural. Trees are social.	Amend explanation of Policy CC.6 as follows: "...The policy directs regional plans to develop provisions that will support "right tree S -right place", seeking..."
S11.015	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support in part	I would like to see incentives that make an impact	Implement incentives that make an impact such as costs to the developer being greater if not using sustainable practice
S11.016	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and	Oppose in part	Policy if they still exhibit the ecosystem functions which are considered significant by mana whenua/tangata whenua. 30 June 2025 is plenty of time for current landowners to destroy evidence that their land exhibits the ecosystem functions. Eg. Mangaroa Wetlands. What about resistance from landowners which currently exist.	Consider timeframe to implement policy and associated risks.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		regional plans			
S11.017	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Not stated.	Amend Policy 29(c) to read: "Include objectives, policies and rules to manage subdivision, use and development in those areas where hazards and risks are assessed as low to moderate;
S11.018	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support in part	Not stated.	Amend Explanation as follows: "...The centres identified are of significance to the region's form for environmental wellbeing and indigenous biodiversity , economic development, transport movement..."
S11.019	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Too passive	Amend as such: "Regional city and district Councils will should under Local Government Act 2002..."
S11.020	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation	Support in part	Take out last sentence of explanation as it cancels what has just been said. Too passive.	Amend Explanation as such: "... but this is not expected to be a requirement "

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		on programmes - non-regulatory			
S11.021	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	Need a better more definitive word than preference	Amend Policy CC.18 as such: "... regeneration of permanent indigenous forest instead of in preference to exotic species"
S11.022	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	Not stated.	Amend Policy IE.3(b) as such: "Where possible, priorities should will also deliver benefits for..."
S11.023	General comments	General comments - overall	Support in part	Can we remove all the words information, promote, support and encourage to an action. We have been doing this for years and now is time for action. Still too passive. My local Council have been ignoring your information, promotion, support and encouragement to date. The document is far too passive.	Use stronger language throughout the document: Replace "information", "promote", "support" and "encourage" with "implement" or "incentivize" (or better word), Replace "consideration" with "essential". Replace "non-regulatory" with "regulatory".
S11.024	Chapter 3.4: Fresh water (including public access)	Table 4	Support in part	Protecting and enhancing the health and wellbeing of water bodies and freshwater ecosystems, then take and use of water.	Swap Policy 17 and Policy 40.
S11.025	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Not Stated / Neutral	In 30 years most of the baby boomers will be gone and people are having less or no children. Are these projections still correct.	Review projections on page 78.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S71 Parents for Climate Aotearoa					
S71.001	General comments	General comments - overall	Support	Parents for Climate Aotearoa fully support the proposed Regional Policy Statement. We need to maintain regional emissions reduction target to stay within 1.5 degrees of warming above pre-industrial levels, including 50% reduction by 2030 and net zero by 2050. Applying a climate lens to every decision made in these areas is crucial and these decisions and choices must be future proofed. Decisions made today impact generations beyond our own and as current leaders in this space, GWRC has a responsibility to ensure decisions made are in line with the science and in the best interest of ALL in our communities.	Retain as notified.
S71.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Building homes should not mean increased emissions, especially through urban sprawl and encouraging car dependent suburbs.	Need to maintain and strengthen the links in the RPS between transport and urban development and emissions reduction so that any new transport and urban development projects must show how they will not increase emissions.
S71.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Creating climate resilient urban areas is win win for everyone now and for future generations.	Include a non-regulatory method to require the Council to invest into upskilling the various teams such as planning, regulatory and consenting to be grounded in the skills and knowledge on how to do intensification well.
S71.004	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	It is not acceptable to continue practices that harm our waterways and biodiversity. We support changes to ensure we are protecting our natural environment for the health and wellbeing of all.	Retain the strong provisions on freshwater, including the provisions related to Te Mana o te Wai and the environmental bottom lines related to freshwater pollution.

S67 Pareraho Forest Trust

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S67 Pareraho Forest Trust					
S67.001	General comments	General comments - overall	Support	We need to make changes now to shape the future of our towns and cities to ensure goals around improving the health of our streams and oceans, our protection of biodiversity and our transition to low-carbon lifestyles are	Retain RPS Pland Change 1 in its entirety.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>achieved.</p> <p>This must mean focusing future housing intensification around our railway lines, and getting that intensification right, including with the provision of quality water infrastructure, community and green spaces, and access to nature.</p> <p>We must give greater statutory weighting to climate change mitigation and adaptation opportunities.</p>	

S106 Patricia (Dr) Laing

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S106 Patricia (Dr) Laing					
S106.001	General comments	General comments - overall	Support	Support integrated management approach of the region's natural and built environment guided by Te Ao Māori.	Not Stated.
S106.002	General comments	General comments - overall	Oppose in part	Plan Change 1 is complicated, unworkable; and, will put unreasonable demands and high cost pressures on landowners. Furthermore, freshwater provisions have been extended beyond what they should be, serving to prevent important consultation to clarify what will happen on the ground. There are also matters of process, and gaps in the content, that undermine an integrated management approach, and that therefore desperately need to be addressed.	Not stated.
S106.003	General comments	General comments - overall	Not Stated / Neutral	NPS-IB is at exposure draft stage now (so not gazetted) so disagrees with the statement that the direction of the NPS-IB is clear at present.	Wait to align Plan Change 1 with NPS:IB once the direction of the NPS:IB is clear.
S106.004	General comments	General comments - overall	Oppose	Inadequate consultation and input with stakeholders in the apiculture industry. No apicultural representative was included in the Farming Reference Group. This can undermine an integrated management approach.	Need to rectify the lack of consultation with the apiculture industry.
S106.005	General comments	General comments - overall	Not Stated / Neutral	The NPS-UD has implications for beekeeping. In the Upper Hutt City Council area the titles in some new developments limit the number of beehives that property owners can host. On the other hand, some commercial beekeepers have arrangements with UHCC to place high	Landowners' usage rights relating to beekeeping need clarification.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				numbers of hives on Council land adjoining new developments which raises a question about whether this could be regarded as "boundary stacking".	
S106.006	General comments	General comments - overall	Not Stated / Neutral	The list of pests to be managed under Plan Change 1 does not include wasps that in some cases threaten the continuity of apicultural endeavours in the region.	Add wasps to the list of pests managed by the GreaterWellington Regional Council.
S106.007	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Not Stated / Neutral	Objective A seems to be an isolated mention of the importance of ensuring food security in the region. This topic could easily be missed, but needs to be highlighted especially in relationship to NPS-UD, NPS-IB, and extreme weather as well as in mitigation relating to Climate Change. Pollinating bees are crucial to successful food security in the Wellington region, as is increasing appropriate farming opportunities to protect food security including beekeeping.	Amend or add provisions to increase appropriate farming opportunities to protect food security including beekeeping.
S106.008	General comments	General comments - overall	Not Stated / Neutral	Disagrees with pre-empting the national direction Te Tatai utu o nga Tukunga Ahuwhenua: Pricing Agricultural Emissions before it has been finalised as it has only just been released for consultation.	Not stated.

S61 Patrick Morgan

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S61 Patrick Morgan					
S61.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions good intensification for growth, rather than greenfield.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S61.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S61.005	General comments	General comments - overall	Support	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification.
S61.006	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
S61.007	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support creating climate-resilient urban areas..	Retain, refine and enhance provisions.
S61.008	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support provisions supporting biodiversity.	Retain, refine and enhance provisions.

S118 Peka Peka Farm Limited

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S118 Peka Peka Farm Limited					
S118.001	Chapter 3.1A: Climate change	Objective CC.2	Oppose	It is unclear what resource management purpose Objective CC.2 addresses or how it can be achieved in the planning context.	Delete Objective CC.2.
S118.002	Chapter 3.1A: Climate change	Objective CC.3	Oppose	Supports the broader intent of Objective CC.3, it is unclear how the objective can be achieved through resource management plans. Does not consider that the resource management planning framework is the best or most appropriate means to achieve the outcomes.	Delete Objective CC.3.
S118.003	Chapter 3.1A:	Objective CC.7	Support in part	Objective CC.7 does not appear to serve any additional resource management purpose that isn't already	Delete Objective CC.7 or combine Objective CC.7 with Objective CC.6.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Climate change			addressed by Objective CC.6 and can be deleted or combined with Objective CC.6.	
S118.004	Chapter 3.1A: Climate change	Objective CC.8	Support in part	Objective CC.8 further addresses climate resilience but is specific to iwi and hapu. The objective can be appropriately combined with Objective CC.6.	Combine Objective CC.8 with Objective CC.6.
S118.005	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Oppose	Concerned that Policy CC.2 creates uncertainty by shifting this requirement to district plan level, leaving the potential for individual district plans to set potentially varying thresholds. The use of 'more than minor' is open to interpretation and therefore creates additional uncertainty of application. Also concerned at the difficulty in ongoing monitoring and enforcement that this policy will create.	Delete Policy CC.2.
S118.006	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Supports the matters listed in Policy CC.14, linking those to a well-functioning urban environment broadens that existing definition as set out in Policy 1 of the NPS-UD, however seeks that this linkage be removed from the policy.	Amend Policy CC.4 as follows: "Policy CC.4 Climate resilient urban areas - district and regional plans (FPP) District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments. "
S118.007	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	The policy oversteps the role of the resource management planning framework and addresses matters that are best suited to national policy direction.	Delete Policy CC.8.
S118.008	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure -	Oppose	The policy lacks clarity to enable its meaningful implementation.	Delete Policy CC.9.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration			
S118.009	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose	The policy encourages a whole of life carbon emissions assessment for all new or altered transport infrastructure. The policy is unclear as to the level of infrastructure that would trigger its requirement, as given the policy wording 'encourages' the provision of the information, it will be open to dispute.	Delete Policy CC.11.
S118.010	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Policy 14 is directive to regional plans. Sub-sections (f) and (g) and (h) relate to requirements on urban development which, without appropriate qualification, may be outside of the scope of a regional plan. Some of these matters are also replicated in Policy FW.3 and Policy 15.	Delete or appropriately qualify sub-sections (f), (g) and (h) of Policy 14. Amend Policy 14 to not duplicate Policy FW.3 and Policy 15.
S118.011	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Policy FW.3 is directive to district plans, requiring them to give effect to Te Mana o te Wai and section 3.5(4) of the NPS-FM. In doing so, the policy specifies 17 requirements, many of which lack clarity and are uncertain. This range of matters makes the policy cumbersome and difficult to interpret. Supports the intent of the policy but seeks that the drafting of the policy be improved, including by removing any unnecessary duplication of the NPS-FM or other RPS policies.	Amend Policy FW.3 to address the relief sought in the submission.
S118.012	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	Policy 42 is a consideration policy relevant to effects on freshwater and the coastal marine area. The policy specifies 18 matters that must be considered. As for Policy FW.3 above, the number of matters specified makes the policy cumbersome and difficult to interpret. Supports the intent of the policy but seeks that the drafting of the policy be improved, including by removing any unnecessary duplication of the NPS-FM or other RPS policies.	Amend Policy 42 to address the relief sought in the submission.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S118.013	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	<p>Objective 22 seeks to enable urban development where it "demonstrates the characteristics and qualities of well-functioning urban environments, which" and then lists a range of matters. Each matter is linked with an 'and' thereby creating a requirement that urban development achieves each of the listed matters before the objective would consider the urban development to be enabled.</p> <p>Policy 1 of the NPS-UD defines a 'well-functioning urban environment'. If the objective is seeking to define a well-functioning urban environment then the definition of the NPS-UD should be the starting point. The policy has the effect of adding 11 additional aspects that would need to be addressed and satisfied to consider a proposal to be a well-functioning urban environment. This is inconsistent with the intent of Policy 1 of the NPS-UD.</p>	<p>Amend Objective 22 as follows:</p> <ul style="list-style-type: none"> • Remove the 'and' following each listed matter; • Be based on the definition of 'well-functioning urban environment' as defined in Policy 1 of the NPS-UD; and • Remove superfluous matters that are otherwise addressed by the RPS or NPS-UD.
S118.014	Chapter 3.9: Regional form, design and function	Objective 22B	Oppose in part	The objective lacks clarity as to what is meant by 'strategically planned'.	Delete Objective 22B or insert new definition for 'strategically planned'.
S118.015	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Policy 55 extensively adds to the definition of a 'well-functioning urban environment', particularly through matter (ii). Matter (ii) cross-references to other topic areas of the RPS that are otherwise relevant considerations and do not need to be included here.	<p>Amend Policy 55 as follows:</p> <p>"When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region's urban areas (as at August 2022), particular regard shall be given to whether:</p> <p>(a) The urban development contributes to establishing or maintaining the qualities of a well-functioning urban environment, including: (i) the urban development will be well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors; (ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or resources identified by this RPS, including: 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29, 2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23, 3. Protecting outstanding natural features and landscape values as identified by Policy 25, 4. Protecting historic heritage values as identified by Policy 22, 5. Integrates</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>Te Mana o Te Wai consistent with Policy 42,6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC.17.7. Recognises and provides for values of significance to mana whenua / tangata whenua,8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and ..."</p>
S118.016	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	<p>Policy 56 lists a range of considerations for the management of development in rural areas. Matter (a) relates to impacts on productive land. This matter may well have been overtaken by the introduction of the NPS on Highly Productive Soils and could be removed pending GWRC giving effect to the NPS.</p> <p>Matter (d) requires consideration of the consistency of a development with a Future Development Strategy or other growth strategy and is reflective of Policy 55 above. Matter (e) notes that in the absence of such a strategy consideration is required of the pressure development may put on existing services and infrastructure.</p> <p>While the policy mirrors Policy 55 in terms of reflecting consideration of growth strategies, it does not similarly reflect Policy 55 in considering 'out of sequence' development. Either the policy is intending to duplicate the matters in Policy 55 with respect to growth management in which case it should mirror all relevant aspects, or matters (d) and (e) should be removed and Policy 55 and UD.3 should be relied upon.</p>	<p>Amend Policy 56 as follows:</p> <ul style="list-style-type: none"> • Re-considering whether matter (a) remains necessary as currently worded given the introduction of the NPS on Highly Productive Soils; • Remove duplication, or ensure consistency, between Policies 55, 56 and UD.3.
S118.017	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Oppose in part	<p>Policy 58 is not consistent with Objective 6(c) and Policy 8 of the NPS-UD relating to being responsive to proposals that would bring about significant development capacity. It is not always possible to achieve all of the matters listed in Policy 58.</p> <p>The policy is internally inconsistent with proposed Policy 57(e) of the RPS which recognises that the timing and sequencing of land use and public transport may result in a period where public transport may not be practical.</p>	Delete Policy 58 or amend the policy to achieve consistency with Objective 6(c) and Policy 8 of the NPS-UD.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S118.018	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>Policy UD.3 lists a range of criteria which must be given particular regard when considering developments that provide for significant development capacity.</p> <p>Matter (a)(i) references the "characteristics and qualities of a well-functioning urban environment" as identified in Policy 55(a)(ii) and Objective 22. These matters have been addressed above.</p> <p>It is unclear what is meant by matter (c)(iv) of the policy and this matter should be clarified or deleted.</p>	<p>Amend Policy UB.3 as follows:</p> <ul style="list-style-type: none"> • Make consequential amendments that reflect the relief sought in respect of Objective 22 and Policy 55; or • Deleting the words "identified in Policy 55(a)(ii) and Objective 22" from Policy UD.3(a)(i); • Remove reference to 'high density' and 'medium density' zoning; and • Delete or clarify matter (c)(iv).
S118.019	General comments	General comments - overall	Support in part	<p>Supports the overall intent to appropriately address matters relating to climate change, facilitating mode shift and active transport modes, sustainable urban development, and freshwater management. Has some concerns about the scope and effect of PC1, issues relating to clarity of drafting, along with ensuring that PC1 appropriately gives effect to the requirements of the NPS-UD. Concerned that PC1 should be the best and most appropriate resource management response to the issues being addressed, that PC1 appropriately gives effect to national direction, does not unduly duplicate national direction and does not confuse jurisdictional boundaries. The direction of the RPS needs to be clear so that it is not subject to interpretation. Considers that a number of objectives and policies do not achieve these aims.</p>	Amend objectives and policies to address the relief sought in the submission.
S118.020	General comments	General comments - overall	Not Stated / Neutral	<p>Notes that the leadership role of Greater Wellington in facilitating some of the outcomes sought by PC1, including in its investment in and operation of existing and new public transport infrastructure and services. Both the planning framework and these investments need to be designed and implemented in a manner that supports and does not preclude otherwise appropriate development opportunities.</p>	Not stated.

S123 Peter Thompson

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S123 Peter Thompson					
S123.001	Chapter 3.1A: Climate change	General comments - climate change	Support	<p>Climate change is a major issue for the region (country, world) and action is important</p>	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S123.002	Chapter 3.1A: Climate change	Objective CC.1	Support	Nature-based solutions are key to dealing with the impacts of climate change.	Retain as notified.
S123.003	Chapter 3.1A: Climate change	Objective CC.4	Support	Nature-based solutions are key to dealing with the impacts of climate change.	Retain as notified.
S123.004	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Allowing regeneration or planting of indigenous forest on highly erodible land will provide multiple benefits.	Retain as notified.
S123.005	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Nature-based solutions are key to dealing with the impacts of climate change.	Retain as notified.
S123.006	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to	Support	Nature-based solutions are key to dealing with the impacts of climate change.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		climate change - consideration			
S123.007	Chapter 3.1A: Climate change	Objective CC.5	Support	Allowing regeneration or planting of indigenous forest on highly erodible land will provide multiple benefits	Retain as notified.
S123.008	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	Strongly advocate for using the appropriate species for the forest cover	Retain as notified.
S123.009	Chapter 3.6: Indigenous ecosystems	Objective 16	Support	It is vital that the indigenous ecosystems and habitats of the region are maintained	Retain as notified.
S123.010	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support	It is vital that the indigenous ecosystems and habitats of the region are maintained	Retain as notified.
S123.011	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support	Partnering is very important in this space	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S123.012	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	Support	Partnering is very important in this space	Retain as notified.
S123.013	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	This support is very necessary to assisting a transition to a low emission environment	Retain as notified.
S123.014	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	This should have been completed years ago - the timeline of 2025 is useful	Retain as notified.
S123.015	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity	Support	This should have been completed years ago - the timeline of 2025 is useful	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		values - district and regional plans			
S123.016	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support		Retain as notified.
S123.017	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	The target of 10 percent tree canopy cover at a suburb-scale is useful.	Retain as notified.
S123.018	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support	The addition points added in this policy are important ones that will aid resilience to climate	Retain as notified.
S123.019	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous	Support	This is a key piece of work that needs to be completed to ensure that a difference is made	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		ecosystem health - non-regulatory			
S123.020	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Support	Assistance is needed by care-groups and lanowners to care for indigenous ecosystems	Retain as notified.
S123.021	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support	Assistance is needed by care-groups and lanowners to care for indigenous ecosystems	Retain as notified.
S123.022	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support	Limits are needed if the decline in biodiversity is to be halted	Retain as notified.

S27 Peter Ramage

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S27 Peter Ramage					
S27.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support GWRC making policy to influence councils in the Wellington region to not plan to build homes without considering the impact on emissions over the life cycle of those homes. Should not support greenfield single family	Retain and strengthen provisions relating to urban intensification and reducing urban emissions.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				detached houses in places where it is hard to provide public transport, and where most day-to-day tasks will require a car. Decisions on the built environment have impacts for decades. We need to get it right first time. Development needs to be focused in the walkable catchments of places people already want to be, or with convenient public transport to take them to these places.	
S27.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools, besides TDM plans, provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S27.005	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification

S62 Philip Clegg

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S62 Philip Clegg					
S62.003	Appendix 3: Definitions	General comments - definitions	Support in part	I strongly recommend that GWRC consider moving the definitions to the start of the RPS. The definitions contain critical information that materially affects how the RPS will be applied. For instance, people will assume the natural and ordinary meaning of "restoration" will apply, unless they have seen the definition.	Move the definitions section to the front end of the RPS.
S62.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Oppose	Concerned about references to wrapping 'constraints' around the central government's housing intensification direction and the NPS-UD when regional policy statements are subordinate to primary legislation and national policy statements, and are superior to regional and district plans.	Amend the proposed RPS to remove any and all clauses that seek to "constrain" the intent and direction of NPS-UD.
S62.005	Chapter 3.1A: Climate change	General comments - climate change	Oppose	Concerned that content in Plan Change 1 relating to climate change has been included in advance of central government direction on the issue. The council's concern is laudable, but the issue is best dealt with at a national level. Regional approaches to climate change are most likely to result in a patchwork of inconsistent requirements that will make things challenging, if not unfair, for	Remove any and all clauses relating to climate change pending further regulatory instruments from central government. Release the documents used to formulate the climate policy so the science can be tested by the community.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				businesses and residents. At worst, the regulatory incentives could lead to a race to the bottom.	
S62.007	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose in part	The proposed RPS contains references to the Fresh Water indicator in numerous places and whilst in some cases there is a clear linkage to NPS-FM there are many where the linkage is tenuous at best. Concerns that the criteria listed in the preamble for determining the scope of a freshwater planning instrument - namely that there should be a direct relationship to freshwater quality or quantity - have not been applied in a consistent way throughout Plan Change 1.	Remove references to the Fresh Water indicator from those parts of the document that don't meet the criteria specified in the preamble.
S62.009	Chapter 3.1A: Climate change	Climate change introductory text	Oppose	The reality is that significantly reducing emissions in the Wellington region is not going to have any impact on the global situation. Need to see analysis or modelling to understand the impacts on the regional economy and whether the economy and community could sustain the emission cuts needed. For the region and the nation to cope with the results of climate change, we need to have the strongest economy that we can generate which will give us the resilience to mitigate the inevitable consequences of changing weather patterns and sea levels. We also need to act in a nationally consistent way to make the most effective and efficient interventions that impact fairly and equitably.	Remove the proposed climate change provisions pending central government direction on climate change. Alternatively, the proposed RPS should recognise the need for a strong economy and put in place measures to promote commerce and sustainable agriculture as a key element of this.
S62.010	Chapter 3.1A: Climate change	Climate change introductory text	Oppose in part	Opening statement says that we are already locked into continued global warming until at least mid-century. However, action 1 states that methane reductions offer a significant opportunity for global cooling in the short-term. These statements appear to be contradictory.	Amend this statement to remove this contradiction and release the documents on which these statements are based so the community can understand the science.
S62.011	Chapter 3.1A: Climate change	Climate change introductory text	Oppose in part	It's not clear why GWRC thinks that increasing greenhouse gas sinks through carbon sequestration is only a short-term solution. If done properly through plantation forests that are sequentially harvested, it can both lock in carbon and produce an ongoing economic benefit.	Delete the reference to greenhouse gas sinks being a short-term solution. Release the documents on which this statement is based so the community can understand the science.
S62.012	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend as follows: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					biodiversity and ultimately, people.
S62.013	Chapter 3.1A: Climate change	Issue 3: The risks associated with natural hazards are exacerbated by climate change	Oppose in part	This statement is made from a pre-conceived point of view and does not appear to be based on evidential analysis. There are numerous examples of hard engineered protection works throughout the world that have given and continue to give the protection that they were designed to achieve. Thames Barrier (tidal surge), Rhine estuary at Maastricht (tidal surge and controlled river flow), Afsluitdijk (to create dry land from a 5 metre deep seawater bay). Closer to home the entire Hutt valley is protected from periodic flooding by the stop bank system and there will only be any increased risk if there is a failure to maintain them.	Amend as follows: The risks associated with natural hazards are exacerbated by climate change. The hazard exposure of our communities, land, infrastructure, food (including mahingakai), and water security is increasing because of climate change impacts on a range of natural hazards. Traditional approaches to development that have not fully considered the impacts on natural systems, and our over-reliance on hard engineered protection works, which will inevitably become overwhelmed and uneconomic to sustain, will ultimately increase the risk to communities and the environment.
S62.014	Chapter 3.1A: Climate change	Issue 4: The impacts of climate change will exacerbate existing inequities	Support in part	Supports consideration of equity and fairness in the approach to managing climate change response. However, concerned about situations where peatland landowners are expected to bear the full cost of maintaining a carbon store for climate change purposes for the benefit of the wider community without recompense, which is not considered to be fair or equitable.	If the climate change provisions remain, GWRC needs to identify how it will mitigate the impacts of climate change restrictions on landowners whose land is substantially or wholly co-opted as part of a "nature based solution".
S62.015	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support in part	This policy appears to be inconsistent with the national-level Freshwater Fisheries Regulations. The RPS should not require people to do anything that will incur additional compliance costs or liability under the Regulations.	Amend Policy 10 to resolve inconsistencies with the Freshwater Fisheries Regulations.
S62.016	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	There are many situations where a change in agricultural practice will result in both an increase and a decrease in emissions. The focus should be on the net change, not just on one side of the equation.	Amend as follows: Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase in gross-net greenhouse gas emissions from agriculture.
S62.017	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on	Oppose in part	Questions the evidential basis for the assertions that indigenous forest is better at sequestering carbon than exotic forest, or that permanent forest is better at carbon sequestration than, say, sustainably farmed timber forests (which could be native or exotic species). Refer to submission for more detail on reasoning.	Revisit the assertion in the policy that permanent indigenous forest gives the best overall outcome taking all factors into consideration and produce the scientific evidence for scrutiny and peer review.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		highly erodible land - regional plans			
S62.018	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Supports protecting Aotearoa's remaining natural wetlands, however concern about a policy that requires the restoration of all wetlands. This is because the definition of restoration is inadequately defined and requires restoration to an unspecified prior state.	Either make the restoration of wetlands a non-regulatory method; or Amend the policy so the requirement to restore only applies to natural wetlands and not to areas like the peatland that have been so degraded they have ceased to be natural wetlands.
S62.019	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	The NPS-IB hasn't yet been released following consultation on the exposure draft. The exposure draft indicated that SNA area plans would need to be notified within 5 years from the commencement date (which we won't know until the NPS-IB is promulgated). The June 2025 date will put unnecessary pressure on already overloaded local authorities to produce SNA maps that are based on criteria not yet released in the NPS-IB. That will likely impact on time for community consultation, and result in further erosion of public support for SNAs.	Withdraw policy until the NPS-IB has been released, and when the policy is ready to be notified, delete " 30 June 2025 " and replace with " within 5 years from the commencement date of NPS-IB ".
S62.020	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Not Stated / Neutral	Hierarchy is defined as a system in which people or things are put at various levels or ranks according to their importance. Policy 30 does not identify a hierarchy.	Amend as follows: Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region for which district plans must maintain and enhance...
S62.021	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	Policy 31 is an unnecessary inclusion that has the potential to cause confusion. The NPS-UD clearly specifies how Local Authority District Plans are to be amended to give effect to the NPS and Policy 31 just inserts another layer of bureaucracy in the process without really adding any value.	Delete Policy 31 from the RPS.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S62.022	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Oppose	Policy 32 repeats clear direction that is contained in NPS-UD. It is unnecessary and should be removed.	Delete Policy 32 from the RPS
S62.023	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support in part	Requests an example of a whole of life carbon assessment to assist people with their preparation. The assessment that GWRC prepared for its EV bus fleet would be an excellent example.	Insert an example of a whole of life carbon assessment (such as the EV bus fleet example) into the RPS or as part of non-regulatory guidance to assist with the preparation of such assessments.
S62.024	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	As per Policy CC.5. In focussing on gross emissions GWRC is only looking at part of the picture. There are always two sides to any equation, so net emissions is the correct measure here.	Amend as follows: When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to: (a) reducing gross net -greenhouse gas emissions as a priority where practicable, and
S62.025	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the	GWRC be required to clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. GWRC be required to collaborate closely with the community in developing rules to ensure workability.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S62.026	Appendix 3: Definitions	Nature-based solutions	Oppose in part	Opposes the inclusion of the reference to peatland within the definition of 'nature-based solutions' as this is contrary to the Environment Court's finding in GWRC v Adams and ors. Concerned that the reference to peatland being protected to retain carbon stores will be used as justification to limit the use of the peatland by its owners.	Remove " protecting peatland to retain carbon stores " from the definition.
S62.027	Appendix 3: Definitions	Protect (in relation to indigenous biodiversity)	Oppose in part	The definition of 'protect' is worryingly broad and vague and needs to be made more specific.	Make the components of the 'protect' definition more specific so it can be meaningfully understood and consistently applied. Consult with the community on the redrafted definition to promote its legitimacy.
S62.028	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Make the components of the 'restoration' definition more specific so it can be meaningfully understood and consistently applied. Consult with the community on the redrafted definition to promote its legitimacy.

S28 Philippa Yasbek

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S28 Philippa Yasbek					
S28.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support ensuring that new homes generate fewer emissions on average than existing homes. Building sprawling, car-intensive suburbs locks in large amounts of emissions for decades as these are very long-lived investments. New housing should be through intensification of existing areas and those close to amenities rather than creating new car-dependent suburbs. Transport Demand Management Plans would be a helpful check on unsustainable new suburbs.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S28.002	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support indigenous biodiversity provisions.	Retain as notified.
S28.003	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Support provisions for Te Mana o te Wai.	Retain as notified.
S28.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support creating climate-resilient urban area.	Retain as notified.
S28.005	Chapter 3.1A: Climate change	General comments - climate change	Support	Transport Demand Management Plans would be a helpful check on unsustainable new suburbs.	Retain as notified.

S30 Porirua City Council

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S30 Porirua City Council					
S30.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1: Adverse impacts on natural environments and communities	Oppose	Resource management issue 1 is titled 'adverse impacts on natural environments and communities', however unlike adverse effects on natural resources, adverse effects on communities are not identified. The issue is framed very negatively. For instance, not all ecosystems have been destroyed, but certainly some have, and many have been degraded. Some ecosystems are still intact. This creates an unbalanced issue statement and associated Objective A which fails to identify the benefits of urban development as identified by the National Policy Statement on Urban Development 2020.	Amend reason 1 to identify adverse effects on communities and the benefits of urban development, and relocate effects of climate change into a separate issue; and/or reword as follows: 1. Adverse impacts on natural environments and communities Inappropriate and poorly managed use and development of natural and physical resources the environment, including both urban and rural activities, have damaged and continue to impact the natural environment, and to contribute to an increase in greenhouse gas emissions,. It has also resulted in destroying-degraded ecosystems, degrading and water quality, adversely impacting the relationship between mana whenua and the taiao., and leaving communities and nature increasingly exposed to the impacts of climate change.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>2. Increasing pressure on housing supply and choice and infrastructure capacity Population growth is putting pressure on housing and infrastructure capacity. To meet the needs of current and future populations, poorly managed development will place additional pressure on the natural and built environments.</p>
S30.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Oppose	It is unclear what this objective is seeking to achieve and could be better worded.	Amend objective A so that the outcomes sought are achievable within the scope of an RPS including clarifying what is meant by "development" in (f). Include a wider selection of objectives to demonstrate a more holistic and interconnected approach to resource management in the region, including regional form.
S30.003	Chapter 3.1A: Climate change	Climate change introductory text	Oppose	Long introductory statements unnecessarily lengthen a plan which is not consistent with best practice plan making. It is also not necessary to replicate matters covered in section 32 reports. If the intention is to reiterate background content to the provisions, it is odd how there is no mention of either the National Adaptation Plan or the Emissions Reduction Plan. In addition, wording changes are sought to improve accuracy.	<p>Amend introduction to shorten and avoid repetition with Section 32 reports and/or reword as follows:</p> <p>(...)</p> <p>While historical emissions mean that we are already locked into continued global warming until at least mid-century, and longer for sea-level rise, there is still opportunity to avoid the worst impacts of climate change if we act urgently through actions across all sectors to make significant significant reductions in global greenhouse gas emissions.</p> <p>(...)</p> <p>While this will require bold and decisive action, there is a need to act carefully, recognising that the costs and</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>benefits of change will not be felt equally across our communities and that provision needs to be made for an equitable transition distribution of these costs and benefits.</p>
S30.004	Chapter 3.1A: Climate change	Objective CC.1	Oppose	<p>While Council supports the general intent of this objective, it is very broad and ambitious. This objective is not achievable within the scope of an RPS or the RMA framework, particularly since territorial authorities are unable to require existing use or development to change and can only do so for new subdivision, use and development. Much more specificity is required if this objective is to be measurable, achievable or realistic.</p> <p>It is unclear what some of these terms mean as there are no definitions.</p>	Amend the objective so that the outcomes sought are achievable within the scope of an RPS. Provide definitions for low-emission and climate-resilient.
S30.005	Chapter 3.1A: Climate change	Objective CC.2	Oppose	<p>As drafted it is unclear what this objective means. It is unclear how costs and benefits should be shared fairly, and who they should be shared fairly between. There is no lower level policy guidance to meaningfully support the objective.</p> <p>While Council supports what we think the general intent of this objective is, it is not achievable within the scope of a RMA document, nor the functions of the regional council or territorial authorities under the RMA. It is also not measurable as an objective. We query whether this is more appropriate within a Long Term Plan.</p>	Delete this objective, or otherwise amend the objective so that the outcomes sought are achievable within the scope of an RPS, including providing policy direction on the concept of sharing costs and benefits fairly.
S30.006	Chapter 3.1A: Climate change	Objective CC.3	Oppose	<p>While Council supports the general intent of this objective, it is not achievable within the scope of a RMA document, nor the functions of the regional council or territorial authorities.</p> <p>There are insufficient levers at a regional/local level to reduce emissions from the existing vehicle fleet to this extent, and many potential measures require national regulation such as subsidies for electric vehicles, increased fuel taxes etc. Further, district plans can only address future use, development and subdivision and cannot require change for existing use and development. Transforming urban land use will take decades.</p> <p>Further, it is not written as an objective and needs to be</p>	Amend the objective so that the outcomes sought are achievable within the scope of an RPS and the functions of regional council and territorial authorities.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				redrafted to make sense: <ul style="list-style-type: none"> • The first part of the sentence is not needed. • It is unclear why there is reference to 2019 in the chapeau, and then 2018 in the three sub-clauses. It is also unclear if the Regional Council has the baseline data to be monitoring this and determining whether it is achieved. • The objective should reference phasing out of coal by 2030 to support policy 2, otherwise there is no objective support for policy 2. 	
S30.007	Chapter 3.1A: Climate change	Objective CC.4	Oppose	This objective is not clear enough as to what is to be achieved, or more so, to what extent are improvements to be achieved. A small minor improvement in one part of the region would achieve this objective. More thought needs to be given as to how this objective is going to be measured. It is not clear whether the focus of the objective is achieving social and environmental outcomes, or the use of nature-based solutions (which is a method to achieve outcomes).	Amend the objective so that it is clear what the outcome sought is.
S30.008	Chapter 3.1A: Climate change	Objective CC.5	Oppose	While Council supports the intent of this objective, it is unclear what type of increase is being sought, an increase by 1ha would achieve this objective on the face of it. There needs to be more clarity about the extent of permanent forest that would meet this objective. The second half of the sentence does not assist the objective, and it is unclear what the intent is. This is the reason for the objective and not the objective itself.	Amend the objective so that it is clear what the outcome sought is, and/or reword as follows: By 2030, there is an increase in the area of permanent forest in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well-being.
S30.009	Chapter 3.1A: Climate change	Objective CC.6	Oppose		Amend the objective so that it is clear what the outcome sought is, and/or reword as follows: Resource management and adaptation planning increase The resilience of communities and the natural environment to the short, medium, and long-term effects of climate change is increased.
S30.010	Chapter 3.1A: Climate change	Objective CC.7	Oppose	This objective is not specific, measurable, achievable, realistic or timebound. This objective also needs reconsideration in line with what can be achieved within the scope of an RPS. It is unclear what outcome is being sought, as people understanding and acting on climate change is a means to an end, not the end itself.	Amend the objective so that it is clear what the outcomes sought are, and that these are achievable within the scope of an RPS.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S30.011	Chapter 3.1A: Climate change	Objective CC.8	Oppose	As a whole, we support the intent and ambition of this objective. However, it is unclear what this objective is seeking to achieve, particularly, as there is no definition provided for climate-resilient. Without a definition, we are also unclear whether the objective is achievable, particularly where district plans can only influence new subdivision, use and development and not require any retrofitting of existing communities. It is also unclear from reading the policies and methods that are assigned to this objective as to how this objective would be achieved. We recommend that GWRC reconsider its achievability, however ambitious, and amend it accordingly.	Amend the objective so that it is clear what the outcomes sought are, and that these are achievable within the scope of an RPS.
S30.012	Chapter 3.4: Fresh water (including public access)	Objective 12	Oppose	<p>This objective repeats the NPS-FM and adds no value to the RPS, the objective should articulate what outcomes are sought for the Wellington Region.</p> <p>It is not necessary or consistent with best practice plan making to repeat what is in higher order documents (including the RMA itself). An RPS should provide regional context for national direction. Further, the objective is too long and unwieldy.</p> <p>While Council is not directly impacted by the two mana whenua statements, Council is concerned to ensure that any new statements that are inserted into the RPS by way of submission or subsequent variation are able to be achieved and implemented. It is unclear what the intent is with the mana whenua statements and what is the intended legal status of them vis a vis the body of the objective itself. Are they intended to be objectives in their own right? There needs to be more clarity provided. The statements contain many objectives and policies within them, which would need to be examined in terms of being measurable, achievable, realistic and relevant, and within scope of the RMA. It is unclear what the status of the policies in the mana whenua statements is in respect to being referred to as being objectives. If they are intended to be objectives in their own right, then they need more work done on them to fit within the RPS; rather than read as a tack-on as they do now. The current framing that the GWRC has provided for the objective is likely to result in considerable confusion in trying to give effect to them. It is recommended that the GWRC promulgate a variation that provides more clarity and certainty as to what</p>	<p><i>[Note: Amendment references Statement of Rangitāne o Wairarapa Te Mana o te Wai expression and Kahungunu ki Wairarapa Te Mana o te Wai expression, after Table 4, Chapter 3.4]</i></p> <p>Amend the objective so that it is clear what the outcomes sought are. These amendments should provide clarity as to the status and purpose of the iwi statements, including their weighting and status compared to the other FW objectives and how any conflicts should be managed. Ensure that any new statements that are inserted into the RPS by way of submission or subsequent variation are able to be achieved and implemented as above.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				Objective 1 of the NPS-FM means within the Wellington Region and reconsiders the framing of the mana whenua objectives in this regard.	
S30.013	Chapter 3.6: Indigenous ecosystems	Objective 16	Oppose	It is unclear over what timeframe this objective is to be achieved, how it is to be measured, and whether it is this gradual or absolute.	Amend the objective so that it is clear what the outcomes sought are.
S30.014	Chapter 3.6: Indigenous ecosystems	Objective 16A	Oppose	It is unclear over what timeframe is this objective to be achieved, how it is to be measured, and whether it is this gradual or absolute. This objective is similar to Objective 16 but frames outcomes sought differently, it could be deleted if objective 16 was amended.	<i>[Note: Reasoning references Objective 16, Chapter 3.6 Indigenous ecosystems]</i> Either delete objective, or amend the objective so that it is clear what the outcomes sought are.
S30.015	Chapter 3.6: Indigenous ecosystems	Objective 16B	Oppose	It is unclear what "decision making" refers to. This needs to be better articulated so that it is plan users are able to determine if it is being achieved or not. As worded, it reads more as a policy than an objective. It needs to be reframed so it is clear what the outcome sought to be achieved is.	Amend the objective so that it is clear what the outcomes sought are.
S30.016	Chapter 3.6: Indigenous ecosystems	Objective 16C	Oppose	It is unclear how or where these values are to be "recognised and provided for". This needs to be better articulated so that it is plan users are able to determine if it is being achieved or not.	Amend the objective so that it is clear what the outcomes sought are.
S30.017	Chapter 3.8: Natural hazards	Objective 19	Oppose	Council support the need to consider effects on the environment, although this duplicates changes to Objective 20.	<i>[Note reasoning references Objective 20, Chapter 3.8, Natural Hazards]</i> Amend the objective to remove duplication with other objectives.
S30.018	Chapter 3.8: Natural hazards	Objective 20	Oppose	It is unclear what this objective is seeking to achieve and could be better worded.	Amend the objective so that it is clear what the outcome sought is, and/or reword as follows: Natural hazard and climate change mitigation and adaptation activities minimise the risks from natural hazards and impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity. Natural hazard and climate change mitigation and adaptation activities do not compromise / are consistent with Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity.

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S30.019	Chapter 3.8: Natural hazards	Objective 21	Oppose	<p>It is unclear what this objective is seeking to achieve and could be better worded to be more certain and measurable. Issues of concern include:</p> <ul style="list-style-type: none"> • It is unclear what 'strengthened' means in this context i.e. strengthened to what degree, to achieve what? • It is unclear what is meant by 'better prepared' i.e. better prepared than what? From what to date? How much better prepared? • Unsure why need to separate out short, medium and long term, and how this concept flows through to the policy direction. • The natural environment covered by objectives 19 and 20 and doesn't need to be mentioned in every objective as the objectives in the RPS should be read as a whole. 	Amend the objective so that it is clear what the outcome sought is.
S30.020	Chapter 3.9: Regional form, design and function	General comments - urban development	Oppose	<p>This chapter needs amendment as:</p> <ul style="list-style-type: none"> • It fails to appropriately give effect to the NPS-UD and to recognise the benefits of urban development. • Objective 22 duplicates other objectives in the RPS. • The objectives and policies create a polycentric urban form with six regionally significant commercial centres, contrary to the NPS-UD. 	Amend the chapter to give effect to the NPS-UD, and increase regulatory certainty.
S30.021	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Oppose	<p>Long introductory statements unnecessarily lengthen a plan which is not consistent with best practice plan making. It is also not necessary to replicate matters covered in section 32 reports.</p> <p>Further, the RPS should use terms that are consistent with the NPS-UD and the national planning standards. For example, regionally significant centres is not a term used in either and should be changed.</p>	<p>Amend introduction to shorten and use language consistent with national direction, and/or reword as follows: Regional form is about the physical arrangement within and between urban and rural communities. Good urban design seeks to ensure that the design of buildings, places, spaces, and networks work well for mana whenua / tangata whenua and communities, and are environmentally responsive.</p> <p>The concept of well-functioning urban environments was introduced in the National Policy Statement on Urban Development 2020. There are a number of characteristics and qualities that contribute to forming a well-functioning urban environment. Well-functioning urban environments enhances the quality of life for residents as it is easier to get around, allows for a greater supply and choice of housing close to where people work or to public transport, and provide vibrant, safe, and cohesive centres that are well connected by public and active transport, and which also enhance business activity. This network of centres support urban intensification. Well-functioning urban environments enable communities and businesses to be more resilient to the effects of climate change, and the</p>

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					<p>uptake of zero and low-carbon emission modes is supported throughout the region. Well-functioning urban environments have compact urban form and are well-designed and planned through the use of spatial and development strategies and use of design guidance. Well-functioning urban environments are low impact, incorporating water sensitive urban design and managing the effects on other regionally significant values and features as identified in this RPS. Central Wellington city contains the central business district for the region and represents the primary regional centre where community, cultural, business and entertainment activities, as well as residential activities are focused. Its continued viability, vibrancy and accessibility are important to the whole region. There are also a other sub-regionally significant centres that are an important part of the region's form. These centres are significant areas of transport movement and civic and community investment activities. They also have the potential to support new development and increase the range and diversity of activities. Good quality high and medium density housing in and around these centres, and existing and planned rapid transit stops, would provide increased housing choice and affordability. Further medium and high density development must be enabled within the fast-growing districts of the Region, being those identified in the National Policy Statement for Urban Development as tier 1 territorial authorities. If this development occurs, it will further improve housing affordability. Encouraging Enabling the use and development of existing centres of business activity can also lead to social and economic benefits, and is necessary to achieving well- functioning urban environments. Additional local employment and educational opportunities around-in these centres could also provide people with greater choice about where</p>

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					<p>they work and obtain skills training. The design of urban and rural communities/smaller centres, the region's industrial business areas, the port, the airport, the road and public transport network, and the region's open space network are fundamental to well-functioning urban environments and regional form.</p> <p>The Wellington Regional Growth Framework provides a non-statutory spatial plan that has been developed by local government, central government, and iwi partners in the Wellington- Horowhenua region. It sets out the key issues identified for urban growth and development and provides a 30-year spatial plan that sets a long-term vision for changes and urban development in the Wellington Region.</p> <p>(...)</p> <p>The region is facing population change and growth pressure. Based on the May 2022 Wellington Regional Housing and Business Development Capacity Assessment (HBA), the Greater Wellington urban environment is expected to grow by around 195,000 people by 2051. As of May 2022, district plans within the Greater Wellington region, does not provide sufficient development capacity for the long term with a shortfall of more than 25,000 dwellings.</p> <p>(...)</p> <p>National direction provided through the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 supports increased supply of affordable housing. However, high levels of development</p>

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					<p>without suitable constraints management risks undermining other characteristics and qualities of a well-functioning urban environment. We There is a need to recognise and provide for other regionally significant values and features, including managing freshwater, indigenous biodiversity, values of significance to mana whenua / tangata whenua and management of the coastal environment. Most of the region, including its existing urban areas, has significant exposure to multiple natural hazards, and there is continuing demand to build in coastal and/or natural hazard-prone areas. Development pressure can reduce transport efficiency and limit the ability of all centres to provide community services and employment. Medium and high density d Development that is enabled through national direction has the potential to result in poor urban design outcomes, in the absence of sufficient design guidance.</p>
S30.022	Chapter 3.9: Regional form, design and function	Objective 22	Oppose	<p>Objective 22 as amended by Proposed Change 1 does not give effect to the NPS-UD, and largely just repeats requirements listed elsewhere in the RPS.</p> <p>In part, this is because it will result in a polycentric urban form rather than an urban form where intensification is located in areas which are best served by public transport and services. For example, Wellington City Centre clearly benefits from the greatest range of public transport than all other centres in the Wellington Region.</p> <p>The language in the Objective also needs to be consistent with the terminology used in the National Planning Standards which have been, or are being, implemented within the District Plans. To use different terminology is confusing and unnecessary and will result in potentially different interpretations and implementation.</p> <p>The objective lacks the necessary precision to enable its meaningful implementation. As it is drafted, it unnecessarily duplicates other objectives within the RPS which need to be considered alongside it. For instance,</p>	<p>Amend the objective so that it is clear what the outcome sought is, and/or reword as follows: The Wellington regional form: A. Is compact, well designed and has good accessibility between housing, employment opportunities, community services, natural spaces, and open spaces, including:</p> <ol style="list-style-type: none"> 1. A network and hierarchy of commercial centres which support the primacy of the Wellington city centre followed by: <ol style="list-style-type: none"> i. Metropolitan Centres; ii. Town Centres; iii. Local Centres; and iv. Neighbourhood Centres; iii. Local Centres; and iv. Neighbourhood Centres; 2. A Regional urban form that is integrated with existing and planned transport network; 3. Commercial and industrial activities distributed in appropriate locations and in a way that supports the commercial centres hierarchy identified in A.1 above; 4. More

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				<p>clause (e) is superfluous, as those objectives in the RPS need to be given effect to irrespective. Similarly clause (f) is addressed through the climate change objectives and policies.</p> <p>Terminology in the RPS also needs to be consistent with Waka Kotahi's One Network Framework (ONF) which has hierarchy for "movement" and "place" and Network Operating Frameworks (NOF).</p>	<p>people living in, and more business and community services located in, areas that are in or near a commercial centre and/or well-served by public transport;5. Urban built environments that meet the health and wellbeing needs of people.B.</p> <p>Supports the competitive operation of land and development markets in ways that contribute to improved housing affordability and business activity, including:1. A variety of homes that meet the needs, in terms of type and location, of different households.2. Sufficient housing and business development capacity in the short and medium term as identified in Table 9A to RPS Objective 22A.3. A range of buildings and sites in appropriate locations that provide opportunities for commercial and industrial activities in a way that achieves the commercial centres hierarchy identified in A.1 above and maintains the primacy of the Wellington city centre.C. Optimises the efficient use of existing infrastructure.</p>
S30.023	Chapter 3.9: Regional form, design and function	Objective 22B	Oppose	<p>As drafted, it is unclear what this objective means. The objective lacks the necessary precision to enable its meaningful implementation. It is unclear what sort of development should be 'strategically planned', or what 'strategically planned' means in this context. The objective should describe what the end result looks like; strategic planning is likely the method to achieve that outcome, not the outcome itself.</p> <p>The second half of the objective refers to the need to consider other objectives and policies in the RPS which is unnecessary if the RPS is read a whole as required. Further, it is unclear how use of the term 'effectively' relates to more specific direction in these policies i.e. where effects are to be avoided. The direction of 'effectively managed' is at odds with protecting significant values and features.</p>	Amend the objective so that it is clear what the outcome sought is. Provide a definition of 'strategically planned'.

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S30.024	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Oppose	<p>Council supports the intent of these changes but seeks changes to improve drafting and therefore implementation by plan users. Issues of concern include:</p> <ul style="list-style-type: none"> • Rules are a method, therefore this (and other policies) should read 'rules and/or other methods'. • 'Phase out' is an objective not a policy. Clause (d) needs to be supported through the relevant objective. If phasing out coal by 2030 is what is sought to be achieved, then this needs to be clear within an objective. 	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: Regional plans shall include policies, and/or rules and/or other methods that:</p> <p>(a) protect or enhance the amenity values of neighbouring areas from discharges of odour, smoke and dust; and</p> <p>(b) protect people's health from discharges of dust, smoke and fine particulate matter; and</p> <p>(c) support industry to reduce greenhouse gas emissions from industrial processes, and</p> <p>(d) phase out by 2030, avoid the ongoing use of coal as a fuel source for domestic fires and large-scale generators by 2030.</p>
S30.025	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation, and due to its drafting and scope represents a high regulatory requirement. Issues of concerns include:</p> <ul style="list-style-type: none"> • District plans cannot regulate how transport infrastructure is operated. The policy needs to be amended to reflect that district plans can only manage the future development, use and subdivision of land. Waka Kotahi and the Regional Transport Committee have a significant role in directing how the network is operated through the Regional Land Transport Plan and through Waka Kotahi's National Land Transport Plan and Waka Kotahi implementation on the GPS on Transport Funding. The other mechanism to deliver these outcomes is activity management plans of road controlling authorities and public transport agencies. Noting that affordability is a big issue for councils such as Porirua City Council with a constrained rating base. • A definition is needed for "transport infrastructure". For example, is a private car parking garage on a residential property a piece of transport infrastructure? • This Policy applies to "all new and altered transport infrastructure" which would unnecessarily capture a very wide range of infrastructure including altered bus stops, small scale repair works, and EV charging points. There is no definition for altered and one needs to be provided to avoid unintended consequences of very small scale alterations being captured. • It is unclear what is meant by "optimising overall 	<p>Delete policy.</p> <p>Alternatively, amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and is within the scope of what can be achieved under RMA.</p> <p>Provide definitions for 'Transport infrastructure' and 'altered' if these terms are retained.</p>

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				<p>transport demand" and how district plans will help achieve this.</p> <ul style="list-style-type: none"> • It is unclear what level of change is required to meet "maximising" mode shift and how this would be measured in the regulatory context of district plan rules. • It is unclear what is meant by "support". How will this be achieved in district plan rules or methods? 	
<p>S30.026</p>	<p>Chapter 4.1: Regulatory policies</p>	<p>Policy CC.2: Travel demand management plans - district plans</p>	<p>Oppose</p>	<p>Council opposes this policy and seeks its deletion. The policy requirement represents a piecemeal "ambulance at the bottom of the cliff" approach. It is more effective to intervene at an earlier stage in the development process by requiring:</p> <ul style="list-style-type: none"> • Regulatory land use frameworks that manage the distribution of activities across urban environments in a way that achieve Objective 3 to the NPS-UD. • The location of urban subdivisions together with subdivision design enable people to have a choice in transport modes. • Good quality urban design that ensures new developments are laid out and/or incorporate features that encourage active and public transport usage. <p>The policy applies equally to "out of zone" development as much as "in-zone" development, and in so doing fails to incentivise or recognise the location of developments. For example, a new office building in the Porirua Metropolitan Centre Zone is already well served by active and public transport modes yet it would be required to incur consenting costs in producing a travel demand management plan as would an "out of zone" office building in a rural zone.</p> <p>The policy also cannot address operational issues that present barriers to active and public transport usage such as ticketing policies, fares, levels of services etc. As such it alone cannot "maximise" use of public and active transport modes.</p> <p>The policy only requires that a travel demand management plan is produced. It is silent on the implementation of such plans nor what happens if the plan fails to maximise the use of public and active modes, for example due to people's preferences.</p> <p>Travel demand management plans are just a type of method to implement the policy and should be deleted</p>	<p>Delete policy. OR</p> <p>Alternatively, amend policy so that it provides appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>Policy CC.2: Travel demand management plans Increased reliance on public transport and active transport modes - district plans</p> <p>By 30 June 2025, district plans shall include objectives, policies and rules that:</p> <p>(a) require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions; and (b) minimise reliance on private vehicles.</p>

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				from the policy. Rather, the policy needs to be reframed to provide direction on increasing the use of public transport and active modes.	
S30.027	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Oppose	<p>Council supports the intent of this policy and has already attempted to enable multi-modal transport through the Infrastructure Chapter in our Proposed District Plan.</p> <p>However, it is also not clear what infrastructure is included in this policy. For example, new roads and multi-lane state highways would support the use of electric vehicles. It is unclear if the intention is for these to be enabled in district plans.</p> <p>To implement the policy, a definition of zero and low-carbon multi-modal transport is required, with inclusions.</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives. Define 'zero and low-carbon multi-modal transport', with inclusions.
S30.028	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	<p>The policy is implemented by another policy it refers to. It needs to be clearer to the exact actions to be undertaken.</p> <p>The policy relies on an understanding of what a climate-resilient* urban area is (which is not currently identified in the RPS) and has the effect of elevating Policy CC.14 from a "consider" policy to a "shall" policy without the necessary level of justification.</p> <p>While the explanation to the policy sets out what is intended by a climate-resilient urban area, this description is unclear and lacks the necessary certainty for regulatory controls in RMA plans. For example, it is unclear what is meant by "withstand" as used in this context, it is also unclear how is this to be measured and how will we know when we have created urban environments that can withstand the conditions listed in the explanation. It also assumes that all tools and levers are in RMA plans and fails to identify the role of other tools which lie outside of the control of RMA plans, such as:</p> <ul style="list-style-type: none"> • the Building Code; • three water policies under the new Three Water entities; and • management of public spaces such as transport corridors, parks and reserves, and the DOC estate. <p>The policy should be drafted in way that recognises that RMA plans can contribute to achieving climate-resilient urban areas, but they alone cannot achieve them.</p>	Delete policy. OR Alternatively, amend policy so that it provides clear and appropriate direction to plan users in line with objectives. Define 'resilient' and 'climate-resilient'.

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				<p>*Resilient is used 55 times in Proposed Change 1 document and resilience is used 51 times. No definition is provided for these terms. It is important that terms intended to directly determine regulatory frameworks in regional plans and district plans are rigorously developed and understood, and properly explained and/or provided with a definition in the RPS.</p>	
S30.029	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>It is unclear why this policy is just focused on avoiding increased emissions, rather than seeking a reduction. If agriculture makes up 34% of greenhouse gas emissions it is not possible to achieve Objective CC.3 without a significant reduction in emissions from this sector.</p> <p>Further, it is not clear why there is a different treatment for agriculture than urban development. This seems inequitable and contrary to the objective CC.2 that seeks that the costs and benefits are shared equally and fairly across the region.</p> <p>The explanation refers to central government taking a lead in emissions reduction through the Emissions Trading Scheme (ETS). Notwithstanding that agriculture is not currently subject to the ETS, the same argument could be made for achieving modal shift in urban environments as the ETS does already apply to petroleum. Explanation outlines that this is a minimum backstop for agricultural emissions. If that is the purpose of these policies, then should that not also apply to transport? Other national directives provide the true levers, and the policy simply provides a backstop of the absolute minimum.</p>	Amend policy so that it provides an equitable approach for sectors in achieving greenhouse gas emissions targets in line with the objectives.
S30.030	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	<p>Council supports the intent of this policy. However, is unclear what 'support' means in this context, and 'enable' or 'require' may be more appropriate. For example, as the relevant objective seeks that there is an increase, the term 'supporting' may be insufficient. As raised with the corresponding objective, the amount of 'increase' needs to be articulated.</p> <p>The text requested to be deleted is not needed, as it is simply repeating the objective.</p> <p>While Council agrees with the intent to encourage indigenous forest restoration to allow greater biodiversity and soil reclamation, we note that this policy could</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of permanent forest in the region to contribute to achieving net-zero greenhouse gas emissions by 2050 , while:

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				<p>potentially impact carbon farming where permanent exotic forests are used. Exotic forest has a greater storage of carbon, both in the short and long term. Council understands that there is some uncertainty in national policy with regard to whether permanent exotic forest should or should not get ETS credits.</p>	
S30.031	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	<p>Council supports the intent of this policy, and has already attempted to enable 'soft- engineering measures' in our Proposed District Plan. This is defined clearly as follows: means a form of hazard mitigation that uses natural elements to provide protection to private properties, public space and infrastructure. It includes sacrificial fill, vegetation planting, beach nourishment and dune restoration.</p> <p>The definition of 'nature-based solution' relies on a common understanding of a number of terms used in that definition, such as "actions", "natural ecosystems", "natural elements", and "resilience", since those terms are not themselves defined.</p> <p>Further, a lack of clarity and regulatory certainty with this policy would likely lead to interpretation issues, and could require a regulatory framework that applies to all development regardless of scale and regardless of activity type. The s32 evaluation report does not identify why this level of regulatory reach is appropriate.</p> <p>It is difficult to reconcile the examples used in the definition with the creation of a regulatory framework that captures all development and infrastructure regardless of scale, as required by Policy CC.7.</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, including what is meant by "actions", "natural ecosystems", "natural elements", and "resilience".
S30.032	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	<p>This policy needs to be redrafted to be clearer and more certain and be supported by guidance and implementation support.</p> <p>District plans do not currently require the offsetting of greenhouse gas emissions, so it is unclear why policy direction is needed to discourage it. Emissions offsetting is addressed through the ETS. Territorial authorities do not have capability and capacity to implement GHG offsetting regimes. Nor do they have the function under s31 to address discharges of greenhouse gases. This is a regional council function.</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: District and regional plans shall include objectives, policies, rules and/or methods to that prioritise reducing greenhouse gas emissions in the first instance and only provide for offsetting in circumstances where: [...] rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply. Amend the RPS include a method requiring the regional council to publish guidance on how this policy is to be implemented and, on the type, and scale of activities to

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				<p>If district plans should be contemplating offsetting, the RPS needs to provide direction as to when it may be appropriate and how it should be undertaken, including how this relates to the ETS. That will reduce the extent of different approaches taken between councils and the amount of potential litigation.</p> <p>The explanation refers to 'hard-to-abate' sectors - what these are should be set out in the policy itself.</p>	which the policy will apply.
S30.033	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support	Council supports being consistent with the NZCPS.	Retain as notified.
S30.034	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Oppose	Low and zero carbon regionally significant infrastructure needs to be defined to improve clarity and regulatory certainty.	'Low and zero carbon' 'regionally significant infrastructure' needs to be defined to improve clarity and regulatory certainty.
S30.035	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Oppose	It is unclear why this policy only requires policies and/or methods.	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: District and regional plans shall include objectives, policies, rules and/or other methods that recognise:

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S30.036	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Council supports that the lead for this policy should be the Regional Transport Committee, and outcomes be delivered through the Regional Land Transport Plan. Noting that affordability is a big issue for councils such as Council with a constrained rating base.	Retain as notified.
S30.037	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Council supports that the lead for this policy should be the Regional Transport Committee, and outcomes be delivered through the Regional Land Transport Plan. Noting that affordability is a big issue for councils such as Porirua City Council with a constrained rating base.	Retain as notified.
S30.038	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	<p>Council supports that these matters are addressed in a regional plan in accordance with the regional council's s30 functions.</p> <p>However, this policy unnecessarily duplicates requirements set out already in the NPS- FM, the role of an RPS should be to articulate what national direction means at a regional level. It is unclear what value is added by the inclusion of this policy.</p> <p>Also, clause (g) specifies a method which is not required as this is already listed in the chapeau of the policy.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: Regional plans shall give effect to <i>Te Mana o te Wai</i> and include objectives, policies, rules and/or methods that:</p> <ul style="list-style-type: none"> (a) are prepared in partnership with mana whenua/tangata whenua; (b) achieve the long-term visions for freshwater; (c) identify freshwater management units (FMUs); (d) identify values for every FMU and environmental outcomes for these as objectives; (e) identify target attribute states that achieve environmental outcomes, and record their baseline state;

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					<p>(f) set environmental flows and levels that will achieve environmental outcomes and long-term visions;</p> <p>(g) identify limits on resource use including take limits that will achieve the target attribute states, flows and levels and include these as rules;</p> <p>(h) identify non-regulatory actions that will be included in Action Plans that will assist in achieving target attribute states (in addition to limits); and</p> <p>(i) identify non-regulatory and regulatory actions in Action Plans required by the NPS-FM</p>
S30.039	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions.</p> <p>Council generally supports the intent of this policy. However, this policy needs to be drafted as a policy rather than a statement, and listed items need to grammatically link to the chapeau of the policy. It also duplicates a number of other policies in the RPS, for example, clause (e) duplicates Policy 15, clause (i) duplicates (and is inconsistent with) Policy 18(o).</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: Regional plans shall include objectives, policies, rules and methods-including rules, must that give effect to <i>Te Mana o te Wai</i> and in doing so must:</p> <p>(a) Enable the active involvement of mana whenua/ tangata whenua in freshwater management (including decision-making processes); and</p> <p>(b) Identify and provide for Māori freshwater values are identified and provided for;</p> <p>(c) Require the control of both land use and discharge effects from the use and development of land on freshwater and the coastal marine area;</p> <p>(d) Achieve the target attribute states set for the catchment;</p> <p>(e) Require the development, including stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan;</p> <p>(f) Require that urban development is designed and constructed using the principles of Water Sensitive Urban Design;</p>

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					<p>(g) Require that urbandevelopment located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours;</p> <p>(h) Require that urbandevelopment is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; (i) Require riparian buffers for all waterbodies and avoid to the piping of rivers;</p> <p>(j) Require <i>hydrological controls</i> to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;</p> <p>(k) Require stormwater quality management that will minimise the generation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater; and</p> <p>Identify and map rivers and wetlands.</p>
S30.040	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	<p>It is important that controls in District Plans do not duplicate those in the Regional Plan. Unlike District Plans, Regional Plans can control both land uses and discharges and as such are the primary tool for achieving target attribute states for water bodies.</p> <p>The policy should be split into two policies so it is clear what the Regional Plan should cover and what district plans should cover. Otherwise, it lacks regulatory certainty as district plans do not have the jurisdiction to address everything they are being required to by this policy.</p> <p>The qualifier "to assist" is being sought as regulation can and should be used to assist in achieving target attribute states, but by themselves they can't achieve them.</p> <p>The policy also needs to provide clearer direction as to what providing for mana whenua and their relationship actually means in respect of earthworks and vegetation disturbance. As it is worded, all it does is repeat s6(e) of</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives. It should be split into two policies so it is clear what the Regional Plan should cover and what district plans should cover; and/or reword as follows:</p> <p>Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to minimise the extent necessary to assist in achieving the target attribute states that are set in the Regional Plan for water bodies and freshwater ecosystems including the effects of these activities on the life-supporting capacity of soils, and to provide for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</p>

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				the RMA and adds no value.	
S30.041	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Council supports the inclusion of marae.	Retain as notified.
S30.042	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>These are very strong policy directions that go beyond and are stricter than what is in the NPS-FM. There are no exceptions here, and no hierarchy provided for when directions are not practicable.</p> <p>Some clauses unnecessarily duplicate directions in the NPS-FM without providing additional direction in a regional context, they also duplicate other policy directions in this RPS including policy 14.</p> <p>Several clauses have a different construct to the rest of the clauses and don't flow from "including" in the chapeau.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of waterbodies, including:</p> <p>(a) managing freshwater in a way that gives effect to <i>Te Mana o teWai</i>;</p> <p>(b) actively involve mana whenua / tangata whenua in freshwater management (including decision-making processes), and</p> <p>(c) identify and provide for Māori freshwater values are identified and provided for;</p> <p>(d) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their <i>restoration</i> is promoted;</p> <p>(e) achieving environmental outcomes, target attribute states and environmental flows and levels;</p> <p>(f) avoiding the loss of river extent and values;</p> <p>(g) protecting the significant values of outstanding waterbodies;</p> <p>(h) protecting the habitats of indigenous freshwater species are protected;</p> <p>(i) Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;</p> <p>(j) promoting the retention of in-stream habitat diversity by retaining natural features - such as pools, runs, riffles, and the river's natural form;</p>

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					(k) promoting the retention of natural flow regimes - such as flushing flows; (l) promoting the protection and reinstatement of riparian habitat; (m) promoting the installation of off-line water storage; (n) measuring and evaluating water takes; (o) restricting the reclamation, piping, straightening or concretelining of rivers; (p) discourage restricting stock accessto estuaries, rivers,lakes and wetland; (q) restricting the diversion of water into or from wetlands -unless the diversion is necessary to restore the hydrological variation to the wetland;—(r)-restricting the removal or destruction of indigenous plants in (s) restoring and maintaining fish passage
S30.043	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support	Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions.	Retain as notified.
S30.044	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Oppose	Council supports the policy intent of reducing water demand. However, the policy lacks the necessary precision to enable its meaningful implementation, directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concerns include: <ul style="list-style-type: none"> • It is not within the knowledge of a territorial authority to identify the per capita efficiency of the end use of water. • District plans can only manage the use, development, and subdivision of land. Council's PDP requires water meters for new buildings through the Three Waters Chapter, but it is not clear how this would extend to requiring how water is used by individuals. This is not possible through a district plan. • The policy seems to require that district plans require individuals to use their grey water over potable water in certain circumstances. It is questionable whether this is an appropriate matter for a district plan to address in terms of 	Amend policyso that it provides clear and appropriate direction to plan users in linewith objectives, and/or reword as follows: District plans shallinclude policies, rulesand/or methods to reduce demandof waterfrom registered water suppliers and users, includingwhere practicable: <ul style="list-style-type: none"> (a) provisions improving requiring improvements to the efficiency of the end use ofwater on a per capita basis for new developments; and (b) provisions requiring alternate water supplies for non-potable use in new developments. Include a definition of 'registered watersuppliers'.

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				<p>s31 of the RMA, and whether it would be better addressed in a regional plan. There is also duplication between FW.1 and FW.2 in respect of provisions requiring efficient end use of water for new development and alternate water supplies for non-potable uses.</p> <ul style="list-style-type: none"> • Development is not defined, and the policy is not calibrated to any particular scale of development. As such it would require a far-reaching regulatory framework that has not been justified in the s32 Evaluation for the RPS • Suggest deletion of the reference to provisions as these are methods. • It is unclear what is meant by "reduce demand of water from registered water suppliers and users". 	
S30.045	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation and directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concern include:</p> <ul style="list-style-type: none"> • Reference to clause 3.5(4) is not helpful and duplicates the NPS-FM. The purpose of the policy should be to set out the regional direction that councils are to follow, and how Te Mana o te Wai is to be implemented. Regional councils through their RPS and regional plans are required to set out what Te Mana o te Wai is and means. • (a): the requirement to partner with mana whenua in the development of district plans is broader than what this policy addresses. It is already a requirement of s8 of the RMA, if it is to be repeated in the RPS it should be a separate overarching policy. And in doing so, there needs to be clear direction as to what this means. • (b): It is unclear how or why district plans should be protecting and enhancing Māori freshwater values if they are protected through a regional plan. • (c): Again, this is a broader obligation on TAs irrespective under s6(e) of the RMA, and this clause does not add any value or guidance. It should sit as a separate policy with some actual guidance and direction. • (d): the effects of urban development on what? This needs to provide guidance as to what is required to be considered. • (g): To what extent? and what aspects/effects need to be covered that aren't addressed by Regional Plan provisions? There is no guidance in the RPS as to what 	<p>Delete policy. OR</p> <p>Alternatively, amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and delete (g), (h), (o), (p) and (q). Amend the explanation as follows: Explanation Policy FW.3 requires district plans to manage the effects of urban development on freshwater and the coastal marine area. This is to the extent that is relevant under a territorial authority's functions under section 31 of the RMA and in a manner that does not duplicate the functions of the Regional Council under section 30 of the RMA.</p>

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				<p>this may mean.</p> <ul style="list-style-type: none"> • (h): How does the regional council envisage this occurring? There is no guidance in the RPS as to what this may mean. • (i): The two parts of this clause are unclear as to what is exactly proposed here. • (k): The RPS needs to contain guidance and direction about what sort of protection and enhancement is envisaged here, beyond what is already controlled through the Regional Plan. • (l): This clause seems to repeat clause k above. Guidance should be provided on the size and nature of these buffers, i.e. on the face of this clause a district plan could impose a 1cm buffer and it has given effect to it. It should also set out what the buffer is for, i.e. natural character, habitat protection? Regulating the piping of streams is a regional council function. • (o): Minimise the extent of impervious surfaces for what reason? Also, isn't this already covered by clause (i)? The discharge of contaminants is a regional council function under s30 of the RMA. • (p): The daylighting of streams is a regional council function. • (q): It is unclear what is sought beyond what is already managed by the Regional Council through the NES-DW. 	
S30.046	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>Council does not use financial contributions as a regulatory tool in our district plan as they are inefficient, and they duplicate our existing approach of requiring development contributions and developer agreements administered under the Local Government Act.</p> <p>The policy needs to be reworded as it lacks the necessary precision to enable its meaningful implementation.</p> <p>The advice note should be deleted as it is incorrect, we are unaware of where in the RMA these Government departments are exempt from paying financial contributions.</p> <p>The explanation note also does not provide much value.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: Except where required through a Development Contributions Policy, District plans shall include policies and rules that require the payment of financial contributions for the provision of off-site stormwater quality and quantity treatment, where that treatment is identified in a financial contributions to be applied to subdivision and development as a condition of the resource consent where off site stormwater quality and quantity treatment is required, as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the</p>

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					<p>contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose. Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence. Explanation Policy FW.4 requires financial contributions, or alternatively development contributions to be collected for the construction of catchment scale stormwater solutions, so that new urban development pays their fair share.</p>
S30.047	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>Council supports this policy being timebound in principle. It has already been given effect to through our Proposed District Plan (PDP). However, Policy EI.1 requires a first principles approach to SNA identification and protection which would make it challenging for any council to meet this.</p> <p>The government has released an exposure draft of the NPS-IB which sets out additional requirements and a longer implementation timeframe. The RPS should align with these if/when the NPS-IB is gazetted.</p>	<p>Amend policy to either:</p> <ul style="list-style-type: none"> • remove 2025 time frame; or • align with NPS-IB timeframes once gazetted; or • provide for councils that have mapped and protected all SNA in their plan to give effect to this policy through their next full district plan review.
S30.048	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>Council supports this policy being timebound in principle. It has already been given effect to through our PDP. However, Policy EI.1 requires a first principles approach to SNA identification and protection which would make it challenging for any council to meet this.</p> <p>The government has released an exposure draft of the NPS-IB which sets out additional requirements and a longer implementation timeframe. The RPS should align with these if/when the NPS-IB is gazetted.</p>	<p>Amend policy to either:</p> <ul style="list-style-type: none"> • remove 2025 time frame; or • align with NPS-IB timeframes once gazetted; or • provide for councils that have mapped and protected all SNA in their plan to give effect to this policy through their next full district plan review.
S30.049	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua /	Support	<p>The requirement to partner with mana whenua in the development of district plans is broader than what this policy addresses. It is already a requirement of s8 of the RMA, if it is to be repeated in the RPS it should be a</p>	<p>Either delete this policy, or amend in line with the gazetted NPS-IB but only where it will provide</p>

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		tangata whenua roles and values when managing indigenous biodiversity - district and regional plans		<p>separate overarching policy. Such a policy should also provide meaningful direction as to the actions that should be taken in respect of partnering.</p> <p>Further, it is possible that this policy will not align with the NPS-IB, the exposure draft released by the Government did not allow the effects management hierarchy to be applied to a broad range of effects including any removal of indigenous vegetation.</p>	additional guidance at a regional level in consultation with mana whenua.
S30.050	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	<p>Council supports taking a risk-based approach to natural hazard management, the Proposed Porirua District Plan takes this approach which is in line with national best practice.</p> <p>It is unclear what direction is sought in terms of the use of the term 'manage' in this context. Is it to ensure that there is no increased risk to people or properties?</p> <p>In regard to (b), amending the policy to require identification of low, medium or high hazards would be consistent with a risk-based approach to hazard management. The qualifier "at least" is requested as some hazards can have a return period of greater than 1:100 years but still be considered high, medium or low hazard risk such as fault lines.</p> <p>In regard to (d) it is unclear what would constitute an "extreme" risk and how it should be managed differently from a "high" risk. Council considers that the categorisation of low, medium or high risk is consistent with a best practice risk-based approach to natural hazard management.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: Regional and district plans shall include objectives, policies, rules and / or other methods that:</p> <p>(a) identify areas affected by natural hazards; and</p> <p>(b) use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over at least a 100 year planning horizon, which identifies the hazards as being low, medium or high;</p> <p>(c) include objectives, policies and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and</p> <p>(d) include objectives, policies and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.</p>
S30.051	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant	Oppose	<p>This policy needs to align with national planning standard zones rather than introducing new terms. The RPS should give better guidance on how the NPS-UD should be implemented in a Wellington region context.</p> <p>The notified policy will result in a polycentric urban form rather than an urban form where intensification is located in areas which are best served by public transport and services.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres Wellington regional form - commercial centres hierarchy- district plans District plans shall include objectives, policies, rules and/or other methods that identify and manage subdivision, use and</p>

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		centres - district plans		<p>Wellington city centre is the primary centre in the Wellington region and is to continue to be the main focus for a wide range of commercial activity, community activities, cultural activities, visitor accommodation, as well as high density residential activity.</p> <p>The other key centres also provide significant business, retailing and community services, as well as residential opportunities. The requested amendments to this policy do not limit territorial authorities from identifying additional centres of local significance within their district plan.</p>	<p>development in the centres listed below in a way that recognises and maintains the viability and vibrancy of:</p> <ol style="list-style-type: none"> 1. The regionally significant Wellington city centre; 2. The sub-regional metropolitan centres at:a. Upper Huttb. Lower Huttc. Porirua. Paraparumue. Masterton 3. The locally significant town centres at:a. Petoneb. Kilbirniec. Johnsonville. Ōtaki. Waikanae. Featherston. Greytown. Featherston. Carterton. Martinborough 4. Other local and neighbourhood centres that provide for the daily and weekly needs of their residential catchments. <p>Explanation Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region. These centres are of significance to achieving a well-functioning urban environment for Wellington and a compact regional form, including by ensuring that urban intensification occurs in a coherent and consistent manner across the region. By identifying these centres and in enabling their planned purpose and role in the urban environment and wider region, Policy 30 is intended to help achieve a regional form that deliver other outcomes identified in the RPS. This includes, reducing greenhouse gas emissions, ensuring an equitable access to commercial and community services, economic development, and land use-transport integration. They also support the economic, social and cultural well-being of communities. District Plans are required to identify these centres and include provisions that enable them to achieve their planned purpose and role. Maintaining and</p>

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					<p>enhancing the viability and vibrancy of these centres is important to encourage investment and development that supports an increased range and diversity of activities. It is also important for their prosperity and resilience in the face of social and economic change. Wellington city centre is the primary centre in the Wellington region and is to continue to be the main focus for a wide range commercial activity, community activities, cultural activities, visitor accommodation, as well as high density residential activity. The other key centres also provide significant business, retailing and community services, as well as residential opportunities. This policy does not limit territorial authorities from identifying additional centres of local significance within the district plan.</p>
S30.052	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	The amendments to this policy just duplicate the requirements of the NPS-UD and do not add value in the context of the Wellington Region. It should be rewritten in line with relief sought in relation to Policy 30 to give regional guidance on the implementation of the NPS-UD.	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: Policy 31: Identifying and enabling a range of building heights and density Wellington regional form - urban intensification - district plans District plans shall include objectives, policies, rules and/or other methods that identify and enable urban intensification, including building heights and built form density, in a way that: 1. For Wellington city centre: Realises as much development capacity as possible to maximise the benefits of intensification in this regionally significant centre; 2. For Metropolitan centres identified in Policy 30: Reflect demand for housing and business activity in these locations, but at a minimum, building heights of at least 6 storeys; 3. Within and adjacent to locally significant town centres identified in Policy 30 and other centres: Reflect the purpose of these centres</p>

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					<p>and their planned level of commercial activities and community services; and4. Provide for building heights of at least 6 storeys in areas that are within a walkable catchment of the edge of the Wellington city centre, or the edge of a Metropolitan centre identified in Policy 30, or an existing or planned rapid transit stop as identified in the Regional Land Transport Plan.5. For any other territorial authority not identified as a tier 1 territorial authority, identify areas for greater building height and density where:a. there is good access to existing and planned active and public transport to a range of commercial activities and community services; and/orb. there is relative demand for housing and business use in that location.ExplanationPolicy 31 directs the identification of areas suitable for intensification across the Wellington urban environment and wider region, and the level of intensification in these areas. In so doing it gives effect to Policy 3 of the National Policy Statement on Urban Development 2020 in way that ensures that Wellington has a well-functioning urban environment and compact regional form. Policy 31 also enables greater building height and densities to be provided for in non-tier 1 territorial authorities which includes Masterton being a tier 3 territorial authority as well as Carterton and South Wairarapa. Providing for this development is consistent with Policy 5 of the National Policy Statement on Urban Development 2020.</p>
S30.053	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling	Oppose	The policy should be amended to provide clear direction on how a territorial authority is to determine a walkable catchment, so that there is a consistent regional	Include definitions for 'rapid transit stop' and 'walkable catchment'.

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		a range of building heights and density - district plans		<p>approach.</p> <p>The RPS should also either include a definition of a rapid transit stop, or the policy should provide clear direction as to how a rapid transit stop is determined.</p>	
S30.054	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support in part	<p>Council generally supports this policy as industrial activities are an important part of our local economy and they can be compromised by inappropriate use, development and subdivision.</p> <p>Delete comma as it does not make sense grammatically.</p>	<p>Amend policy as follows: District plans should shall include policies, rules and/or methods that identify and protect key industrial-based employment locations where they contribute to the qualities and characteristics of well-functioning urban environments by:</p> <ul style="list-style-type: none"> (a) Recognising the importance of industrial based activities and the employment opportunities they provide. (b) Identifying specific locations and applying zoning suitable for accommodating industrial activities and their reasonable needs and effects including supporting or ancillary activities. (c) Identifying a range of land sizes and locations suitable for different industrial activities, and their operational needs including land-extensive activities, (d) Managing the establishment of non-industrial activities; in industrial zones, by avoiding activities likely to result in reverse sensitivity effects on industrial activities, or likely to result in an inefficient use of industrial zoned land or infrastructure.
S30.055	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Oppose	<p>Council supports this policy in principle, the Proposed Porirua District Plan seeks to enable papakāinga developments, introduces a Māori Purpose Zone for Hongoeka, and generally better enables the use and development of ancestral lands.</p> <p>There needs to be a definition in the RPS of what constitutes ancestral land, to provide clarity as to what land exactly this policy applies to considering how land owned by both mana whenua and maata waka should be treated.</p> <p>In regard to (a) if this clause is intended to apply to land that is not ancestral, then this clause does not flow from the chapeau of the policy. It needs to be another clause to this policy i.e.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: District plans shall include objectives, policies, rules and/or methods that provide for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land, by:</p> <ul style="list-style-type: none"> (a) enabling mana whenua / tangata whenua to exercise their Tino Rangatiratanga; and (b) recognising that marae and papakāinga are a Taonga and making appropriate provision for them; and (c) recognising the historical, contemporary, cultural, and social importance of papakāinga; and (d) if appropriate, identifying a Māori Purpose Zone; and (e) recognising Te Ao Māori and enabling mana whenua /

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				(a) ancestral land (b) general land owned by Māori	tangata whenua to exercise Kaitiakitanga and their Tino Rangatiratanga ; and (f) providing for the development of land owned by mana whenua / tangata whenua.
S30.056	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Oppose	<p>While this policy will have less or greater weight, and relevance with consents, saying that an application for a height to boundary infringement needs to have particular regard to these matters is too onerous. There should be some level of scale built in.</p> <p>In regard to clause (a), the requirement to partner with mana whenua in the development of district plans is broader than what this policy addresses. It is already a requirement of s8 of the RMA, if it is to be repeated in the RPS it should be a separate overarching policy.</p> <p>It is unclear what is meant by 'upholding Māori data sovereignty' - this term needs to be explained or defined.</p>	Amend policy so that it provides clear and appropriate direction to plan users inline with objectives, including being specific about what scale of consents it should apply to. Amend RPS to provide a definition or explanation of 'Māori data sovereignty'.
S30.057	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation, directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concerns include:</p> <ul style="list-style-type: none"> • It does not achieve the purpose of the RMA. The purpose is to promote the sustainable management of natural and physical resources. This is to be done in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while meeting the three environmental bottom lines set out in s5 to the RMA. The purpose does not require that this is done in an equitable or inclusive way. • It does not identify how potential tensions between having to give effect to other objectives and policies of the RPS and ensuring an "equitable and inclusive way" are to be reconciled if they arise. • It requires a common understanding and agreed baseline on what existing inequities exist. Without this it cannot be determined when a resource consent, variation or plan change would exacerbate an existing inequity. There are examples of inequities, but not an exclusive list. This could be construed very broadly to address social 	Delete policy.

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				<p>inequities that are well beyond the ability of any RMA decision to address. This needs to be more clear, certain and defined to avoid legal challenges on things that cannot be managed through the RMA.</p> <ul style="list-style-type: none"> Regional council or territorial authorities cannot manage access to public transport, amenities and housing through a resource consent or a plan change. This is quite a step change to be requiring a council through a consent to consider how a housing development in one area for example is not exacerbating lack of access to housing in another. There is no definition of "environmental issues" provided for this policy. The definition of "environment" in the RMA is broad and includes all natural and physical resources, amenity values, ecosystems and their constituent parts. This needs to be more certain, including specifying the degree to which "environmental issues" should not be exacerbated. The requirement not to exacerbate "environmental issues" is both uncertain and draconian given the RMA broad definition of "environment" and lack of any policy guidance on what an "issue" is nor any direction of degree of exacerbation to be considered before a resource consent, variation or plan change would fail this test. Section 5 of the RMA requires that the needs of future generations are met, so "not increasing the burden" could be seen as a lower bar. However, the policy does not provide any direction on guidance on what is meant by "burden" in clause (d), burden of what exactly? This needs to be more clear and certain. Unlike IM.1, this refers to just notified consents. It is unclear why there is a discrepancy between notified and non-notified consents in these policies. 	
S30.058	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation, directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concern include:</p> <ul style="list-style-type: none"> No threshold is included and as drafted would apply to all resource consents, change, variation or review of RMA plans regardless of scale and type of activity. For example, a dormer window breaching a height in relation to boundary standard in a district plan would trigger this policy. 	<p>Delete policy. OR Alternatively, amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and ensures the requirements are within the scope of what a district plan can achieve.</p> <p>Amend policy to only apply to resource consents.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<ul style="list-style-type: none"> • It is unclear what is meant by "optimise overall transport demand", this policy needs greater clarity to allow it to be implemented. • Relief sought in relation to Policy CC.2 applies equally in relation to Policy CC.9. • This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans. 	
S30.059	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose	<p>Council opposes policy as it is simply encouraging information be included in Assessments of Environmental Effects for resource consents and supporting information for RMA plans. Issues of concern include:</p> <ul style="list-style-type: none"> • It is unclear how this relates to a plan change/variation/review - the term "submitted with an application" suggests that the intention was for this policy to apply to resource consents. • The policy or method needs to clarify what type and scale of infrastructure would trigger this encouragement since as drafted it would apply to anything from a new EV point or a new bus stop up to a new Motorway. Without a scaled approach to a Whole of life carbon assessment, or tools that planners can use to conduct one, its application would be inconsistent at best and useless at worst. • It should only come into effect after the regional council has published guidance and an appropriate methodology for identifying and measuring the total volume of greenhouse gases emitted at different stages of a project lifecycle. Territorial authorities do not have the necessary expertise to review and test a carbon emissions assessment. • A whole of life carbon emissions assessment is a method to implement the policy. There is no definition of what a whole of life carbon emissions assessment is. If this term is to be retained, then it needs to be defined. 	<p>Delete policy. OR Alternatively, amend policy to be a non-regulatory method, and ensure that it provides clear and appropriate direction to plan users in line with objectives.</p> <p>If the term "whole-of-life carbon emissions assessment" is to be retained, it needs to be defined.</p>
S30.060	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-	Oppose	<p>Council opposes Policy CC.12 and seeks its deletion for the following reasons:</p> <ul style="list-style-type: none"> • This policy is unclear as to its intent and how it is supposed to be engaged for resource consents, plan changes/variations or reviews. • It relies on definitions for "nature-based solution", "climate change adaptation" and "climate change mitigation" which lack the necessary 	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives, and amend policy to only apply to resource consents.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		based solutions to climate change - consideration		<p>specificity, certainty and clarity required for terms used in a RMA regulatory framework (see Council submission points on these definitions).</p> <ul style="list-style-type: none"> • Due to uncertainty created by the definitions combined with the low effects threshold, application of this policy as a consideration will have a regulatory reach that has not been justified by the s32 evaluation. • The requirement to avoid adverse effects is a high regulatory bar considering the definition of 'nature-based solution' applies to everything from estuaries and rivers to street trees. "Avoid" is a higher regulatory bar than that sought by the RPS for SNA which provides for the application of the effects management hierarchy. • Includes an effects threshold unrelated to the outcome sought in Objective CC.4. • This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans. 	
S30.061	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	The policy needs to be specific to regional council as the clauses relate solely to regional council functions in respect to greenhouse gas emissions.	<p>Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives; and/or reword as follows:</p> <p>When considering an application for a resource consent from the regional council, associated with a change in intensity or type of agricultural land use, particular regard shall be given to:</p> <p>(a) reducing gross greenhouse gas emissions as a priority where practicable, and</p> <p>(b) where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and</p> <p>(c) avoiding any increase in gross greenhouse gas emissions.</p>
S30.062	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	<p>Council opposes Policy CC.14 and seeks its deletion. Issues of concern include:</p> <ul style="list-style-type: none"> • It relies on a definition for "nature-based solution" which lacks the necessary specificity, certainty and clarity required for terms used in a RMA regulatory framework (see Council submission point on this definitions). • It relies on a number of terms that have not been defined. These include "climate-resilient urban area", 	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>"urban greening", "urban cooling", "water sensitive urban design", "resilience". The lack of definitions for these terms creates uncertainty for applicants, councils, and other stakeholders.</p> <ul style="list-style-type: none"> • The policy includes requirements that will not be within the knowledge of the consent authority or applicants, for example suburb-scale tree canopy cover. • The policy would require councils to undertake assessments of tree cover regularly and assess applications against their impact of the current knowledge base, which may be altered by resident action, such as removing trees (either legally or illegally). This would be onerous on both council's and applicants. • The policy duplicates controls under other statutes and regulations such as the Building Code. • Relies on application of tests for which no policy guidance has been provided to determine when these are met. Examples include; "strengthen" in (d), "efficient" in (e), "withstand" in (f). • Clause (f) does not specify the timeline for "predicted" nor whose prediction is to be applied. The clause duplicates the Building Code. • No threshold is included and as drafted would apply to all resource consents, change, variation or review of RMA plans regardless of scale and type of activity. For example, a dormer window breaching a height in relation to boundary standard in a district plan may trigger this policy consideration. As such the policy will have a regulatory reach that has not been justified by the s32 evaluation. • In regard to (a), why are these targets not included in the relevant objective? Further, is there data available to assess this against? • In regard to (c), it is unclear what sort of targets are meant. This needs to be reframed to acknowledge can only address new development. What does "provide for actions and initiatives" mean in a consent process? This needs to be thought through into what this actually means in terms of implementation. How are we supposed to have regard to this? • In regard to (f), this is most appropriately handled under the building act and other acts determining the design resilience of different pieces of infrastructure (such as Electricity (Safety) Regulations 2010) and any amendments needed to capture the resilience of new 	

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				<p>buildings to predicted environmental changes. The Building Act already has requirements for different resilience elements (salt spray, wind zones etc.). These are regularly updated. Similarly there are engineering standards for a wide range of infrastructure to ensure that it is resilient. Assessment of applications may not be the most effective way of implementing resilience in that area. GWRC also need to consider how the canopy cover policy aligns with the restrictions under s76(4A), whereby territorial authorities cannot include rules in their plans that prohibit or restrict the felling, trimming, damaging or removal of a tree or trees on a single urban environment allotment, unless the tree(s) are described in a schedule in the district plan, which includes a description of the tree(s) and the specific street address or legal description. While territorial authorities may be able to include rules requiring canopy cover for new development, they are unable to then prevent the removal of those trees, without complying with the requirements of s76 RMA.</p>	
S30.063	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose	<p>This policy as a whole has less breadth of benefits than either the NPS-REG or the NES- ET. For example, in regard to clause (a), the NPS-REG is much broader than this and includes avoiding, reducing or displacing greenhouse gas emissions.</p> <p>The policy needs to be updated to address the benefits. As it is, it covers more than just the benefits. If it is intended to just address benefits, then it needs to be split into two policies - one for benefits, and the second for recognizing and providing for renewable energy.</p> <p>This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans.</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and amend policy to only apply to resource consents.
S30.064	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and	Support in part	<p>Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions.</p> <p>Clause (d) duplicates (a) and (b).</p>	<p>Amend policy as follows:</p> <p>When considering an application for a regional resource consent, particular regard shall be given to:</p> <p>(a) that water quality, flows and water levels and aquatic habitats of water bodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of waterbodies and the health and wellbeing of freshwater</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		freshwater ecosystems - consideration			<p>ecosystems;</p> <p>(b) that, as a minimum, water quality in the coastal marine area is managed in a way that protects and enhances the health and well-being of waterbodies and the health and wellbeing of marine ecosystems;</p> <p>(c) providing for mana whenua / tangata whenua values, including mahinga kai; (d) maintaining or enhancing the functioning of ecosystems in the water body;</p> <p>(e) maintaining or enhancing the ecological functions of riparian margins;</p> <p>(f) minimising the effect of the proposal on groundwater recharge areas that are connected to surface water bodies;</p> <p>(g) maintaining or enhancing the amenity and recreational values of rivers and lakes, including those with significant values listed in Table 15 of Appendix 1;</p> <p>(h) protecting the significant indigenous ecosystems and habitats with significant indigenous biodiversity values of rivers and lakes, including those listed in Table 16 of Appendix 1;</p> <p>(i) maintaining natural flow regimes required to support aquatic ecosystem health;</p> <p>(j) maintaining or enhancing space for rivers to undertake their natural processes;</p> <p>(k) maintaining fish passage;</p> <p>(l) protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning;</p> <p>(m) restricting stock access to estuaries rivers, lakes and wetlands; and avoiding the removal or destruction of indigenous wetland plants in wetlands.</p>
S30.065	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks	Oppose	The policy represents regulatory overreach and the application of s31 functions to district plan resource consents. These matters are already controlled and managed by the Natural Resources Plan and therefore	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, including limiting to regional consents only.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		and vegetation disturbance - consideration		the policy should be limited to regional consents only. It contains a high level of uncertainty for applicants, councils and other stakeholders. Issues of concern include: <ul style="list-style-type: none"> • The policy applies to all resource consents regardless of scale or activity. It should be restricted to resource consents for earthworks and/or specified vegetation clearance. • It does not provide any guidance or direction as to what environmental outcomes and target attribute states are to be considered. • Discharges to water bodies or onto land where it may enter a waterway are a s30 function, managed under the Natural Resources Plan. • "controlling" indicates a controlled activity status may be appropriate which is inconsistent with (b) where certain discharges are to be avoided and a more restrictive activity status may be required. 	
S30.066	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	These are all matters that are all relevant to a regional council under s30 of the RMA.	Amend policy so that it applies to regional consents only: When considering an application for a regional resource consent the regional council must give effect to Te Mana o te Wai and in doing so must have particular regard to:
S30.067	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	These are all matters that are all relevant to a regional council under s30 of the RMA. A notice of requirement does not involve or give any form of approval for the take or use of water, which require resource consents from the regional council. These are beyond the scope of what can be considered by a requiring authority or a territorial authority through a notice of requirement. This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional plans	Amend policy so that it applies to regional consents only, and not notices of requirement: When considering an application for a regional resource consent, notice of requirement, or a change, variation or review of a regional plan to take and use water, Te Mana o te Wai must be given effect to so that:
S30.068	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for	Oppose	Council opposes this policy and seeks its deletion. These are matters that are addressed in Long Term Plans, Asset Management Plans, and will be considered in the Wellington region Future Development Strategy. Soon,	Delete policy.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		climate change and urban development - consideration		they are likely to fall within the ambit of the Three waters entity. It is unclear how these requirements align with the existing requirements of the NES for Sources of Human Drinking Water	
S30.069	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose	<p>Policy requires some specificity as to what the matter is being addressed through the policy, otherwise would apply as a consideration for any type of consent. Further, this policy would better be articulated as a transitional policy that falls away once Policy EI.1 is given effect to.</p> <p>This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans, as well as the NPS-IB.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives and/or reword policy as follows: When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development that may impact on indigenous biodiversity, particular regard shall be given to enabling mana whenua / tangata whenua to exercise their role as kaitiaki, including, but not restricted to:</p> <ul style="list-style-type: none"> (a) providing for mana whenua / tangata whenua values associated with indigenous biodiversity, including giving local effect to Te Rito o te Harakeke, (b) incorporating the use of mātauranga Māori in the management and monitoring of indigenous biodiversity; and (c) supporting mana whenua / tangata whenua to access and exercise sustainable customary use of indigenous biodiversity, including for mahinga kai and taonga, in accordance with tikanga. <p>Amend policy to include this statement, deeming provision, or advice note: This policy shall cease to have effect once Policy EI.1 is in place in an operative district or regional plan.</p>
S30.070	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards -	Oppose	<p>This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans.</p> <p>Further, this policy would better be articulated as a</p>	<p>Amend policy to only apply to resource consents. Amend policy to include this statement, deeming provision, or advice note: This policy shall cease to have effect once Policy 29 is in place in an operative district or regional plan.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S30.071	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Oppose	<p>transitional policy that falls away once Policy 29 is given effect to.</p> <p>The policy lacks the necessary precision to enable its meaningful implementation and does not align with objectives. Issues of concerns include:</p> <ul style="list-style-type: none"> • The term/concept 'room for the river' needs better policy direction, or otherwise needs to be defined, explained, or deleted. It is currently unclear what this term means or how it should be implemented. • It is unclear why the following undefined terms were used rather than the defined term 'nature-based solution' (noting that Council opposes this definition): non-structural, soft engineering, green infrastructure. • The concept/term 'room for the river' could provide guidance to councils to enable them to make stronger arguments for taking appropriate land around rivers as an esplanade reserve under s.230 RMA. • The term 'sites and areas of significance to Māori' is more consistent with the National Planning Standards. Further, it is unclear what particular regard is to be given to, their protection? • There is no such thing as a 'city plan' under the RMA. • Amendment to (g) suggested so that it links better to the chapeau of the policy. • This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans. • Further, this policy would better be articulated as a transitional policy that falls away once relevant policies are given effect to. 	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives.</p> <p>Amend policy to only apply to resource consents.</p> <p>Amend policy to include this statement, deeming provision, or advice note:</p> <p>This policy shall cease to have effect once Policy [XXX] is in place in an operative district or regional plan.</p>
S30.072	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation, contains unnecessary duplication, and does not align with objectives. Issues of concern include:</p> <ul style="list-style-type: none"> • (a)(ii) repeats policies, an RPS and all its objectives and policies should be read as a whole, unless a specific objective or policy has primacy. There is also a risk in this approach of listing policies that certain policies are omitted. • In regard to (d) this goes beyond the scope of policy 8 of the NPS-UD which only applies to plan changes. Given this matter is also covered in proposed Policy UD.3, it would be better to cross-reference to policy 55 from UD.3. 	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region's urban areas (as at March 2009/August 2022), particular regard shall be given to whether:</p> <p>(a) the urban proposed development is the most appropriate option to achieve Objective 22 contributes to establishing or maintaining the qualities of a well-functioning urban environment, including:</p> <p>(i) the urban development will be well-connected to</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>the existing or planned urban area, particularly if it is located along existing or planned transport corridors;</p> <p>(ii) the location, design and layout of the proposed development shall achieve the objectives and policies of the RPS apply the specific management or protection for values or resources identified by this RPS, including: 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29,2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23,3. Protecting outstanding natural features and landscape values as identified by Policy 25,4. Protecting historic heritage values as identified by Policy 22,5. Integrates Te Mana o Te Wai consistent with Policy 42,6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17.7. Recognises and provides for values of significance to mana whenua / tangata whenua,8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and</p> <p>(b) the urban development is consistent with any the Wellington Region Future Development Strategy, or the regional or local strategic growth and/or development framework or strategy that describes where and how future urban development should will occur in that district or region, should if the Future Development Strategy has not been notified under section 83 of the Local Government Act 2002 be yet to be released; and/or</p> <p>(c) a structure plan has been prepared.; and/or</p> <p>(d) Any The urban development that would provide for significant development capacity, regardless of if the development was out of sequence or unanticipated by</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>growth or development strategies. Explanation Policy 55 gives direction to the matters that must be considered in any proposal that will result in urban development occurring beyond the region's existing urban areas. This includes ensuring that the qualities and characteristics of a well-functioning <i>urban environment</i> are provided for through clause (a), which includes recognising values or resources identified elsewhere in the RPS.</p>
S30.073	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Amend to address minor typographical error.	<p>Amend policy: When considering an application for a resource consent or a change, variation or review of a district plan, in rural areas (as at August 2022), particular regard shall be given to whether: (a) the proposal will result in a loss of productive capability of the rural area, including cumulative impacts that would reduce the potential for food and other primary production and reverse sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals; (b) the proposal will reduce aesthetic and open space values in rural areas between and around settlements; (c) the proposal's location, design or density will minimise demand for non-renewable energy resources; and (d) the proposal is consistent with any Future Development Strategy, or the regional or local strategic growth and/or development framework or strategy that addresses future rural development, should the Future Development Strategy be yet to be released; or (e) in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity.</p>
S30.074	Chapter 4.2: Matters to	Policy 57: Integrating	Oppose	Council opposes proposed amendments to policy 57 and seek they are deleted for the following reasons:	Delete proposed amendments to policy.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	be considered	land use and transportation - consideration		<ul style="list-style-type: none"> • It is unclear how the requirement to 'require land use and transport planning within the Wellington Region is integrated in a way' relates to resource consents or notices of requirement. The regulatory policies will be implemented in district plans through methods such as zoning, district wide provisions and distribution of land use management frameworks. These methods better achieve the objectives of the RPS and higher order planning instruments, such as the NPS-UD. • The policy duplicates the regulatory policies in other chapters of the RPS including Chapter 4.1 and as such represents an unnecessary regulatory burden. • The explanation to the policy states that it is intended for considering proposals that affect land transport outcomes, but the policy is drafted in a way that it extends beyond this. It also contains no thresholds for development types and scale to be considered. For example, would it apply to a dormer window that breaches a height in relation to boundary standard in a district plan. • Clarity or policy direction is needed on what is meant by an 'inclusive transport network'. • It is unrealistic to require resource management plans and consents to minimise private vehicle use. The tools and methods for achieving this, such as congestion charging, lie outside of the resource management system. • References or a map needed to identify the Western Growth Corridor, Eastern Growth Corridor, and Let's Get Wellington Moving Growth Corridor. 	
S30.075	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Oppose	The policy lacks the necessary precision to enable its meaningful implementation. It is unclear how this policy would be applied to many consents, especially brownfield or infill development. For instance, an applicant has no control over the operation of infrastructure, including public transport. This entire policy is more appropriately managed under development agreements and the development contributions policy made under the LGA.	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives.

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S30.076	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Oppose	This policy provides no value beyond s6(e) RMA, in fact "have particular regard" is a lower regulatory bar than "recognise and provide for". The RPS needs to provide direction at a regional level and not repeat requirements in the RMA. The explanation to the policy actually provides a level of regional guidance and direction and should be considered for inclusion within the policy.	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives.
S30.077	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose	<p>Council opposes this policy and seeks is be amended for the following reasons:</p> <ul style="list-style-type: none"> • It is unclear when the policy would apply i.e. what is meant by a change of a district plan for a development. Reference to 'plan changes' would be more consistent with Policy 8 of the RMA. • The location, design and layout of a development is something that is likely to be unknown until the time of subdivision or land use consent. A district plan provides the framework for guiding these factors. • Policy guidance is needed to help determine when a plan change area is considered to be well-connected to the existing or planned urban area. • It is inappropriate and arbitrary to limit zoning options to High density residential or Medium density residential. The most appropriate zoning for an area will be determined by a range of natural and physical factors relevant to a specific location. 	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives; and/or reword as follows:</p> <p>Policy UD.3: Responsive planning to developments plan changes that provide for significant development capacity - consideration</p> <p>When considering a change of a district plan for a an unanticipated or out of sequence development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:</p> <ul style="list-style-type: none"> (a) the location, design and layout of the proposal: (ii) contributes to establishing or maintaining the characteristics and qualities of a well- functioning urban environment identified in Policy 55(a)(ii) and Objective 22, (iii) is well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors, (iv) for housing will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development, (b) the proposal makes a significant contribution to providing significant development capacity meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage identified in monitoring for: <ul style="list-style-type: none"> (i) a variety of housing that meets the regional, district, or local shortages of housing in relation to the particular type, size, or format, (ii) business space or land of a particular size or locational type, or

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					<p>(iii) community, cultural, health, or educational facilities, and</p> <p>(iv) the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and</p> <p>(c) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution:</p> <p>(i) is of high yield relative to either the forecast demand or the identified shortfall,</p> <p>(ii) will be realised in a timely (i.e., rapid) manner,</p> <p>(iii) is likely to be taken up, and</p> <p>(iv) will facilitate a net increase in district-wide up-take in the short to medium term,</p> <p>(d) required development infrastructure can be provided effectively and efficiently for the proposal, and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term.</p>
S30.078	Chapter 4.3: Allocation of responsibilities	Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	Support in part	Wetlands should be added to the exclusions in 61(c) to be consistent with 61(b), the NES-F, the NPS-FM, as well as FW.6(b).	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with national direction:</p> <p>Regional and district plans shall recognise and provide for the responsibilities below, when developing objectives, policies and methods, including rules, to maintain indigenous biodiversity:</p> <p>(a) Wellington Regional Council shall be responsible for developing objectives, policies, and methods in the regional policy statement for the control of the use of land to maintain indigenous biodiversity;</p> <p>(b) Wellington Regional Council shall be responsible for developing objectives, policies, rules and/or methods in regional plans for the control of the use of land to maintain and enhance ecosystems in water bodies and coastal water. This includes land within the coastal marine area, wetlands and the beds of lakes and rivers; and</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					(c) city and district councils shall be responsible for developing objectives, policies, rules and/or methods in district plans for the control of the use of land for the maintenance of indigenous biodiversity. This excludes land within the coastal marine area, wetlands and the beds of lakes and rivers.
S30.079	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Oppose	<p>The policy uses terminology inconsistent with national direction, and duplicates other parts of regulations. For example, territorial authorities are required to give effect to NPS-FM 3.5 (4) so it is unclear why this needs to be repeated in an RPS. The RPS needs to provide clear direction on what is exactly required at a regional level in clause (c), rather than just duplicate what is set out in the NPS-FM. At present, it adds no value.</p> <p>The reference to a 10m setback is less stringent than the 100m setback required under the NES-F.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with national direction: Regional and district plans shall recognise and provide for the responsibilities below, when developing objectives, policies and methods, including rules, to protect and enhance the health and well-being of water bodies and freshwater ecosystems:</p> <p>(a) Wellington Regional Council has primary responsibility for freshwater. Wellington Regional Council shall be responsible for the control of the use and development of land for the purposes of water quality and quantity.</p> <p>(b) In relation to wetlands, Wellington Regional Council is responsible for managing land use within, and within a 10m margin 100m setback of natural wetlands as directed by the NES-F 2020, as well as areas adjoining and/or upstream of a wetland for the purpose of protecting wetlands;</p> <p>(c) city and district councils territorial authorities are responsible for the control of land use and subdivision. City and district councils Territorial authorities must include objectives, policies, and methods in district plans to promote positive effects, and avoid, remedy or, or mitigate adverse effects (including cumulative effects) of land use and subdivision on the health and wellbeing of water bodies, freshwater ecosystems and receiving environments (as required by NPS-FM 3.5 (4))</p> <p>They must carry out their responsibility in regard to the NPS-FM through their functions under Section 31 of the RMA and must not duplicate or replicate objectives, policies, rules or other methods that fall under the functions of Wellington Regional Council in a regional plan.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S30.080	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Oppose	Council oppose this policy and seek its deletion. The RPS should not direct when and how territorial authorities will use their powers under the Local Government Act. These are matters for councils to determine at their discretion and in response to the concerns and issues for their communities. There is no such thing as a city plan under the RMA.	Delete policy, or amend policy so that it provides clear and appropriate direction to plan users in line with objectives.
S30.081	Chapter 4.4: Non-regulatory policies	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Council recognises that iwi/Māori communities are particularly vulnerable to the effects of climate change, including low lying settlements such as Takapuwahia and Hongoeka in Porirua.	Retain as notified.
S30.082	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	The Regional Policy Statement should not direct when and how territorial authorities will use their powers under the Local Government Act or under other statutes such as the management of reserves under the Reserves Act 1977. These are matters for councils to determine at their discretion and in response to the concerns and issues for their communities.	Delete policy or amend so that it applies to the regional council only.
S30.083	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	This would improve the certainty and clarity of the policy.	Amend policy to clarify who is responsible for each of these initiatives.

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S30.084	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	These matters are covered by earlier regulatory and consideration policies, it is unclear how it fits with these or adds more guidance for plan users.	Delete policy, or amend policy so that it provides clear and appropriate direction to plan users in line with objectives.
S30.085	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support in part	These matters align with the Regional Council's functions under s30.	Amend policy to clarify the regional council is responsible for supporting rural communities.
S30.086	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Oppose	This policy does not make sense. It is a non-regulatory policy that requires a regulatory response. It is unclear why the Wellington Regional Council hasn't addressed this through Proposed Change 1, but rather is requiring itself to do this through another change.	Delete policy.
S30.087	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Oppose	This policy does not make sense. It is a non-regulatory policy that requires a regulatory response.	Delete policy, or amend policy so that it provides clear and appropriate direction to plan users in line with objectives.
S30.088	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-	Oppose	This policy does not make sense. It is a non-regulatory policy that requires a regulatory response.	Delete policy, or amend policy so that it provides clear and appropriate direction to plan users in line with objectives.

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		functioning urban environments - non-regulatory			
S30.089	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 4: Consideration - resource consents, notices of requirement and when changing, varying or reviewing plans	Oppose	Amend method to make consequential amendments in line with relief sought to restrict the application of policies to resource consents and notices of requirement	Amend method to make consequential amendments in line with relief sought to restrict the application of policies to resource consents and notices of requirement
S30.090	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 5: Allocation of responsibilities	Oppose	This method does not make sense. It does not allocate responsibilities and is unnecessary.	Delete method.
S30.091	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support in part	This method should be amended to recognise that design guides should be produced where necessary, reflecting that there is already regional and national guidance that can be used. Council's PDP takes an enabling approach to papakāinga development and does not require compliance with design guides.	Amend policy as follows: Prepare where appropriate the following development manuals and design guidance: (a) Urban design guidance to provide for best practice urban design and amenity outcomes in accordance with Policy 67(a); (b) Papakāinga design guidance that are underpinned by Kaupapa which is Māori in partnership with Mana Whenua in accordance with Policy 67(f); and (c) Urban design guidance and development manuals to assist developers in meeting Policy CC.14 and Policy FW.3. Implementation: Wellington Regional Council and city and district councils (via the Wellington Regional Leadership Committee) and in partnership with mana whenua
S30.092	Chapter 4.5: Methods to implement policies	Method IM.1: Integrated management	Support in part	Policy contains grammatical errors and terminology inconsistent with the National Planning Standards.	Amend policy as follows: To achieve integrated management of natural resources, the Wellington Regional Council, district and city councils and

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	(non-regulatory methods)	t - ki uta ki tai			<p>territorial authorities shall:</p> <p>(d) partner with and provide support to mana whenua / tangata whenua to provide for their involvement in resource management and decision making; and</p> <p>(e) partner with and provide support to mana whenua / tangata whenua to provide for mātauranga Māori in natural resource management and decision making; and</p> <p>(f) work together with other agencies to ensure consistent implementation of the objectives, policies and methods of this RPS; and</p> <p>(g) enable connected and holistic approach to resource management that looks beyond organisational or administrative boundaries; and</p> <p>(h) recognise that the impacts of activities extend beyond the immediate and directly adjacent area; and</p> <p>(i) require Māori data, including mātauranga Māori, sites and areas of significance, wāhi tapu and wāhi tūpuna are only shared in accordance with agreed tikanga and kawa Māori; and</p> <p>(j) share data and information (other than in (f) above) across all relevant agencies; and</p> <p>(k) incentivise opportunities and programmes that achieve multiple objectives and benefits.</p> <p>Implementation: Wellington Regional Council* and city and district councils territorial authorities</p>
S30.093	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Oppose	<p>The term "urban development" is not defined nor is there a scale or other threshold to be applied before joint processing is required. As drafted, the method would capture applications that are limited notified.</p> <p>Policy needs to be retitled to tie in to freshwater if this is to be a FW method. Also it is unclear why joint processing would only be appropriate for urban and RSI consents, and not for large-scale rural consents.</p>	<p>Amend method as follows"</p> <p>Method FW.2: Joint processing of urban development resource consents urban development which impact on freshwaterWhen processing resource consents that may impact on freshwater, the Wellington Regional Council, district and city councils territorial authorities shall:</p> <p>(a) jointly process notified resource consents (where both regional and district</p>

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					<p>consents are publicly notified) for urban development and regionally significant infrastructure;</p> <p>(b) encourage resource consent applicants to engage with mana whenua / tangata whenua early in their planning</p> <p>(c) collaborate on pre-application processes;</p> <p>(d) collaborate on the processing of non-notified resource consents;</p> <p>(e) collaborate on monitoring of consent conditions; and</p> <p>(f) exchange information and data to support integrated management.</p> <p>Implementation: Wellington Regional Council, district and city councils territorial authorities</p>
S30.094	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Oppose	<p>Council supports this method being timebound in principle. It has already been given effect to through our PDP. However, Policy EI.1 requires a first principles approach to SNA identification and protection which would make it challenging for any council to meet this.</p> <p>The government has released an exposure draft of the NPS-IB which sets out additional requirements and a longer implementation timeframe. The RPS should align with these if/when the NPS-IB is gazetted.</p> <p>Wording change would increase clarity of method.</p>	<p>Amend method to either:</p> <ul style="list-style-type: none"> • remove 2025 time frame; or • align with NPS-IB timeframes once gazetted; or • provide for councils that have mapped and protected all SNA in their plan to give effect to this policy through their next full district plan review; <p>And /or reword policy as follows:</p> <p>The regional council will liaise with the region's territorial authorities to ensure that all district plans include, by 30 June 2025 at the latest, a schedule of indigenous ecosystems and habitats with significant indigenous biodiversity values and plan provisions to protect them from inappropriate subdivision, use and development. Where a territorial authority has not initiated a district-wide indigenous biodiversity assessment has not been initiated by 30 June 2024, the regional council will liaise with the territorial authority to agree on a programme of works and an understanding as to whether:</p> <p>(a) the territorial authority shall continue to have sole responsibility; or</p> <p>(b) the regional council shall take full responsibility; or</p>

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					(c) the territorial authority and the regional council shall share responsibilities.
S30.095	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support in part	The method as drafted omits the step before managed. Add 'identify' for consistency with Policy 27 of the RPS.	Amend Method 32 (b) to include the 'identify' step for Special Amenity Landscapes as follows: (...) (b) identify and protect outstanding natural features and landscapes, and identify and manage the values of special amenity landscapes, including those with significant cultural values; (...)
S30.096	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support in part	Policy should be time bound to increase clarity and regulatory certainty.	Amend policy so that it is timebound.
S30.097	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support in part	There are other methods which should be added to this method for completeness, rates rebates are just one tool under a wider umbrella of non-regulatory support.	Amend method as follows: Assist landowners to maintain, enhance and/or restore indigenous ecosystems identified by Methods IE.2 and CC.7, including by, but not limited to: (a) assisting with the costs of legally protecting indigenous ecosystems by way of open space covenants with Queen Elizabeth the Second National Trust (QEII); (b) considering opportunities for providing advice, education, support and incentives rates rebates ; (c) assisting with the costs of controlling pest plants and animals; and (d) supporting landowners to restore significant indigenous ecosystems by fencing and planting. Implementation:

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					Wellington Regional Council and city and district councils
S30.098	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Climate change Anticipated environmental results	Oppose	Submission in relation to Table 14. Not all of these anticipated environmental results are specific or measurable. For instance, some use terms like "improving" and "reduced" but do not specify to what extent or from when. Accordingly, it is unclear how the Regional Council would be able to evaluate the efficiency and effectiveness of its RPS in accordance with its s35(2)(b) and (2A) obligations.	Amend Anticipated Environmental results so that they are specific, measurable and timebound.
S30.099	Appendix 3: Definitions	General comments - definitions	Oppose	Clear and concise definitions are critical to assist in interpretation and implementation of the RPS.	Add any further definitions for any terms that are unclear and where a definition would assist in interpretation and implementation, including any relevant terms proposed to be introduced in response to submissions.
S30.0100	Appendix 3: Definitions	Carbon emissions assessment	Oppose	Council opposes this definition and seeks that it be deleted. It lacks the necessary specificity required for a definition to enable effective and efficient implementation in regulatory frameworks (district plans and regional plans). For example, it refers to the carbon footprint but does not: <ul style="list-style-type: none"> • Detail what is meant by a footprint as intended to be used in a regulatory context. • Provide clarity as to what activity the carbon footprint relates to. 	Delete definition, or amend so that it provides clear and appropriate direction to plan users.
S30.0101	Appendix 3: Definitions	Climate change adaptation	Oppose	Council opposes this definition and seeks that it be deleted. It lacks the necessary specificity required for a definition to enable effective and efficient implementation in regulatory frameworks (district plans and regional plans). For example: <ul style="list-style-type: none"> • It is unclear what is meant by "human systems" and how this is to be applied in regulatory frameworks • It refers to "moderate harm" but not to which values, assets and/or other features this is to be applied. • The last sentence reads as a statement more appropriately included in a policy rather than a definition. 	Delete definition, or amend so that it provides clear and appropriate direction to plan users.
S30.0102	Appendix 3: Definitions	Climate change mitigation	Oppose	Council opposes this definition and seeks that it be deleted. It describes actions which are more appropriately included in a policy rather than a definition. It also relies	Delete definition, or amend so that it provides clear and appropriate direction to plan users.

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				on the use of examples to provide clarity missing from the definition. It is also difficult to understand how this definition can be applied in a regulatory RMA framework that manages the development, use and subdivision of land.	
S30.0103	Appendix 3: Definitions	Complex development opportunities	Oppose	Council opposes this definition and seeks that it be deleted: <ul style="list-style-type: none"> • It relies on a committee rather than a statutory plan, Future Development Strategy or other planning instrument for identification of relevant land areas. • It is drafted as a policy rather than a definition and requires a level of assessment and judgement inappropriate for a definition. 	Delete definition, or amend so that it provides clear and appropriate direction to plan users.
S30.0104	Appendix 3: Definitions	High density development	Support	The definition conflates built form, land use activities and spatial areas, and reads as a zone statement. It does not provide a definition of high-density development with a specificity appropriate for use in regulatory frameworks in RMA plans. Council also objects to the definition requiring that high density development must consist of buildings with a minimum of 6 storeys. This exceeds the requirements of the NPS-UD, is not supported by any urban design evidence, and is more appropriately included in a policy.	Delete definition, or amend so that it provides clear and appropriate direction to plan users.
S30.0105	Appendix 3: Definitions	Highly erodible land	Oppose	Council opposes this definition and seeks its deletion for the following reasons: <ul style="list-style-type: none"> • The first sentence requires a level of assessment and judgement inappropriate for a definition. It is unclear what a protective cover of deep-rooted woody vegetation is and how this would be determined. The second sentence is appropriately certain. 	Delete definition, or amend so that it provides clear and appropriate direction to plan users.
S30.0106	Appendix 3: Definitions	Hydrological controls	Support	Council opposes this definition and seeks its deletion for the following reasons: <ul style="list-style-type: none"> • It is drafted as a rule or standard rather than a definition and requires a level of assessment and judgement inappropriate for a definition. • It lacks the necessary specificity required for a definition to enable effective and efficient implementation in a regulatory framework (district plan and regional plan). 	Delete definition, or amend so that it provides clear and appropriate direction to plan users.
S30.0107	Appendix 3: Definitions	Medium density residential development	Oppose	The definition conflates built form, land use activities and spatial areas, and reads as a zone statement. It does not provide a definition of medium density development with a specificity appropriate for use in regulatory frameworks in RMA plans. Council also objects to the definition requiring that medium density development must consist of buildings with a minimum of 3 storeys (noting height is	Delete definition, or amend so that it provides clear and appropriate direction to plan users.

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				actually expressed in terms of maximum height in metres in Schedule 3A(11) rather than the number of storeys). This exceeds the requirements of the MDRS, is not supported by any urban design evidence, and is more appropriately included in a policy.	
S30.0108	Appendix 3: Definitions	Nature-based solutions	Oppose	<p>Council opposes this definition and seeks its deletion for the following reasons:</p> <ul style="list-style-type: none"> • It lacks the necessary specificity required for a definition to enable effective and efficient implementation in a regulatory framework (district plan and regional plan). • The lack of clarity is illustrated by the need to include a wide range of examples. 	Delete definition, or amend so that it provides clear and appropriate direction to plan users.
S30.0109	Appendix 3: Definitions	Permanent forest	Oppose	<p>This definition should draw from and be consistent with the terminology contained in the NES-PF, which in itself regulates plantation forestry. For instance, the definition could be reworded to include plantation forestry as a specific exclusion. It could also include an exclusion of any other harvesting that is not within the NES-PF.</p> <p>Remove "for the purpose of the RPS" from the start of the definition, as this is superfluous when it is a definition in the RPS.</p> <p>There is already a definition for plantation forestry in the NES-PF. To introduce a separate definition to that of the NES-PF would be confusing and potentially lead to inconsistency. Where the term plantation forestry is used in the RPS, it needs to be done so in a manner that is consistent with the NES-PF, which is a higher level RMA document than the RPS.</p>	<p>Amend the definition so that it uses the same terminology as in the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.</p> <p>Remove "for the purpose of the RPS" from the start of the definition, as this is superfluous when it is a definition in the RPS.</p> <p>Delete definition and replace it with the definition from the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017</p>
S30.0110	Appendix 3: Definitions	Regionally significant infrastructure	Support in part	<p>The RPS should use the One Network Framework for roading hierarchy, which Waka Kotahi now requires for all transport planning.</p> <p>Paekakariki Hill Road is also located within Porirua City Council's district. It does not make sense to only include that part of the Paekakariki Hill Road that is located within the Kapiti Coast as a local arterial route, when the road has been reclassified as a secondary collector under the One Network Framework now that Te Aranui o Te Rangihaeata has opened.</p>	Amend definition to use the One Network Framework for roading hierarchy.
S30.0111	Appendix 3: Definitions	Tier 1 territorial authority	Oppose	<p>Council opposes this definition and seeks its deletion and replacement with the definition of Tier 1 territorial authority under s2 of the RMA. The reason is that the RMA is the primary piece of legislation and the definition applies broader than just the NPS- UD.</p>	Delete definition and replace it with the definition under s2 of the RMA

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S30.0112	Appendix 3: Definitions	Travel demand management plan	Oppose	Council opposes this definition and seeks its deletion for the following reasons: It is drafted as a policy and includes actions and thresholds that should be the subject of policy direction.	Delete definition, or amend so that it provides clear and appropriate direction to plan users.
S30.0113	Appendix 3: Definitions	Urban areas	Support in part	Definition wording should align with National Planning Standards.	Amend definition as follows: The region's urban areas include residential zones, commercial, mixed use zones, sport and open space zones , and industrial zones identified in the Wellington
S30.0114	General comments	General comments - overall	Not Stated / Neutral	Poor drafting of provisions and a lack of supporting evaluation makes it difficult to assess what many provisions will mean for Council. RPS provisions, including definitions, are not drafted with sufficient rigour and clarity so that they can efficiently and effectively be implemented in regulatory frameworks, namely district and regional plans. These provisions should not require high levels of interpretation, and there is a risk of inconsistent or incoherent implementation across the region as currently drafted. They must also be drafted using the National Planning Standards so that they can meaningfully be implemented by territorial authorities who have implemented the National Planning Standards within their district plans.	Council considers that the provisions need a major overhaul and redrafting.
S30.0115	General comments	General comments - overall	Support	We have generally been unable to undertake redrafting as part of our submission due to the scale of redrafting required and the limited time available. In some cases, we are unclear as to the policy intent and in those circumstances, we have not been able to request any changes until we fully understand that intent. The exception is Objective 22, Policy 30 and Policy 31 of which we have requested redrafted versions.	We request that GWRC immediately commence a variation to Proposed Change 1, and meaningfully engage and work with the territorial authorities on the redrafting of the provisions. Doing so will avoid litigation through appeals and subsequent plan and consent processes.
S30.0116	General comments	General comments - overall	Support	The real value of regional policy statements is to provide policy direction that either does not exist at a national level or exists at a national level but needs to be articulated at a regional level. Council is concerned about the many provisions in Proposed Change 1 that either duplicate or are inconsistent with matters now comprehensively addressed by national direction. In some instances, they duplicate	Greater alignment with National Direction

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				national direction without giving specific guidance in a Wellington Region context.	
S30.0117	General comments	General comments - overall	Not Stated / Neutral	<p>Council has concerns over jurisdictional issues, particularly in relation to the discharge of contaminants to air, land and water; and the management of fresh waterbodies.</p> <p>We consider that various provisions are ultra vires in terms of our respective functions under sections 30 and 31 of the RMA.</p> <p>Further, territorial authorities do not have the capacity or capability to undertake these functions. Many of the provisions as required would require a transfer of powers from regional councils to territorial authorities.</p>	Query in relation to s30 and s31 functions, RMA, 1991
S30.0118	General comments	General comments - overall	Not Stated / Neutral	<p>Proposed Change 1 introduces new requirements where there is no capacity or capability in terms of what is required. Examples of these include whole of life carbon assessment and the requirement for territorial authorities to assess the potential discharge of contaminants against desired attribute states of water. Not to mention the fact that contaminant limits are yet to be set through a plan change to the Natural Resource Plan.</p> <p>Even if this capacity and capability existed, there is a lack of policy direction on some concepts, for example the offsetting of greenhouse gas emissions.</p>	Significant guidance and implementation support would be needed before some provisions can be implemented.
S30.0119	General comments	General comments - overall	Not Stated / Neutral	<p>Proposed Change 1 will require that all councils in the region undertake significant plan reviews by 30 June 2025 at a time where there are a number of other nationally-driven requirements including:</p> <ul style="list-style-type: none"> • Variations/plan changes to give effect to the recent RMA amendments and the National Policy Statement for Urban Development • Upcoming plan changes that will be required by the National Policy Statement for Indigenous Biodiversity, National Policy Statement for Highly Productive Soils, and the Regional Future Development Strategy; and • Government led reform of the resource management system, three waters reform, and the local government review. <p>For Porirua City Council this will be on top of our existing full District Plan Review which is in the middle of its hearings stage.</p>	Council seeks that more thought be given to how these various overlapping processes align, and the implications of a significant change to regional policy at this time.
S30.0120	General comments	General comments - overall	Not Stated / Neutral	Not stated	In addition to the relief sought as set out in our submission, as outlined above Council considers that the · best course of action would be to withdraw much of Proposed

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					Change 1, or otherwise work with councils on a variation to significantly amend most of its contents.
S30.0121	General comments	General comments - overall	Oppose in part	The drafting of many provisions shows a failure to understand the role of the RPS in an RMA framework, and failure to properly identify a range of tools and levers outside of RMA plans that are needed to deliver the outcomes set out in the objectives. For example, Proposed Change 1 contains some very ambitious objectives, such as a 50% reduction in greenhouse gas emissions from 2019 levels, and net-zero emissions by 2050. However, the policies in the RPS cannot and will not achieve these objectives. For example, there are insufficient levers at a regional/local level to reduce emissions from the existing vehicle fleet to the extent needed to meet these goals. Further, district plans can only address future use, development and subdivision and cannot require change to existing use or development.	The objectives collectively need to be reviewed to ensure they are both achievable and realistic.
S30.0122	General comments	General comments - overall	Not Stated / Neutral	Council considers that there is a lack of an evidence base to support the approach taken to most topics in Proposed Change 1. The Section 32 evaluation report does not adequately assess the approach, nor assess costs and benefits .	Not stated
S30.0123	Chapter 4.2: Matters to be considered	General comments - consideration policies	Oppose	Council opposes all "consideration" policies since they often duplicate or conflict with "regulatory" policies, and represent regulatory overreach without sufficient s32 evaluation or other evidence. We consider that they will create unnecessary regulatory costs due to the way they are drafted. They assume a level of knowledge and expertise on a range of matters generally not available to consent authorities, and in some cases represent a transfer of s31 functions to territorial authorities.	Not stated.

S134 Powerco Limited

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S134 Powerco Limited					
S134.001	Chapter 3: Resource management issues, objectives and summary of	Overarching Objective A	Oppose	Objective A fails to provide for the characteristics and qualities of well functioning urban environments and fails to provide for regionally significant infrastructure. The life supporting capacity of ecosystems is considered to be a stand-alone consideration, rather than a subset of mana whenua values. In addition, the objective establishes Te Ao Māori as the pre-eminent concept for delivering	Amend Objective A to clearly provide for the characteristics and qualities of well-functioning urban environments and to provide for regionally significant infrastructure, as follows: Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (a) is guided by Te Ao Māori and incorporates

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	policies and methods to achieve the objectives in the Regional Policy Statement			<p>integrated management with no guidance on how to achieve it. There are no supporting methods, policies or methods about what integrated management guided by Te Ao Māori is. There is a broader concern that Objective A does not fully reflect the diversity of resource management issues and objectives currently provided for in the operative RPS and presented under the following topic headings:</p> <ul style="list-style-type: none"> • Air quality • Coastal environment, including public access • Energy, infrastructure and waste • Fresh water, including public access • Historic heritage • Indigenous ecosystems • Landscape • Natural hazards • Regional form, design and function • Resource management with tangata whenua • Soils and minerals <p>The objective, therefore, potentially prioritises some issues over others that are not referenced in the wording of Objective A, or the three new overarching resource management issues proposed by Proposed Change 1 and appears to pre-empt upcoming legislative change including gazettal of the NPS-Indigenous Biodiversity. At a minimum, the changes sought should be made.</p>	<p>mātauranga Māori; and (b) recognises ki uta ki tai - the holistic nature and interconnectedness of all parts of the natural environment; and (c) protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and (d) protects and enhances the life-supporting capacity of ecosystems; and (e) recognises the dependence of humans on a healthy natural environment; and (f) recognises the role of both natural and physical resources in providing for the provides for and enhances characteristics and qualities of well-functioning urban environments which are supported by both natural and physical resources, including regionally significant infrastructure; and (g) responds effectively to the current and future pressures of climate change, population growth and development.</p>
S134.002	Chapter 3.1A: Climate change	Objective CC.6	Support in part	<p>It is not only the resilience of communities and the natural environment that need strengthened resilience against the adverse effects of climate change. Infrastructure, including regionally significant infrastructure is particularly vulnerable to climate change effects and represents considerable financial investment that is critical to the resilience of communities. It warrants explicit mention in Objective CC.6.</p>	<p>Amend Objective CC.6 to acknowledge the need for increased resilience of infrastructure, including regionally significant infrastructure, against the adverse effects of climate change. This could be achieved by making the following changes: "Resource management and adaptation planning increase the resilience of communities, infrastructure (including regionally significant infrastructure) and the natural environment to the short, medium, and long-term effects of climate change."</p>
S134.003	Chapter 3.6: Indigenous ecosystems	Objective 16	Oppose	<p>A requirement to enhance and restore, as well as protect, significant indigenous ecosystems and habitats in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. It is more onerous than the direction set in the exposure draft of the NPS Indigenous Biodiversity around the interface between specific infrastructure and indigenous</p>	<p>Amend Objective 16 to recognise that enhancement and restoration of indigenous ecosystems and habitats may not be appropriate in all circumstances. This could be achieved by making changes along the following lines: "Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are</p>

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				<p>biodiversity, which recognises there may be situations in which there are no practicable alternatives to locating in areas of significant indigenous vegetation or significant habitats of indigenous fauna, and effects are to be managed in accordance with an effects management hierarchy. This is particularly in the context that the definition of 'restoration' sets a clear expectation that the condition of the environment should be returned to a former state.</p> <p>In the Operative RPS, Objective 16 provides for the 'maintenance' of indigenous ecosystems and habitats. The proposed shift from 'maintaining' to 'protecting' indigenous ecosystems and habitats creates the potential for the Objective to be interpreted as a proxy avoidance Objective and is opposed.</p> <p>The objective should be amended to reflect the provisions for specific infrastructure in the NPS Indigenous Biodiversity, which is currently anticipated for gazettal in December 2022. At a minimum, the objective should be amended to recognise that enhancement and restoration will not be the only, or the appropriate, response in all situations.</p>	<p>maintained protected and, where appropriate, enhanced, and or restored to a healthy functioning state."</p>
<p>S134.004</p>	<p>Chapter 3.6: Indigenous ecosystems</p>	<p>Objective 16A</p>	<p>Oppose</p>	<p>As per Objective 16, a requirement to enhance and restore, as well as maintain, indigenous ecosystems and habitats in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. It is more onerous than the direction set in the exposure draft of the NPS Indigenous Biodiversity around the interface between specific infrastructure and indigenous biodiversity.</p> <p>Further, it is unclear why specific reference is made in Objective 16A to improved resilience to environmental pressures and Te Rito o te Harakeke in relation to indigenous ecosystems and not in relation to significant indigenous ecosystems, which are addressed in Objective 16. Nor is it clear that improved resilience to environmental pressures will be able to be achieved in relation to all development proposals affecting indigenous ecosystems, for example where maintenance or minor upgrade of existing regionally significant infrastructure is required.</p> <p>The objective should be amended to reflect the provisions</p>	<p>Amend Objective 16A to recognise that enhancement and restoration of indigenous ecosystems and habitats may not be appropriate in all circumstances. This could be achieved by making changes along the following lines:</p> <p>"The region's indigenous ecosystems are maintained and, where appropriate, enhanced, and or restored to a healthy functioning state., improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke."</p>

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				for specific infrastructure in the NPS Indigenous Biodiversity, which is currently anticipated for gazettal in December 2022. At a minimum, the objective should be amended to recognise that enhancement and restoration will not be the only, or the appropriate, response in all situations.	
S134.005	Chapter 3.8: Natural hazards	Objective 20	Oppose	<p>The anticipated environmental results for Objective 20 are identified as being:</p> <ol style="list-style-type: none"> 1. There is no increase in the risk from natural hazards as a result of subdivision, use or development (including mitigation works). 2. Where hazard mitigation and climate change measures are employed, there is a greater number and range of soft engineered measures used, that achieve integrated management and broad environmental outcomes. <p>The Objective focuses on 'natural hazard and climate change mitigation and adaptation activities'. There is significant uncertainty in the definitions of 'climate change mitigation' and 'climate change adaptation' and the types of activities that will fall into these categories. However, they appear unlikely to apply to all subdivision, use or development, in which case the Objective will not achieve the first anticipated environmental result. The wording of existing Objective 20 appears likely to be more effective at achieving the first anticipated environmental result and provides greater certainty of the scope and intent of the objective.</p> <p>The term 'minimise' is considered to be too strong unless it is defined as per the PNRP.</p>	<p>Amend proposed Objective 20 to provide greater certainty as to the scope and intent, as described in the Anticipated Environmental Results for the objective. This could be achieved by retaining the wording of existing Objective 20 as follows, or making changes to the same effect:</p> <p>"Natural hazard and climate change mitigation and adaptation activities minimise the risks from natural hazards. Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events and seek to minimise impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity."</p>
S134.006	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	<p>Objective 22 appropriately recognises the development of infrastructure as key to achieving well-functioning urban environments and the intent is supported. Clause (e), however, is unnecessary as places additional weight on the objectives of the RPS relating to air, land, freshwater, coast and biodiversity, giving them additional weight for urban development proposals over and above other RPS objectives that are not listed.</p>	<p>Retain the intent of Objective 22, but delete clause (e) as follows: "Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning urban environments, which:</p> <p>...(e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and ..."</p>
S134.007	Chapter 3.9: Regional form, design and function	Objective 22B	Support	<p>Objective 22B appropriately recognises the need for strategic planning of development in rural areas and is supported.</p>	<p>Retain as notified.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S134.008	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Nature based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment. Nor is it clear how nature-based solutions could perform the role of 'traditional infrastructure' such as gas and electricity distribution networks.	Amend Policy CC.7 to recognise the nature-based solutions may not be practicable in all situations and will not necessarily be able to perform the role of regionally significant infrastructure. This could be achieved by making changes along the following lines: "District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, where practicable . Explanation: Development and infrastructure planning and design should include nature-based solutions where practicable as standard practice , including green infrastructure, green spaces, and environmentally friendly design elements, to manage issues such as improving water quality and natural hazard protection. Nature-based solutions can assist in perform the roles of traditional infrastructure, while also building resilience to the impacts of climate change and providing benefits for indigenous biodiversity and community well-being."
S134.009	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Oppose	The reference to 'low and zero carbon regionally significant infrastructure' creates a third tier of infrastructure, which potentially undermines the term regionally significant infrastructure and is not supported. Recognition and provision needs to be made for investment in all existing regionally significant infrastructure, including infrastructure that is not low or zero carbon, such as gas distribution network. There will continue to be a role for such infrastructure, including in terms of diversity in energy sources, at least during a transition to low carbon energy provision. The preference for low or zero carbon energy provision in clause (a)(iii) could potentially undermine the ability to maintain the security of supply provided by existing carbon based infrastructure networks and this wording is not supported.	Amend Policy 7 to ensure appropriate recognition and provision for all types of regionally significant infrastructure. This could be achieved by making changes along the following lines: "District and regional plans shall include policies and/or methods that recognise: (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including: (i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to low or zero carbon multi modal travel modes; (ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services; (iii) people have access to energy, and preferably including low or zero carbon energy, so as to meet their

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					needs; and ..."
S134.010	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p>	<p>Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines:</p> <p>"Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of water bodies, including:</p> <p>...(c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</p> <p>...(e) avoiding the loss of river extent and values;</p> <p>...."</p>
S134.011	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>The requirement for a minimum 10% net biodiversity gain or benefit is not clear and is not justified in the section 32 report. This is more onerous than the direction set in the exposure draft of the NPS Indigenous Biodiversity around biodiversity gains or benefits. It is also more onerous than the requirement set by the Proposed Natural Resources Plan (PNRP), which sets an outcome of no net biodiversity loss. In lieu of clear direction being set through a gazetted NPS Indigenous Biodiversity, the RPS should be amended to adopt the approach set by the PNRP.</p>	<p>In lieu of the NPS Indigenous Biodiversity being gazetted, amend Policy 24 to ensure the requirements around offsetting are no more onerous than those set out in the Proposed Natural Resources Plan (PNRP), which sets an outcome of no net biodiversity loss. This could be achieved by making changes as follows or to the same effect:</p> <p>"By 30 June 2025, district and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development.</p> <p>Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall:</p> <p>...</p> <p>(d) require that the outcome sought from the use of biodiversity offsetting is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit. achieves no net biodiversity loss.</p>

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					<p>Explanation Policy 24 applies to provisions in regional and district plans ...Calculating a 10 percent net biodiversity gain (offsetting) or a 10 percent net biodiversity benefit (compensation) employs the same or a similar calculation methodology used to determine 'no net loss or preferably net gain' under a standard offsetting approach. The distinction between 'net gain' and 'net benefit' is to recognise that the outcomes achievable through the use of offsetting and compensation are different..."</p>
S134.012	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	<p>It will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme. For example, under the PNRP, all areas in the coastal marine area and the beds of lakes and rivers are considered high hazard risk areas. Under the Proposed Porirua District Plan, stream corridors and areas in the current coastal hazard inundation and erosion overlays are considered high risk. There is existing development in these areas, which will need to be maintained. Further, provision is made in both plans for certain new activities to occur in these locations. It is inappropriate to prevent any and all further development in high hazard areas. In the case of regionally significant infrastructure networks, there will be a need for infrastructure to cross areas identified as high or extreme hazard, such as stream and river corridors, in order to deliver services to communities on the other side.</p>	<p>Amend Policy 29 to recognise that is will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme, and to ensure appropriate provision is made for regionally significant infrastructure to be maintained and to traverse such locations. This could be achieved by making following changes or to the same effect:</p> <p>"Regional and district plans shall:</p> <ul style="list-style-type: none"> (a) identify areas affected by natural hazards; and (b) use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impact over a 100 year planning horizon; (c) include objectives, policies and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (d) include objectives, policies and rules to avoid new subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme, and to appropriately manage risk to new and existing regionally significant infrastructure and to existing subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.

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					..."
S134.013	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Oppose	There is significant uncertainty in the wording of policy IM.2 and how many of the terms might be interpreted in any given situation. For example, it is unclear how this may be applied in a situation where consent is required for maintenance or upgrade of existing regionally significant infrastructure located in an environmentally or culturally sensitive area. The policy should be deleted on the basis of uncertainty and an inability to apply on a consistent basis	Delete Policy IM.2 in its entirety.
S134.014	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose	<p>Not all regionally significant infrastructure is, itself, able to contribute to a reduction in greenhouse gases. Electricity and gas distribution networks, for example, convey energy from its source and/or another provider, to where it is used, irrespective of the way in which that energy generated. The policy already specifically recognises energy generated from renewable sources. It is unnecessary to create a further distinction between regionally significant infrastructure on the basis that it is able to contribute to a reduction in greenhouse gas emissions. The addition to clause (a) is, therefore, opposed.</p> <p>The wording of the policy explanation as it currently appears in the operative RPS appropriately recognises the benefits of renewable energy and regionally significant infrastructure and its role in enabling communities to provide for their social, economic, cultural and environmental wellbeing. In contrast, the wording proposed through Change 1 focuses on the adverse effects of renewable energy and regionally significant infrastructure and is opposed.</p>	<p>Amend Policy 39 by retaining the wording used in the operative RPS, as follows:</p> <p>"When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:</p> <p>(a) the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions; and</p> <p>...</p> <p>Explanation: Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions. The benefits of energy generated from renewable energy resources include:</p> <p>• Security of and the diversification of our energy sources</p> <p>• Reducing our dependency on imported energy resources - such as oil, natural gas and coal</p> <p>• Reducing greenhouse gas emissions</p> <p>• Contribution to the national renewable energy target</p> <p>The benefits are not only generated by large scale renewable energy projects but also smaller scale, distributed generation projects. The benefits of regionally significant infrastructure include:</p> <p>• People and goods can efficiently and safely move</p>

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					<p>around the region, and to and from • Public health and safety is maintained through the provision of essential services - such as potable water and the collection and transfer of sewage or stormwater • People have access to energy to meet their needs • People have access to telecommunication services Energy generation from renewable energy and regionally significant infrastructure (as defined in Appendix 3) can provide benefits both within and outside the region. Renewable energy generation and regionally significant infrastructure can also have adverse effects on the surrounding environment and community. These competing considerations need to be weighed on a case by case basis to determine what is appropriate in the circumstances. When considering the benefits from renewable energy generation, the contribution towards national goals in the New Zealand Energy Strategy (2007) and the National Energy Efficiency and Conservation Strategy (2007) will also need to be given regard. Potential significant sites for development of Wellington region's marine and wind resources have been identified in reports 'Marine Energy - Development of Marine Energy in New Zealand with particular reference to the Greater Wellington Region Case Study by Power Projects Ltd, June 2008' and 'Wind Energy - Estimation of Wind Speed in the Greater Wellington Region, NIWA, January 2008'. Policy 39(a) shall cease to have effect once policy 9 is given effect in a relevant district or regional plan. Policy 39(b) shall cease to have effect once policy 8 is given effect in a relevant district or regional plan.</p>
S134.015	Chapter 4.2: Matters to	Policy 40: Protecting	Support	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems	Amend Policy 40 to recognise that enhancement of waterbodies and freshwater ecosystems may not be necessary or practicable in

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	be considered	and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration		in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	allcases and that the policy focus is on the quality of fresh water rather thancoastal water. This could be achieved by making changes along the followinglines: "Policy 40: Maintaining Protecting and enhancing the healthand well-being of water bodies and freshwater ecosystems - consideration When considering anapplication for a regional resource consent, particular regard shall be givento: (a) thatwater quality, flows and water levels and aquatic habitats of waterbodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of waterbodies and the health andwellbeing of freshwater ecosystems; (b) that, requiringas a minimum, water quality in the coastal marine area is to be managed in away that protects and enhances the health and well-being of waterbodies and thehealth and wellbeing of marine ecosystems.: ..."
S134.016	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The implications of the proposed policy wording are unclear as the environmental outcomes, target attribute states and suspended sediment limits referred to have not been set. It is uncertain whether those thresholds will be appropriate in the context of short term activities such as construction earthworks, particularly in the context that clause b sets an avoidance approach. For example, dewatering discharges can result in a short term exceedance of suspended sediment thresholds during the first flush, even where best practice is applied to the management of dewatering activities. This is commonly accepted as appropriate, subject to appropriate conditions and management approaches, across the country. Complete avoidance of such discharges is unlikely to be practicable.	Amend Policy 41 by retaining the wording used in theoperative RPS, as follows: "Policy 41: Controlling Minimising the effects of earthworksand vegetation disturbance - consideration When considering an application for a resource consent, particular regard shall be given to controlling earthworks andvegetation disturbance by to minimise: (a) erosion; and (a) (b) considering whether the activity will achieveenvironmental outcomes and target attribute states; silt and sediment runoffinto water, or onto or into land that may enter water, so that healthy aquaticecosystems are sustained; and (b) avoiding discharges to water bodies, and to land whereit may enter a waterbody, where limits for suspended sediment are not met. Explanation An area of overlapping jurisdiction between WellingtonRegional Council and district and city councils is

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					<p>the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on erosion prone land in rural areas and many small scale earthworks in urban areas - such as driveways and retaining walls - can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to minimise erosion and silt and sedimentation effects associated with these activities.</p> <p>Minimisation requires effects to be reduced to the extent reasonably achievable whilst recognising that erosion, siltation and sedimentation effects can not always be completely avoided. This policy provides for consideration of earthworks and vegetation disturbance to minimise erosion and sediment runoff prior to plan controls being adopted by regional and district plans in accordance with policy 15. This policy shall cease to have effect once method 31 is implemented and policy 15 is given effect to in regional and district plans. Policies 15 and 41 are to ensure that Wellington Regional Council and district and city councils integrate the control earthworks and vegetation disturbance in their regional and district plans. Method 31 is for Wellington Regional Council and district and city councils to develop a protocol for earthworks and erosion from vegetation disturbance. The protocol will assist with implementation of policies 15 and 41. Some activities - such as major road construction - are likely to require resource consents from both Wellington regional council and district or city councils, which will work together to control the effects of the activity. Vegetation disturbance includes harvesting plantation forestry"</p>

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S134.017	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Oppose	<p>As with Policy 29, the direction in clause (g) to avoid subdivision, use or development in areas where hazards and risks are assessed as high to extreme is opposed. It will not be possible or necessary to entirely avoid all subdivision, use or development such areas, particularly where maintenance or minor upgrade type work is required to existing activities in these areas, or where regionally significant infrastructure is required to traverse areas of high or extreme risk, such as stream and river corridors, to deliver services to communities on the other side.</p> <p>This is recognised in the PNRP and district plans where provision is made for certain activities to occur in areas where natural hazards and risks are assessed as high to extreme, such as stream corridors and areas in the current coastal hazard inundation and erosion overlays.</p>	<p>Amend Policy 51 to recognise that it will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme, and to ensure appropriate provision is made for regionally significant infrastructure to be maintained and to traverse such locations. This could be achieved by making the following changes or to the same effect:</p> <p>"When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to:</p> <p>...</p> <p>(g) avoiding new subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme, and appropriately managing risk to new and existing regionally significant infrastructure and to existing subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.;</p> <p>..."</p>
S134.018	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Oppose	<p>Interpretation of Policy 58 is that the requirement for new development to be sequenced in a way that ensures the availability of infrastructure prior to development occurring will apply in relation to electricity and gas distribution networks, which fall within the RMA definition of 'infrastructure'. This is supported as infrastructure capacity and security of supply are significant resource management issues. Intensification, urbanisation and population growth continually place demands on energy resources, in particular electricity. While investing considerable resources in forward planning to meet future demand, the layout and delivery of the network is significantly influenced by the scale and pattern of development that results from individual subdivision and development proposals. In some situations, significant infrastructure upgrades may be required to meet the demand for electricity created by new development. The explanation to the policy suggests that the policy will apply just to three waters infrastructure and transport</p>	<p>Amend Policy 58 and the explanatory statement to clarify that the policy applies to all infrastructure needed to support new urban development, not just three waters and transport infrastructure. This could be achieved by making changes along the following lines:</p> <p>"When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, require all new urban development including form, layout, location, and timing is sequenced in a way that:</p> <p>(a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and</p> <p>(b) all infrastructure required to serve new development, including low or zero carbon, multi modal, and public transport infrastructure, energy and telecommunications infrastructure is available, or is consented, designated or programmed to be available prior to development occurring.</p>

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				infrastructure. While case law is clear that it is the objectives and policies of a planning document, rather than explanatory statements, that hold statutory weight, and does not support the wording of the explanatory statement and seeks that it be amended to avoid any suggestion that it may narrow the scope of the policy. For the avoidance of doubt, also seeks to amend the wording of Policy 58 to clearly acknowledge the need to coordinate the provision of energy infrastructure with urban development.	Explanation: Explanation Policy58 requires development to be sequenced such that infrastructure that is necessary to service the development will be provided before the development occurs. This includes both three waters infrastructure, and transport infrastructure, energy and telecommunications infrastructure that would be necessary to support the development."
S134.019	Appendix 3: Definitions	Maintain /maintained /maintenance: (in relation to indigenous biodiversity)	Oppose	Distinct definitions of restoration and enhancement are included and infer improvement of the existing state. It is inappropriate to incorporate these terms in the defined concept of 'maintenance'. If restoration or enhancement are appropriate in relation to development within a certain ecosystem or habitat that should be addressed at a policy level.	Amend the definition of maintain / maintained / maintenance by deleting the reference to restoration and enhancement, as follows: Maintain /maintained /maintenance (in relation to indigenous biodiversity) At least no reduction in the following: (a) the size of populations of indigenous species (b) indigenous species occupancy across their natural range (c) the properties and function of ecosystems and habitats (d) the full range and extent of ecosystems and habitats (e) connectivity between and buffering around, ecosystems (f) the resilience and adaptability of ecosystems. The maintenance of indigenous biodiversity may also require the restoration or enhancement of ecosystems and habitats.
S134.020	Appendix 3: Definitions	Regionally significant infrastructure	Support	The definition of Regionally Significant Infrastructure appropriately recognises the gas and electricity distribution networks and reflects the definition recently agreed through mediation as part of the PNRP.	Retain as notified.

S125 R P Mansell; A J Mansell, & M R Mansell

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S125 R P Mansell; A J Mansell, & M R Mansell					
S125.001	Chapter 3: Resource management issues, objectives and summary of	Overarching Issue 2: Increasing pressure on housing and	Support	Recognises increasing pressure on housing and infrastructure capacity in the Wellington Region. Consistent with the intent and requirements of the NPS-UD.	Retain as notified.

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	policies and methods to achieve the objectives in the Regional Policy Statement	infrastructure capacity			
S125.002	Chapter 3.9: Regional form, design and function	Regional form, design and introductory text	Support	Support well-function urban environments consistent with the NPS-UD. Includes reference to the Western Growth Corridor - Tawa to Levin (included in the Wellington Regional Growth Framework).	Retain as notified.
S125.003	Chapter 3.9: Regional form, design and function	Objective 22	Support	Consistent with the intent and requirements of the NPS-UD.	Retain as notified.
S125.004	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support	Consistent with the intent and requirements of the NPS-UD.	Retain as notified.
S125.005	Chapter 3.9: Regional form, design and function	Objective 22B	Support	Consistent with the intent and requirements of the NPS-UD.	Retain as notified.
S125.006	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support	Objective 22B is to be implemented through Policy FW.7 (Water attenuation and retention - non-regulatory) and Policy 56 (Managing development in rural areas - consideration). The submitters generally support the proposed new Objective 22B and the implementation of this objective through Policy 56, and consider they are consistent with the intent and requirements of the NPS-UD.	The submitters seek the intent of the proposed new Objective 22B and the implementation of this objective through Policy 56 to be retained as currently written.

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S125.007	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Accurately reflect the proposed new wording of clause (b)	Amend the explanation for Policy 55 (second sentence in paragraph two) to read: <i>"To provide for the interim period where the Future Development Strategy is in development, clause (b) also requires consideration to be given to the consistency with any regional strategic growth and/or development framework which is currently the Wellington Regional Growth framework, or any local strategic growth and/or development framework or strategy that describes where or how future urban development should occur in a District."</i>
S125.008	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support	The amendments provide for the interim period where the Future Development Strategy is in development and recognises the tension that exists between urban and rural development on the fringe of urban areas.	Retained as notified.

S64 Rachel Bolstad

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S64 Rachel Bolstad					
S64.001	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support in part	Support all councils ensuring that more homes doesn't mean more emissions. At this time of climate crisis, must keep a clear focus on massively reducing travel emissions by enabling more active transport, public transport, and giving people safe and accessible low-emissions mobility options for their day to day lives.	Request a new Policy CC.2A which requires new subdivisions/developments to have a Travel Demand Management Plan (TDM) and/or additional or different policy tools that ensures developments aren't private car-centric and proves they will not lead to huge growth in private vehicle driving. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S64.002	Chapter 3.1A: Climate change	General comments - climate change	Support	It is important to have clear rationale and understanding for why climate action is needed and how climate inaction harms communities, nature, and has disproportionate impacts for Māori. This section provides a good overview of all the key issues for the Greater Wellington Region	Retain as notified.

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				and for Aotearoa New Zealand more widely in terms of how and why to take action on climate change. This preamble material is essential in providing a rationale for proposed changes.	
S64.003	General comments	General comments - overall	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
S64.005	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Retain, refine and enhance provisions.
S64.006	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support provisions relating to indigenous biodiversity.	Retain, refine and enhance provisions.

S168 Rangitāne O Wairarapa Inc

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S168 Rangitāne O Wairarapa Inc					
S168.001	General comments	General comments - overall	Not Stated / Neutral	Rangitāne o Wairarapa notes that many of the provisions as notified contain inconsistencies in grammatical tense and structure.	In some instances we have suggested wording to rectify this, but we ask that a comprehensive editorial review of the full plan change is undertaken to resolve these errors and inconsistencies.
S168.002	Chapter 3.4: Fresh water (including public access)	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support in part	While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't (i.e when developing, whose statement should be followed and who to engage for further details). As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which, for practical purposes, may be more effective if they were sitting in other parts of the RPS, such as in the policies or methods sections.	We ask that the Council, working with Rangitāne o Wairarapa Inc, amend the RPS to ensure that elements currently included in Objective 12 are fit for purpose, are appropriately located within the RPS, and can be readily interpreted and applied, in order to give effect to the National Policy Statement for Freshwater Management 2020 (NPS FM).
S168.003	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and	We ask that the Council, working with Rangitāne o Wairarapa Inc, amend the RPS to ensure that elements currently included in Objective 12 are fit for purpose, are appropriately located within the RPS, and can be readily interpreted and applied, in order to give effect to the National Policy Statement for Freshwater Management

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				when it shouldn't (i.e when developing, whose statement should be followed and who to engage for further details). As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which, for practical purposes, may be more effective if they were sitting in other parts of the RPS, such as in the policies or methods sections	2020 (NPS FM).
S168.004	Chapter 3.4: Fresh water (including public access)	Objective 12	Not Stated / Neutral	[Decision requested] is consistent with the principles of mana whakahaere and kaitiakitanga in the NPS FM and is required in order to give effect to Te Mana o te Wai. It is also provided for through mechanisms such as s33 of the RMA.	We seek that Objective 12 is amended to provide for tangata whenua / mana whenua to be actively involved by taking a lead role in making and implementing decisions about freshwater.
S168.005	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	In our opinion, replicating or paraphrasing the requirements of the NPS FM, in some cases inaccurately, does not provide any further assistance to plan users looking for guidance on the interpretation of national direction at the regional level. It is also likely to generate inefficiencies in future resource management processes, as those looking to assess their proposals against the relevant freshwater management framework may not have confidence that the RPS gives full effect to the NPS FM. This will result in the need for further assessment of proposals against the NPS FM, with all the inefficiencies that brings, to avoid falling foul of case law on this matter.	[Note - Decision requested concerns implementation of NPS-FM] Rangitāne asks that any provisions in the plan change that are simply a replication or paraphrase of provisions in the NPS FM are amended so that they appropriately give effect to those NPS FM provisions in terms that reflect the regional context.
S168.006	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Rangitāne o Wairarapa strongly object to the statement in the Section 32 report that the Whaitua regions will be identified as Freshwater Management Unit's (FMU's). The Whaitua is not sufficiently fine grained for this purpose and is a form of colonisation that will not combine the management approaches that are vital to restoring our waterways and our whānau, hapū and wider community health.	Rangitāne o Wairarapa ask that the Proposed Plan change include additional provisions which clearly set out the timing and process for co-designing and incorporating FMUs into the RPS, and from there, the inclusion of mana whenua voices (as outlined in recommendation 1 of the Ruamāhanga WIP) in the freshwater visions for each FMU.
S168.007	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Not Stated / Neutral	The Section 32 report states that Change 1 does not fully implement the NPS FM and that Change 1 is focused on 'objectives/visions which the NPS directs to be included in the RPS'.	It is Rangitāne o Wairarapa's view that the plan change goes further than this, and proposes a number of policies which, in title at least, seek to manage land use and development as it impacts on freshwater in 'urban' environments.
S168.008	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	It is Rangitāne o Wairarapa's view that the plan change goes further than this, and proposes a number of policies which, in title at least, seek to manage land use and development as it impacts on freshwater in 'urban' environments. No definition of 'urban development' has been proposed, leaving this term open to interpretation as to what constitutes 'urban development', and what doesn't.	Add a definition of 'urban development' .

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S168.009	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Not Stated / Neutral	Policy 3 of the NPS FM directs that freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, rather than distinguishing 'urban development' from other forms of development. Section 3.5 of the NPS FM directs every regional council to make or change its regional policy statement to the extent needed to provide for 'the integrated management of the effects of use and development of land on freshwater and receiving environments'. Again, Section 3.5 of the NPS FM does not distinguish between the management approaches that should be applied to urban, rural or peri-urban development.	We consider that, in order to give effect to the NPS FM, the proposed policies should provide for a te ao Māori view of how we enact kaitiakitanga (often referred to as 'integrated management' of freshwater) for all development in all areas. Holistic solutions are vital. Compartmentalising solutions have caused a lot of the issues we see today. We also note that the Operative RPS does not distinguish 'rural' from 'urban' development in this way.
S168.010	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Not Stated / Neutral	We are also concerned at Wastewater management within the RPS changes	Any wastewater solutions need to give effect to te Mana o te Wai and holistically be approached as per integrated management. We hope that this issue will be addressed in future plan changes as it hasn't been addressed here (only minor reference to sludge in Policy)
S168.011	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Not Stated / Neutral	Introducing a set of freshwater provisions for urban development only, continues to provide compartmentalised solutions and does not address integrated catchments.	[Note - Submission refers to Part 4 of Schedule 1 of the RMA - FM process] This highlights the need for additional provisions to be added to the RPS in co-design and collaboration with mana whenua (or for the existing provisions to be amended to apply more broadly) to manage all other types of development. However, there is no specified process or timeframe as to when these provisions will be developed and incorporated into the RPS. This will result in a high degree of unnecessary procedural repetition and potential for inconsistencies in approach, as provisions are debated through separate Schedule 1 processes. There is a high risk that dealing with only one element of development in the RPS will create policy loopholes and gaps which will frustrate efficient and effective decision-making.
S168.012	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Not Stated / Neutral	The further degradation of our wai is not an option, and we are concerned that the disjointed policy approach facilitates the continued degradation of our wai. This will also lead to confusion, over complication and non-	Rangitāne o Wairarapa Inc. therefore requests that the Plan Change be amended to include a set of high level but coherent, concise freshwater provisions that applies to all development.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	public access)			compliance. Simple clear policy direction and non segregation is key to informing and educating our community and people to look after the health of our wai.	
S168.013	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Not Stated / Neutral	Rangitāne o Wairarapa considers that Policy FW.6 does not provide sufficient clarity or direction on the division of responsibilities. We also believe that freshwater is not just a regional and/or territorial authority responsibility. The management of freshwater should be led by mana whenua, in collaboration with councils. This is provided for by the NPS FM.	Ultimately, we seek that the regional council transfers the management of freshwater to mana whenua (via a mechanism such as a s33 RMA transfer of functions, powers or duties). This would provide a more holistic and integrated 'whole of catchment' approach to enable us to give effect to te Mana o te Wai.
S168.014	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support in part	Rangitāne o Wairarapa support the intention of the plan change to include provisions which seek to give effect to the Exposure Draft of the National Policy Statement for Indigenous Biodiversity (NPS IB) now, rather than waiting for this policy statement to be formally gazetted.	Retain provisions that seek to give effect to the exposure draft NPSIB.
S168.017	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support in part	Rangitāne o Wairarapa acknowledges the inclusion of biodiversity offsetting and environmental compensation provisions.	Seek amendments to ensure the proposed policies and definitions are consistent with best practice and give full effect to the NPS IB when it becomes operative.
S168.019	Chapter 3.1A: Climate change	General comments - climate change	Support	Climate change comes from a root of colonisation and capitalism. It will impact people and environments differently. Tangata whenua are among the population groups most at risk of the impacts of climate change, which will result in further inequity unless sufficient resources are allocated to enable us to enact our responsibilities as kaitiaki, plan and respond in a way that aligns with our culture, traditions, and unique relationship with the environment. Many sites of significance, marae, wāhi tapu and urupā for example, will be subject to the impacts of both short- and long-term natural hazard trends. Some of our communities have little or no resources to participate in these decision-making processes, nor sufficient reserves to appropriately prepare for the impacts that these issues pose. Our indigenous biodiversity, mahinga kai and taonga species are more vulnerable to environmental change such as increased temperatures and extreme rainfall. Climate change effects will greatly impact indigenous ecosystems and the ability for nature-based solutions to thrive and support communities.	We support the acknowledgement in the Plan Change that climate change will exacerbate existing inequities and threaten the tangible and spiritual components of Māori well-being and seek that these provisions are retained. We support the provisions to partner with tangata whenua to address these matters and seek that the provisions which address these matters are also retained. We seek further clarity around the methods and timeframes to achieve this - which must be bold and ambitious.
S168.020	Chapter 4.5: Methods to implement policies	Method CC.5: Review regional	Support	Rangitāne o Wairarapa are concerned at the urgency at which greenhouse gas emission reductions must be achieved. We seek that the commitment in the section 32 report and Method CC.5 to review the policy package of	We therefore seek that tangata whenua are co-governing, co-managing and co-designing solutions for our future with our communities.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	(non-regulatory methods)	response to reducing agricultural greenhouse gas emissions		provisions in the Plan Change which address climate change and agriculture by 31 December 2024 is upheld, in order to provide for the strongest direction possible to reduce agricultural emissions. 'Hold the line' is an inadequate response to address the climate emergency. We also remind you that indigenous solutions are key and have proven to be massive contributors to reducing and minimising climate change.	
S168.021	Chapter 3.1A: Climate change	General comments - climate change	Not Stated / Neutral		More specific direction is provided within policies and methods to determine how to protect our taiao (indigenous ecosystems), mātauranga māori and nature-based solutions that contribute to hazard mitigation.
S168.022	Chapter 3.1A: Climate change	General comments - climate change	Not Stated / Neutral		Terminology is used consistently throughout the RPS when referring to indigenous ecosystems, biodiversity, indigenous biodiversity and ecosystems, based on clear rationale as to why each term is used in the particular circumstances.
S168.023	Chapter 3.1A: Climate change	General comments - climate change	Not Stated / Neutral		Incentives provided for in the RPS including financial incentives. We want to ensure we tautoko the right behaviours.
S168.024	Chapter 3.1A: Climate change	General comments - climate change	Not Stated / Neutral		Resources and support is provided to tangata whenua to enable whānau, hapū and iwi to participate in co-governance, co-management and co-designing solutions for responding to climate change in a way that best provides for our Ātua, tīpuna, whānau and wider community.
S168.026	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga	Specify the characteristics of well-functioning urban environments relating to the provision of a variety of homes include quality (i.e. healthy), as well as affordability and location.
S168.027	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga	Strengthen policies and methods that provide for the occupation, use, development and ongoing relationship of tangata whenua with their ancestral land
S168.028	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga.	Environmental research explicitly recognises and provides for Mātauranga Māori.

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S168.029	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	The decision requested has potential to improve both tangata whenua and wider community outcomes	Provide further opportunities for tangata whenua to build up with iwi their social, cultural, environmental and economic capacity, using Mātauranga Māori; by implementing a kaupapa Māori-based model or framework for urban development that is outcome focused (such as the Whānau Ora Outcomes Framework).
S168.030	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga.	Policies relating to appropriate urban expansion and development in rural areas are consistent in the issues covered and include a requirement to consider all matters covered in Section 6(e) of the RMA 1991.
S168.031	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Support in part	The current text in paragraph 2 doesn't put the health and wellbeing of water bodies and freshwater ecosystems first and foremost. The language used reflects competing values i.e. "multiple resource users with differing values". Statements such as: "Māori consider fresh water to be a significant taonga (valued resource) that plays a central role in both spiritual and secular realms" implies that Māori tikanga and mātauranga is a religious endeavour. What we do is not religious, this is cultural practice from multiple generations of observing, learning and listening to our taiao. Rangitāne o Wairarapa supports the inclusion of text explaining the expressions of Te Mana o te Wai. However, having now seen the structure of the provision, we have some concerns about how our Te Mana o te Wai statement's will be implemented and incorporated into Objective 12, as explained below.	Amend the introductory text to clarify the hierarchy of obligations in Objective 2.1 of the NPS FM and to remove implications that Māori are acting within a religious realm. Add lack of integrated management of freshwater ecosystems to the list of regionally significant issues.
S168.032	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	The objective as currently drafted repeats what is in the NPS FM but doesn't provide any further guidance as to how to give effect to Te Mana o te Wai in the region. Rangitāne o Wairarapa do not consider it is necessary or particularly helpful to simply repeat the six principles which form part of the fundamental concept of Te Mana o te Wai, as part of the regional expression of the concept.	Remove the six principles of Te Mana o te Wai from the objective, as it is not necessary to repeat these here.
S168.033	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	The notified plan change is the first opportunity that Rangitāne o Wairarapa has had to fully comprehend how our statement of Te Mana o te Wai would be incorporated into the RPS. While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be	Amend the plan change to ensure that the elements of Objective 12 as notified are moved into other provisions of the RPS (such as objectives, policies and methods) which more appropriately reflect the function of those elements.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				applied and when it shouldn't. As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which may be more effective if it was sitting in other parts of the RPS, such as in the policies or methods, or potentially in the Regional Plan.	
S168.034	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	The notified plan change is the first opportunity that Rangitāne o Wairarapa has had to fully comprehend how our statement of Te Mana o te Wai would be incorporated into the RPS. While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't. As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which may be more effective if it was sitting in other parts of the RPS, such as in the policies or methods, or potentially in the Regional Plan.	Rangitāne o Wairarapa seeks an opportunity to work with the Council to determine which elements of the Te Mana o Te Wai statement should be incorporated into Objective 12, and which elements would more appropriately be incorporated in other parts of the RPS or regional plan.
S168.035	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	Rangitāne o Wairarapa are also concerned that there is no direction in this objective to implement mana whakahaere - tangata whenua should have the power and authority to make decisions on governance, management and operational projects for freshwater management, as set out in the NPS FM, and provided for through mechanisms in the RMA such as s33 - transfer of powers. Freshwater is a taonga for our whānau, hapū and iwi.	Amend Objective 12 to provide that tangata whenua are actively involved in freshwater management and will lead decision making on strategy, management and implementation of operational initiatives related to fresh water, in order to give effect to Te Mana o te Wai. Including implementing mana whakahaere as set out in the NPS-FM and provided for through s33 of the RMA.
S168.036	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Oppose in part	Rangitāne o Wairarapa support the intent of this policy, in particular that objectives, policies, rules and or methods will be prepared in partnership with tangata whenua. However, we have several concerns about the provision as currently drafted. The provision essentially paraphrases the NPS, sometimes inaccurately, including in relation to the sequence of steps that must be followed, which is not particularly helpful. The provision also does not provide any additional direction at the regional level. Long term visions must be set out in the RPS. Practically, the FMUs must also be identified in the RPS, rather than the Regional Plan, as the long-term visions relate to the FMUs. There is a sequencing issue with clause b and c.	Amend the policy: So that it is clear that FMUs will be identified in the RPS, and will be identified as a first step, before the development of the long-term visions, and that this will occur before the regional plan is made or modified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S168.037	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Oppose in part	<p>FMUs must be identified before long-term visions can be developed.</p> <p>Rangitāne do not agree that the whitua are appropriate to be defined as FMUs. Long term visions must be set out in the RPS. Practically, the FMUs must also be identified in the RPS, rather than the Regional Plan, as the long-term visions relate to the FMUs. There is a sequencing issue with clause b and c. FMUs must be identified before long-term visions can be developed. Rangitāne do not agree that the whitua are appropriate to be defined as FMUs. Values, land uses, geology, climate influence parts of those whitua differently and the management responses may need to be different in those different areas. Rangitāne o Wairarapa note their position here that it is important that values for each of the FMUs are defined, rather than relying on a broad, generic set of values.</p> <p>In addition, if FMUs are being identified, clause 3.8 of the NPS FM directs that regional councils must also identify, if they are present: monitoring sites, primary contact sites, the location of habitats of threatened species, outstanding water bodies and natural inland wetlands within the FMUs. When will these matters be addressed and incorporated into the RPS? The section 32 report is silent on this.</p>	To correctly reference the sequence of steps in the NOF process in the NPS FM (clause e). The sequence should be to firstly identify attributes, then record the baseline state, and then set target attributes that achieve the environmental outcome and long-term visions. Amend clause (e) so that this order of events is clear and reflects the NPS FM.
S168.038	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>The title of this policy indicates that the provision relates specifically to urban development. However not all elements of the provision are specifically about urban development, and many are relevant to all freshwater decisions, for example see clauses a - e, l - l.</p> <p>If the intention of the policy is that it applies only to urban development, how will these matters be managed for other forms of development? No definition of 'urban development' is provided in the plan change. Restricting the scope of the policy in this way is neither appropriate, efficient or effective, and neither will it give full effect to the NPS FM.</p> <p>If additional provisions will need to be drafted and incorporated into the RPS in the future to address non-urban matters, this will lead to considerable repetition and the likelihood of confusion, inefficiencies, and inconsistencies in approach. A disjointed and confused approach will go against the intended and stated objective of achieving integrated management.</p>	<p>Amend the policy:</p> <p>To improve the grammatical structure, and provide greater clarity and consistency, including in particular clauses a and b;</p> <p>To extend clause (d) to refer to environmental flows, not just target attribute states</p> <p>So that it applies to all use and development, not just 'urban development', in order to efficiently and effectively achieve integrated management.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S168.039	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	Rangitāne o Wairarapa support the content of this provision but, as a whole, the policy doesn't make grammatical sense. One way to improve clarity would be to split the matters into several distinct clauses.	Reword the provision to provide greater clarity and improve the grammatical structure of the policy
S168.040	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	It is unclear why the life supporting capacity of soil is a freshwater matter.	Provide better clarity in the policy on the relationship of the life-supporting capacity of soil to achieving freshwater outcomes.
S168.041	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	<p>While the explanation for this policy states that the policy prioritises health needs of people before other uses of water, the provision doesn't currently do that and is very broadly phrased.</p> <p>Rangitāne o Wairarapa considers that the only water takes that should have second priority under Te Mana o te Wai are water takes for drinking water and sanitation. The taking of water for 'public water supply' or 'community supplies' should be limited to the volume necessary for those purposes, and not for other uses such as irrigation or industrial use.</p> <p>It is also important that the list of health needs for water takes in this policy is an exclusive list, not an inclusive list. As it is currently drafted, other uses will be able to argue that they are 'health needs'.</p> <p>As currently drafted, the focus of this policy is on water 'takes'. Other health needs, in particular the cultural and spiritual health needs of Māori, do not require 'taking' water (for example use of water for baptism or birthing). Instead they require that sufficient water is left in waterbodies and that this water is healthy from a spiritual</p>	<p>Amend the policy: So that the only second priority water takes are for drinking water and sanitation only, and then only as these are needed the health needs of people. Amend so that other uses of a public or community supply fall within the third priority, for water takes (in accordance with Te Mana o te Wai). Clarify the list of second priority water takes ("health needs of people") so this is an exclusive list, not an inclusive one. Make provision for the cultural and spiritual health needs of tangata whenua, which require that sufficient water remains within waterbodies that is spiritually and culturally healthy.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				and cultural perspective. These health needs are currently missing from the policy and should be included.	
S168.042	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	The taking of water for marae as a health need is supported.	Retain the taking of water for marae as a health need.
S168.043	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The provision as currently worded does not reflect the wording in the NPS FM, which refers to the health and wellbeing of water bodies and freshwater ecosystems. If the policy is exclusively about ecological matters, then the correct terminology is 'ecosystem health' - see Appendix 1A - Compulsory values. It is not clear whether the policy is concentrated on ecosystem health, or is trying to give effect to the full extent of matters addressed in the NPS FM. If it is the latter, the policy needs to go further if it is intended to give effect to the NPS FM.	Amend the policy to: Improve the clarity and better link the subclauses to the main clause of the policy, Reflect that both land and freshwater will need to be managed to give effect to Te Mana o te Wai; Substitute 'ecological health of waterbodies' with the phrase used in the NPS FM, which is 'ecosystem health'; Incorporate the broader concept of "wellbeing" which appears to be missing from this provision and should be included, if the intent of this provision is to give effect to the NPS FM; Reflect the structure of the NPS FM - Te Mana o te Wai should sit in the main clause of the policy as this is the overarching purpose and a holistic concept, ecosystem health is just one component of Te Mana o te Wai, and cannot be considered in isolation of the other components;
S168.044	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	'Promotion' of various actions will not go far enough to achieve the necessary environmental outcomes. Rangitāne o Wairarapa consider that a level of protection will also be needed.	Substitute the word 'promoting' with text which reflects the need to 'protect to the extent necessary to achieve the environmental outcomes', as 'promoting' is insufficient.
S168.045	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of	Support in part	'Measuring' water takes will not go far enough to achieve TMOTW, these water takes will need to be 'managed' to ensure environmental flows and levels are achieved.	Include provision for managing water takes, not just measuring and evaluating them, to ensure that environmental flows and levels are achieved.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		water bodies - regional plans			
S168.046	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The explanatory text for this policy does not appear to refer to the appropriate clauses when describing habitat diversity or activities which impact on habitat diversity. In addition, it is inconsistent with the NPS FM. See Appendix 1A - Compulsory Values in the NPS FM, which describes the five biophysical components of freshwater ecosystem health, and which directs that all five of these components must be managed. Habitat is just one component of freshwater ecosystem health.	Amend the explanatory text to: Refer to 'Ecosystem health' and the five biophysical components of freshwater ecosystem health that must be managed; Substitute 'freshwater ecosystems' for 'aquatic ecosystems'; Remove reference to specific clauses in the policy, as these appear not to capture all activities and also risks inappropriately elevating some activities or aspects above others.
S168.047	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Several of the clauses in the policy simply repeat some of the NPS FM policies, which doesn't provide any additional assistance in how these national policies are to be applied at the regional level	Provide direction on how these national policies are to be applied at the regional level.
S168.048	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Rangitāne o Wairarapa support the intent of the policy but consider this should be strengthened. Having 'particular regard' to these matters will not be sufficient to achieve the objectives or give effect to Te Mana o te Wai. These things must be achieved. This policy should be setting up a framework to ensure that things don't get worse, not a framework to which 'regard' should be had. In particular, the policy needs to address the situation where target attribute states haven't yet been set; and set a 'maintain' or 'hold the line' framework.	Amend the policy to: Reword the opening clause of the policy along the lines of the wording used in Policy 42, which states "When considering an application...the regional council must give effect to Te Mana o te Wai and in doing so, must have particular regard to."; Minimise effects of the proposal on groundwater recharge areas... in accordance with environmental flows and levels (clause f) Maintain "ecologically relevant" flows to provide for the health and wellbeing of the water body and freshwater ecosystems, as 'natural flow regimes' can't be maintained if water takes are provided for (clause i); Maintain "or enhance" fish passage (clause k),
S168.049	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and	Support in part	The policy needs to address the full range of matters in the NPS FM in relation to natural wetlands until such time as the regional plan is amended in accordance with clause 3.22 of the NPS FM.	Address additional matters in the NPS FM which relate to wetlands - to promote the restoration of natural inland wetlands, and the protection of their values, in particular the values of ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values and amenity value.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		freshwater ecosystems - consideration			
S168.050	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	Rangitāne o Wairarapa consider that this policy should be setting up a 'make sure it doesn't get worse' framework, not a 'regard to' one. In particular the policy should address the situation where target attribute states haven't been set yet; and set a 'maintain' framework. Clause (b) confuses 'limits', which are rules, with 'target attribute states', which are the water quality standards.	Amend the policy to: Reword the opening clause of the policy along the lines of the wording used in Policy 42, which states "When considering an application...the regional council must give effect to Te Mana o te Wai and in doing so, must have particular regard to."; Maintain current water quality, until environmental outcomes and target attribute states are in place; Reword clause b so that it refers to target attribute states;
S168.051	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	The explanatory text refers to the intention of the policy being to 'minimise' effects. This does not accurately reflect the direction of the NPS FM, which is to manage to limits and target attribute states.	Delete the word 'minimise' from the explanatory text and refer instead to the need to manage activities to achieve limits and target attribute states.
S168.052	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	As currently worded, this policy applies much more broadly than to just urban development. If that is all it is intended to cover, then some of the matters may need narrowing. However, confining the scope of this policy in this manner would not be an approach that Rangitāne o Wairarapa would support. Restricting the scope of the policy in this way is neither appropriate, efficient or effective, and neither will it give full effect to the NPS FM.	Amend the policy: So that a consistent grammatical tense is used throughout the policy; So that urban development achieves the target attribute states and environmental flows set for the catchment (clause f and g), not just activity limits; So that it applies to all development, not just 'urban development' (which is undefined by the plan change), in order to efficiently and effectively achieve integrated management.
S168.053	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Restricting the scope of the policy in this way is neither appropriate, efficient or effective, and neither will it give full effect to the NPS FM.	Amend the policy: So that a consistent grammatical tense is used throughout the policy.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S168.054	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	Rangitāne o Wairarapa support the conservation and efficient use of water and energy. However, this policy is not strong enough in directing the efficient use of water. Policy 11 of the NPS FM is worded in a directive way so as to 'require' efficient use, it is not sufficient to 'support' or 'encourage' efficient use of water	Amend the policy and its explanatory text: So that it is consistent with the directive language of Policy 11 of the NPS FM in relation to the efficient use of freshwater.
S168.055	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support in part	There is an inconsistency in the language used in this policy (and in FW.2) and Policy 17 with respect to the public water supply. This needs addressing as it is confusing as to what water users the policy applies to. Other ways to reduce water demand include recycling or reusing water.	Amend the policy to: 'Eliminate' leaks, not 'address' them (clause a) Require efficient use of water for all users, not just new developments; Require' alternative water supplies, not 'address' them (clause c); Adopt consistent language with other provisions with respect to water users; Correct the grammatical tense in the opening clause ('for' not 'of'); Insert additional policy clauses addressing water recycling, and address these matters; and water conservation, in the explanatory text.
S168.056	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	There is an inconsistency in the language used in this policy (and in FW.1) and Policy 17 with respect to the public water supply. This needs addressing as it is confusing as to what water users the policy applies to. Policy 11 of the NPS FM is worded in such a way as to 'require' efficient use by all users, not just new developments.	Amend the policy to: Adopt consistent language with other provisions with respect to water users; Require efficient use of water for all users, not just new developments (clause a); 'Require' alternative water supplies, not 'address' them (clause c); Adopt consistent language with other provisions with respect to water users; Correct the grammatical tense in the opening clause ('for' not 'of').
S168.057	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Rangitāne o Wairarapa notes that this policy is currently so broadly worded that it applies to all development, not just urban development (except as confined by the policy title). While this does not appear to be the intent, a broader application would be supported by Rangitāne o Wairarapa, as this would more efficient and effective, and more likely to give full effect to the NPS FM. As currently worded, the policy is not strong enough to give effect to the NPS FM in that it only requires 'consideration' of certain matters.	To improve the grammatical structure of clause (k) [Note submission may be referencing Clause (i)], for example as follows: 'Require that Water Sensitive Urban Design principles and methods are applied during consideration of subdivision, the extent of impervious surfaces and in the control of stormwater infrastructure and the extent of impervious surfaces; To remove the word 'consider' from clauses i and j and use

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				Rangitāne o Wairarapa supports a partnership approach with mana whenua /tangata whenua.	wording that gives effect to the NPS FM; So that it applies to all development, not just 'urban development' (which is undefined by the plan change), in order to efficiently and effectively achieve integrated management.
S168.058	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support in part	Rangitāne o Wairarapa support seeking financial contributions for stormwater networks, where onsite treatment cannot be achieved. Our preference, however, is that wherever possible, Stormwater Management Plans should be required to be developed and implemented to ensure adverse effects on the environment, including any cumulative effects, are prevented, or minimised by onsite measures, rather than passing on this responsibility to others. Stormwater Management Plans should give effect to Te Mana o te Wai and prioritise the health and wellbeing of the wai first and foremost, rather than social or economic gain.	Amend the policy title to remove the word 'urban' . Amend the explanatory text to note the need for any Stormwater Management Plan to give effect to Te Mana o te Wai, which means that on-site solutions should be implemented wherever feasible, and that financial contributions for offsite solutions are only to be taken where this cannot be achieved.
S168.059	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	In relation to clause b, we note that the Regional Council controls activities within 100m of wetlands for some activities under the NES-F. Clause c does not provide any assistance. It is our position that this needs to explicitly state that the district and city councils' control everything else which is not controlled by the regional council. It is also not clear whether this policy contradicts Policy FW3. Note also our aspirations that ultimately, tangata whenua would have responsibility for managing freshwater, as explained in the general submission points above.	Amend the policy: So that it accurately reflects the regional councils' responsibilities under the NES-F in relation to wetlands; To explicitly state that district and city councils' control everything else which is not controlled by the regional council.
S168.060	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Rangitāne o Wairarapa consider this policy needs amending so that it is clear who the policy is directed at. It should also be made clearer as to what flood management methods are considered nature-based solutions, as built or engineered flood management solutions would not fit within this definition.	Amend the policy: So that it is clearer who this policy is directed at; To be clearer as to what types of flood management are considered 'nature based solutions'.
S168.061	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging	Support	Rangitāne o Wairarapa support this method.	Retain as notified.

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		with stakeholders , landowners and the community in the identification and protection of significant values			
S168.062	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support in part	Rangitāne o Wairarapa support this method.	Reword clause f and g so that they fit grammatically with the opening clause.
S168.063	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 48: Water allocation policy review	Oppose in part	Rangitāne o Wairarapa do not support the 'first in first served' allocation method, as this has resulted in widespread degradation of our wai and an inability of our whānau, hapū and iwi to exercise tino rangatiratanga. We consider this method should be rejected outright, and that other alternatives should be explored. The method is not sufficiently clear as to what might constitute 'equitable allocation'.	Amend the provision: So that it is grammatically correct and consistent, as currently not all clauses flow appropriately from the introduction. To reference alternative allocation principles as alternatives to the 'first in first served' allocation method; So that the 'first in first served' allocation method is rejected outright; To clarify what is meant by 'equitable allocation' in this context.
S168.064	Chapter 4.5: Methods to implement policies (regulatory methods)	Method FW.1: Freshwater Action Plans	Support in part	Rangitāne o Wairarapa support this method.	Amend the method so that the second to last and last sentences do not contradict each other.
S168.065	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Support	Rangitāne o Wairarapa support this method, in particular early engagement with tangata whenua.	Retain as notified.
S168.066	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems introductory text	Support	Rangitāne o Wairarapa supports the changes to recognise the separate roles of mana whenua/tangata whenua and landowners. However, Rangitāne o Wairarapa wishes to amend the	Amend the sentence ("The area of indigenous ecosystems has been in decline since humans first settled in our region") to highlight that the decline of indigenous biodiversity is a settler impact. The first humans of this land were tangata whenua and we are not

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				wording in the introduction to more accurately acknowledge the history and issues of our region.	settlers.
S168.067	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support in part	The integration of the concept of Te Rito o Te Harekeke through the plan change is supported, however Rangitāne o Wairarapa would like to note that they consider the whakatauki in the Exposure Draft NPS IB is inappropriate for describing this concept in their rohe. Rangitāne o Wairarapa request that a regional and local expression of Te Rito o te Harekeke is developed and codesigned with tangata whenua, and in consultation with the wider community, to give effect to clause 3.2 of the Exposure Draft NPS IB (once gazetted).	Include a policy, or method, or both, providing for the development of a regional and local expression of Te Rito o Te Harekeke, to be codesigned with tangata whenua and incorporated into the RPS by no later than 2024.
S168.068	Chapter 3.6: Indigenous ecosystems	Objective 16	Support	Rangitāne o Wairarapa support this policy and the proposed changes with respect to protection and enhancement of indigenous biodiversity.	Retain as notified
S168.069	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support	Rangitāne o Wairarapa support the acknowledgment of the special relationship of mana whenua/tangata whenua with indigenous ecosystem health and wellbeing in this policy	Retain as notified
S168.070	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support	Rangitāne o Wairarapa support giving effect to Te Rito o te Harekeke, noting the above comments which seek the incorporation of a local expression of this concept.	Retain as notified
S168.071	Chapter 3.6: Indigenous ecosystems	Objective 16C	Support	Rangitāne o Wairarapa support the acknowledgment of the role of landowners, as well as the separation of Objectives 16B and 16C, to ensure that the special relationship that mana whenua/tangata whenua have with indigenous ecosystem health is recognised.	Retain as notified
S168.072	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	Rangitāne o Wairarapa support the inclusion of a deadline for completion of indigenous biodiversity identification.	Retain as notified
S168.073	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats	Oppose in part	The intention of the amendments to Policy 24 is supported, including the addition of a timeframe. However, Rangitāne o Wairarapa considers that amendments are required to ensure that the policy achieves its intent and provides clear outcomes.	Accurately reflect the role of offsetting and compensation as provided for by the Exposure Draft of the NPS IB; Be consistent with and give effect to the NPS IB (on the presumption this is expected to be gazetted before the plan change hearings commence, and on the basis the wording of the NPS is

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		with significant indigenous biodiversity values - district and regional plans		<p>The use of the term 'enable' is inappropriate in this context. Biodiversity Offsetting and Biodiversity Compensation are measures to be considered once all other management measures have been explored and discounted. The wording should accurately reflect the role of offsetting and compensation.</p> <p>The wording of the policy does not accurately reflect the intention of the Exposure Draft of the NPS IB, particularly with regard to the limits to offsetting and compensation. It is not helpful to paraphrase the Exposure Draft NPS IB policy where no additional local context is provided.</p>	unlikely to change), particularly with respect to the limits to offsetting and compensation,
S168.074	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	Clause (c) in particular, does not make grammatical sense and it is therefore difficult to understand how it will achieve the intended outcomes.	Amend clause c so that it makes grammatical sense,
S168.075	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	There are additional principles to offsetting and compensation provided in the NPS IB, the offsetting principles are particularly important. A reference to these principles and the NPS IB in the supporting text would be helpful in highlighting this.	Ensure the policy wording and proposed definitions adopt a consistent approach with respect to the 10% net gain for offsetting and 10% net benefit for compensation.
S168.076	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with	Not Stated / Neutral		The inclusion of known ecosystems and species that meet the limiting criteria in Appendix 1A is supported for clarity, acknowledging that this list is not necessarily limiting and additional ecosystems or species may be included.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		significant indigenous biodiversity values - district and regional plans			
S168.077	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support	Rangitāne o Wairarapa support acknowledgement of the limits to offsetting, noting Rangitāne o Wairarapa's outstanding concerns with Policy 24.	Retain as notified
S168.078	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	This policy is supported, specifically the acknowledgement of the requirement to partner with mana whenua/tangata whenua. The explanation of this policy should also acknowledge partnership with tangata whenua.	Retain policy as notified but amend the explanation as follows: Explanation Policy IE.1 directs regional and district plans to partner with mana whenua/tangata whenua to recognise and provide for Māori values for indigenous biodiversity, and for the role of mana whenua as kaitiaki in the region.
S168.079	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support	Rangitāne o Wairarapa support giving effect to mana whenua/tangata whenua roles in managing indigenous biodiversity.	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S168.080	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	Rangitāne o Wairarapa support the intention of this policy, however, further amendments are sought in relation to the following: The timeframe to ensure identification and prioritisation is completed in a timely manner, rather than 'as soon as practicable'; The process surrounding prioritisation of ecosystems and habitats in subclause (b) should include partnership with iwi to ensure matauranga and taonga species are included and considered in the prioritisation process.	Amend the policy to provide for partnering with iwi in the prioritisation of indigenous ecosystems and habitats process. Alternatively, include an additional policy that recognises and provides for the role of mana whenua/tangata whenua in the identification of priority ecosystems, habitats and species for management and restoration. Include a timeframe (no later than 2024) in the policy to ensure identification and prioritisation is completed in a timely manner, rather than 'as soon as practicable'.
S168.081	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support in part	Rangitāne o Wairarapa acknowledge the role of landowners in the protection, enhancement and restoration of indigenous biodiversity, however the special relationship tangata whenua have with indigenous biodiversity must also be recognised and acknowledged in the identification and prioritisation process.	Amend policy IE.3 to include partnership with iwi in the prioritisation process and include a reference in the explanatory text to policy IE.4 which explains the special relationship of tangata whenua in this process. Alternatively , include an additional policy that recognises and provides for the role of tangata whenua in the identification of priority ecosystems, habitats and species for management and restoration.
S168.082	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support	Rangitāne o Wairarapa support this appendix, noting the above comments on Policy 24. The inclusion of ecosystem and species names for clarity is supported, acknowledging that this does not preclude additional species or ecosystems being considered.	Retain as notified
S168.083	Appendix 3: Definitions	Biodiversity offsetting	Support in part	Rangitāne o Wairarapa generally support the biodiversity offsetting definition as it is consistent with New Zealand guidance. However, an amendment is required to ensure it aligns with the 10% net gain goal specified in Policy 24 and Appendix 1A.	Amend the definition to be consistent with the 10% net gain goal specified in Policy 24 and Appendix 1A.
S168.084	Appendix 3: Definitions	Biodiversity compensation	Support in part	Rangitāne o Wairarapa support the inclusion of a definition of biodiversity compensation. However, amendments are requested to clarify the purpose and use of biodiversity compensation. The definition must be clear that compensation is the riskiest management approach and comes after all measures to avoid, minimise, remedy or offset have been	Amend the definition as follows: A measurable positive environmental outcome resulting from actions that are designed to compensate for residual adverse biodiversity effects that cannot be otherwise managed avoided, minimised, remediated or offset.

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				explored. Compensation is also not necessarily a measurable outcome.	
S168.085	Appendix 3: Definitions	Ecological connectivity	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.086	Appendix 3: Definitions	Ecological integrity	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.087	Appendix 3: Definitions	Ecosystem health	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.088	Appendix 3: Definitions	Enhancement (in relation to indigenous biodiversity)	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.089	Appendix 3: Definitions	Maintain /maintained /maintenance: (in relation to indigenous biodiversity)	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.090	Appendix 3: Definitions	Nature-based solutions	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.091	Appendix 3: Definitions	Naturally uncommon ecosystems	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.092	Appendix 3: Definitions	Protect (in relation to indigenous biodiversity)	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.093	Appendix 3: Definitions	Resilience (in relation to a natural ecosystem)	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.094	Appendix 3: Definitions	Restoration	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.095	Appendix 3: Definitions	Te Rito o te Harekeke	Support	The definition of Te Rito o te Harekeke is supported, noting that a process is requested to develop a local expression of Te Rito o Te Harekeke.	Retain as notified.
S168.096	Appendix 3: Definitions	Threatened ecosystems or species	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.

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S168.097	Appendix 3: Definitions	Tree canopy cover	Support	Rangitāne o Wairarapa supports the inclusion of this definition and the clarification it provides.	Retain as notified.
S168.098	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Rangitāne o Wairarapa supports the amendments to Method 21.	Retain as notified.
S168.099	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support	Rangitāne o Wairarapa support this method, particularly the partnership directive.	Retain as notified.
S168.0100	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	Support	Rangitāne o Wairarapa supports the amendments to this method.	Retain as notified.
S168.0101	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Support	Rangitāne o Wairarapa support the inclusion of this method and the integration of partnership.	Retain as notified.

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S168.0102	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.3: Regional biodiversity strategy	Support	Rangitāne o Wairarapa supports this method.	Retain as notified.
S168.0103	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.4: Kaitiaki indigenous biodiversity monitoring	Support	Rangitāne o Wairarapa supports this method, particularly the partnership directive.	Retain as notified.
S168.0104	Chapter 3.1A: Climate change	Climate change introductory text	Support	Rangitāne o Wairarapa support the acknowledgement that climate change threatens significant sites for Māori and that climate change will have an unequitable impact on Māori.	Retain as notified.
S168.0105	Chapter 3.1A: Climate change	Objective CC.1	Support in part	Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it has to be a no-cost solution).	Amend CC.1 so that it includes a clause that reflects the wording of s5 RMA in terms of enabling people and communities to provide for their social, economic and cultural wellbeing,
S168.0106	Chapter 3.1A: Climate change	Objective CC.2	Support in part		Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it has to be a no-cost solution).
S168.0107	Chapter 3.1A: Climate change	Objective CC.3	Support in part		Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it has to be a no-cost solution).
S168.0108	Chapter 3.1A: Climate change	Objective CC.4	Support in part		Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
					has to be a no-cost solution).
S168.0109	Chapter 3.1A: Climate change	Objective CC.5	Support in part		Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it has to be a no-cost solution).
S168.0110	Chapter 3.1A: Climate change	Objective CC.6	Support		Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it has to be a no-cost solution).
S168.0111	Chapter 3.1A: Climate change	Objective CC.7	Support in part		Rangitāne o Wairarapa strongly support any measures to require a reduction in greenhouse emissions through the RPS, land use and transport planning, where these measures are equitable and enable people and communities to provide for their social, economic, cultural, wellbeing (noting that achieving this does not mean that it has to be a no-cost solution).
S168.0112	Chapter 3.1A: Climate change	Objective CC.4	Support	Rangitāne o Wairarapa strongly support Objective CC.4 to ensure that nature-based solutions are an integral part of climate change responses.	Retain as notified.
S168.0113	Chapter 3.1A: Climate change	Objective CC.5	Support in part	Rangitāne o Wairarapa strongly support the objective to increase the area of permanent forest in the Wellington region; but consider that the objective should be targeted at indigenous forest. Increasing the area of permanent indigenous forest will also have benefits for cultural wellbeing, which should be acknowledged.	Amend the objective so that it is focused on indigenous forest and insert a reference to cultural wellbeing.
S168.0114	Chapter 3.1A: Climate change	Objective CC.8	Support in part	Rangitāne o Wairarapa seek to extend the scope of iwi and hapū decision making to include significant cultural sites and taonga species, to increase their resilience to the effects of climate change.	Amend the objective to include significant cultural sites and taonga species.
S168.0115	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	Rangitāne o Wairarapa support the requirement to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold. Trigger threshold will need to be carefully considered to ensure the effectiveness of the policy in reducing GHG emissions and guidelines comprehensive to ensure a	Retain as notified.

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				wide range of options are considered in travel demand management plans to maximise up-take zero and low carbon transport modes.	
S168.0116	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.3: Travel demand management plans	Support	Rangitāne o Wairarapa support the requirement to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold. Trigger threshold will need to be carefully considered to ensure the effectiveness of the policy in reducing GHG emissions and guidelines comprehensive to ensure a wide range of options are considered in travel demand management plans to maximise up-take zero and low carbon transport modes.	Retain as notified.
S168.0117	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	Rangitāne o Wairarapa support the enabling of infrastructure that supports the uptake of zero and low carbon multi-modal transport, that contributes to reducing GHG emissions through district plans. Requiring consideration of transport demand optimisation, and maximising transport mode shift away from private vehicles in planning decisions is also supported.	Retain as notified.
S168.0118	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Rangitāne o Wairarapa support the enabling of infrastructure that supports the uptake of zero and low carbon multi-modal transport, that contributes to reducing GHG emissions through district plans. Requiring consideration of transport demand optimisation, and maximising transport mode shift away from private vehicles in planning decisions is also supported.	Retain as notified.
S168.0119	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	In principle, Rangitāne o Wairarapa strongly support any measures to require a reduction in agricultural emissions, rather than simply avoiding increased emissions from this sector.	Rangitāne o Wairarapa seek that the Regional Council uses any means available to them, including through the RPS if government policy and legislation allows, to require a reduction in agricultural greenhouse gas emissions.
S168.0120	Chapter 4.5: Methods to implement	Method CC.5: Review	Support in part	Support the commitment in Method CC.5 but seek this is strengthened to make reference to notifying a plan change, if the review finds that changes to the provisions	Amend Method CC.5 to state that a plan change to the RPS and Regional Plan will be notified where changes are required to the provisions. Retain method CC.5 to review this provision and

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	policies (non-regulatory methods)	regional response to reducing agricultural greenhouse gas emissions		in the RPS and Regional Plan are required. support the commitment in the s32 Report (i.e. Method CC.5): "The proposed package includes provisions to review the regional policy approach by 31 December 2024 (the date for notification of a full RPS review) to respond to any predicted changes in greenhouse gas emissions from the agricultural sector in the region and any new national direction" (pg 135).	subsequently to notify a plan change if necessary, by 31 December 2024.
S168.0121	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	Rangitāne o Wairarapa support the promotion and incentivisation of the planting or regeneration of permanent indigenous forest over exotic species. However, we request that 'financial incentives' are included in the explanatory text to highlight the influence such incentives can have in achieving regeneration of permanent indigenous forest.	Include reference to financial incentives in the explanatory text to the policy, as one tool amongst others, that will assist to achieve the "right tree-right place".
S168.0122	Chapter 3.1A: Climate change	Objective CC.7	Support	Rangitāne o Wairarapa support provision for nature-based solutions to climate change.	Retain as notified.
S168.0123	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Rangitāne o Wairarapa support objectives, policies, rules and/ or methods to prioritise reducing greenhouse gas emissions.	Retain as notified.
S168.0124	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions -	Support	Rangitāne o Wairarapa support the requirement to consider the proximity of efficient transport networks for freight distribution centres or new development which will generate significant freight servicing requirements, to optimise freight movement and reduce GHG emissions.	Retain as notified.

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		consideration			
S168.0125	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Rangitāne o Wairarapa support the provision for nature-based solutions to climate change, however, the policy as currently worded, does not 'protect' them, as is stated in the explanatory text. We request that this policy includes more direction about how nature-based solutions should be protected, including for example through mechanisms such conditions. It is not sufficient for nature-based solutions to be simply a 'consideration' to which 'particular regard' is made through a resource consent, notice of requirement, change, variation or review of a district or regional plan.	Amend the policy to provide stronger protection for nature-based solutions, given the importance of such solutions in the region's climate change response.
S168.0126	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Rangitāne o Wairarapa seek that this policy is cross-referenced with Policy 52 to reflect the priority of soft engineering over hard engineering solutions in achieving nature-based solutions.	Provide a cross-reference to Policy 52 in this policy, to reflect the priority that soft engineering solutions should be given over hard engineering solutions, in order to provide for and protect nature-based solutions.
S168.0127	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Rangitāne o Wairarapa also seek that policy CC.12 is cross-referenced with Policy 52 to reflect the priority of soft engineering over hard engineering solutions in achieving nature-based solutions.	Provide a cross-reference to Policy 52 in policy CC.12, to reflect the priority that soft engineering solutions should be given over hard engineering solutions, in order to provide for and protect nature-based solutions.
S168.0128	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse	Support	Rangitāne o Wairarapa support the prioritisation in this policy that gross greenhouse gas emissions from agricultural land use are reduced as the first priority. However, we remain concerned that 'where practicable' weakens the strength of this policy and may not be sufficient to address the reductions needed in this sector.	The policy should be amended so that the term 'where practicable' is properly described within the policy and the circumstances in which actions must be regarded as being 'practicable' are stated.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		gas emissions - consideration			
S168.0129	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	We support the commitment in the s32 Report (i.e. Method CC.5): "The proposed package includes provisions to review the regional policy approach by 31 December 2024 (the date for notification of a full RPS review) to respond to any predicted changes in greenhouse gas emissions from the agricultural sector in the region and any new national direction" (pg 135).	Rangitāne o Wairarapa seek that the commitment in the Section 32 Report and in Method CC.5 to review this provision and subsequently to notify a plan change if necessary, by 31 December 2024, is upheld.
S168.0130	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	Rangitāne o Wairarapa support providing for actions and initiatives, particularly nature-based solutions to protect, enhance, or restore natural ecosystems.	Retain as notified.
S168.0131	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Rangitāne o Wairarapa strongly support the inclusion of nature-based solutions in the promotion and support for land management practices and / or land uses that improve climate change resilience. Provision of information on climate change data and projections to rural communities, and promotion and support for land management and use practices that reduce GHG emissions is also supported.	Retain as notified.
S168.0132	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Rangitāne o Wairarapa support in part the wording to partner with mana whenua in the decision-making process. However, we request that sub-clause (e) requires a range of tools and methods that 'give effect' to Te Mana o te Wai and Te Rito o te Harekeke, in order to be consistent with the relevant national policy statements. It is not sufficient to 'consider' these concepts.	Amend the policy to include wording that will 'give effect' to Te Mana o te Wai and Te Rito o te Harekeke, as required by the relevant national policy statements.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S168.0133	Chapter 4.4: Non-regulatory policies	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Rangitāne o Wairarapa support wording to assist tangata whenua in the development of iwi-led climate change adaptation plans.	Retain as notified.
S168.0134	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	Rangitāne o Wairarapa strongly support the promotion and support for planting and natural regeneration of forests to realise the benefits identified in the policy, particularly indigenous biodiversity, erosion control, protecting aquatic ecosystems and increasing social and economic well-being. However, Rangitāne o Wairarapa request that cultural well-being is included as one of the benefits which is subsequently maximised. Prioritising promotion and incentives for planting and regenerating permanent indigenous forest in preference to exotic species is also strongly supported.	Amend policy to read: "Promote and support the planting and natural regeneration of forest to maximise the benefits for carbon sequestration, indigenous biodiversity, erosion control, freshwater and coastal ecosystems, and the social, cultural , and economic well-being of local communities
S168.0135	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Rangitāne o Wairarapa strongly support the promotion of equitable public transport and active modes which are connected, accessible, affordable, supported by extensive multi modal infrastructure and services.	Retain as notified.
S168.0136	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse	Support in part	Rangitāne o Wairarapa strongly support providing policies, rules and methods to protect tangata whenua and communities from adverse health and amenity impacts from the discharges identified, as well as the phase-out of coal as a fuel source domestically and commercially. Rangitāne o Wairarapa support providing policies, rules and methods to support industry to reduce greenhouse gas emissions;	Clause (c) should be strengthened to include reference to supporting industry reductions that are consistent with national targets set to achieve the objectives of the Zero Carbon Act. Amend policy to support reductions in industrial GHG emissions that are consistent with national GHG emissions targets.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		gas emissions - regional plans			
S168.0137	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 2: Regional plan implementation	Support in part	Rangitāne o Wairarapa strongly support providing policies, rules and methods to protect tangata whenua and communities from adverse health and amenity impacts from the discharges identified, as well as the phase-out of coal as a fuel source domestically and commercially. Rangitāne o Wairarapa support providing policies, rules and methods to support industry to reduce greenhouse gas emissions	Amend policy to support reductions in industrial GHG emissions that are consistent with national GHG emissions targets.
S168.0138	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Rangitāne o Wairarapa support the recognition of cultural benefits alongside social, economic and environmental deriving from regionally significant infrastructure and renewable energy resources, where access to and use of the infrastructure and renewable energy sources, and therefore the benefits generated, are equitable and achieve, social, economic, cultural and environmental well-being. Consideration of benefits, protection and location of these resources in decision-making is also supported.	Retain as notified.
S168.0139	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support	Rangitāne o Wairarapa support the recognition of cultural benefits alongside social, economic and environmental deriving from regionally significant infrastructure and renewable energy resources, where access to and use of the infrastructure and renewable energy sources, and therefore the benefits generated, are equitable and achieve, social, economic, cultural and environmental well-being. Consideration of benefits, protection and location of these resources in decision-making is also supported.	Retain as notified.
S168.0140	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission	Support	Rangitāne o Wairarapa strongly support objectives and policies that promote reducing non-renewable fuel consumption, and transport-related GHG and pollutant emissions, and uptake of low emissions or zero-carbon fuel.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		fuels - Regional Land Transport Plan			
S168.0141	Chapter 4.5: Methods to implement policies (non- regulatory methods)	Method 33: Identify sustainable energy programmes	Support	Rangitāne o Wairarapa strongly support objectives and policies that promote reducing non-renewable fuel consumption, and transport-related GHG and pollutant emissions, and uptake of low emissions or zero-carbon fuel.	Retain as notified.
S168.0142	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	Rangitāne o Wairarapa strongly support the promotion of energy efficient design and alterations (particularly in provision of affordable housing), and installation of community scale renewable energy schemes.	Retain as notified.
S168.0143	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Rangitāne o Wairarapa support the 100-year planning horizon and risk-based approach proposed for the management of land development in areas at risk from natural hazards. Adopting this approach and using risk-based assessments as considerations in the decision-making process is also supported. We have whānau, hapū that are on the coastline that will be susceptible to hazards and will need management. There will need to be a tikanga and te ao Māori approach for how this happens as there are relationships to be established (Hapū moving into other Hapū whenua) as well as processes for relocating kōiwi (bones) or taonga.	Amend the policy to: Co-decide and engage with Tangata Whenua for these plans and support. Incorporate Mātauranga into the analysis.
S168.0144	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Rangitāne o Wairarapa support the 100-year planning horizon and risk-based approach proposed for the management of land development in areas at risk from natural hazards. Adopting this approach and using risk-based assessments as considerations in the decision-making process is also supported. We have whānau, hapū that are on the coastline that will be susceptible to hazards and will need management. There will need to be a tikanga and te ao Māori approach for how this happens as there are relationships to be established (Hapū moving	Amend the policy to: Co-decide and engage with Tangata Whenua for these plans and support. Incorporate Mātauranga into the analysis.

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				into other Hapū whenua) as well as processes for relocating kōiwi (bones) or taonga.	
S168.0145	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	<p>Rangitāne o Wairarapa support Policy 52 in part, where it seeks to determine whether soft engineering is more appropriate and to avoid hard engineering methods unless it is necessary. However, we consider that the words 'suitably innovative' could be subjective and therefore problematic to assess when considering this policy.</p> <p>Rangitāne o Wairarapa support reference in sub-clause (f) to give particular regard to sites of significance to mana/tangata whenua. However, we are concerned that as currently worded, this clause is inappropriately restricted only to those sites 'identified in a planning document'. Many sites will not be documented or identified until the resource consent or notice of requirement stage, and such sites should not be excluded from consideration through those processes.</p> <p>In addition, we request the inclusion of 'taonga species' in sub-clause (e), to be consistent with and give effect to the NPS IB.</p>	<p>Amend the policy to:</p> <p>Delete the text 'or suitably innovative solution';</p> <p>Include reference to 'taonga species' in sub-clause (e);</p> <p>To make clause (f) inclusive of other sites of significance which may not be 'identified in a planning document';</p> <p>Use terminology consistent with the NPS IB, i.e. 'indigenous biodiversity', rather than "local indigenous ecosystem and biodiversity".</p>
S168.0146	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support	<p>Rangitāne o Wairarapa support the list of matters that are required to be given particular regard when considering proposed development that may affect land transport outcomes. However, Clause (e) should be amended to ensure that public transport provision is sequenced such that the 'period of time where public transport is not efficient and / or practical' is minimised to the extent possible.</p>	<p>Amend Clause (e) to reflect a requirement to minimise any period where servicing of subdivision or development by public transport is likely to be inefficient or impractical, as far as practicable.</p>
S168.0147	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 17: Reducing waste and greenhouse gases emissions from waste streams	Support in part	<p>Food and soil sovereignty are key priorities for our people. Landfills have traditionally converted our whenua from fertile land to contaminated land and therefore we support methods to minimise unnecessary disposal to landfills.</p> <p>Rangitāne o Wairarapa support the provision for the waste management sector to work in partnership with mana whenua / tangata whenua, local authorities, industry and the wider community to address organic waste generation, collection and diversion from landfill and energy recovery from landfills. While nature-based solutions maybe implicit with organic waste (i.e. composting, anaerobic/aerobic digestion), we consider this preference for nature-based solutions should be explicitly expressed. It should also be made explicit that households should be encouraged to 'reduce at source'</p>	<p>We seek that this method is extended to provide for kaupapa Māori approaches to reducing waste to be implemented, along with kaupapa Māori methods for monitoring the success of this method.</p> <p>Amend the method to specifically encourage reduction at source through waste minimisation and household composting; and more generally, a preference for nature-based solutions for dealing with collected and diverted (from landfill) organic waste.</p> <p>Add to the method text to support the use of Mātauranga Māori to design, manage and monitor waste reduction and management solutions, particularly where these involve municipal landfills.</p>

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				by minimising food waste and composting at home that waste which is unavoidable.	
S168.0148	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support	Rangitāne o Wairarapa support Method IM.1 to partner with and provide support to mana whenua and require Māori data to only be shared in accordance with agreed tikanga and kawa Māori	Retain as notified
S168.0149	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.1: Climate change education and behaviour change programme	Support in part	Rangitāne o Wairarapa support the method, but consider that the wording of this method should be stronger, to ensure it is actually achieved.	Amend the method so that the programmes referred to are 'implemented', rather than 'enabled'.
S168.0150	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.2: Develop carbon emissions offsetting guidance	Support in part	Rangitāne o Wairarapa are strongly opposed to the use of carbon emissions offsetting to achieve GHG reduction targets, unless it can be clearly demonstrated that all other feasible measures have been taken to reduce GHG emissions. Notwithstanding this, Rangitāne o Wairarapa support Method CC.2 to develop carbon emissions offsetting guidance (for situations where no further emission reduction options remain), but request that a timeframe is attached to this method.	Insert a timeframe to this method which is consistent with the other climate change methods in the proposed plan change. The timeframe should be no later than 2024.
S168.0151	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Support in part	Rangitāne o Wairarapa support Method CC.4 in part, to prepare a regional forest spatial plan using a partnership approach. However, we request that a timeframe of 2024 is specified to have the regional forest spatial plan in place, to be consistent with the timing of the climate extension programme directed in Method CC.8. In addition, the method should include specific provision to monitor the effectiveness and efficiency of implementing the plan.	Amend the method to: Specify a timeframe of 2024 to have the regional forest spatial plan in place; Make specific reference to partnering with mana whenua/tangata whenua to prepare the regional forest spatial plan; Include a specific provision to monitor the effectiveness and efficiency of implementing the plans.
S168.0152	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.6: Identifying nature-based solutions for climate change	Support in part	Rangitāne o Wairarapa support Method CC.6 in part, to identify nature-based solutions for climate change, however, we request that the method is expanded to include another sub-clause specifying those ecosystems which provide nature-based solutions to natural hazard mitigation. Rangitāne o Wairarapa support provision for the council to partner with mana/tangata whenua to identify ecosystems that should be prioritised for protection, enhancement,	Amend the method to include a sub-clause identifying ecosystems that provide nature-based solutions to natural hazard mitigation.

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				and restoration; on the basis of their contribution as a nature-based solution to climate change.	
S168.0153	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.7: Advocating for the use of transport pricing tools	Support in part	<p>Rangitāne o Wairarapa support councils to advocate to central Government for new regulatory functions and tools for councils to manage congestion and GHG emissions within major urban areas; however, it is essential that any use of pricing tools and/or taxes is closely considered to ensure fair and equitable distribution of costs and inclusive transition to zero and low carbon transport. It will be crucial to ensure that a range of alternatives (particularly public transport) to private car use are available (through implementation of other policies, e.g., Policies CC.3 and CC.9, and Method CC.10) before financial policy instruments are applied.</p> <p>The issues around equity of the use of pricing tools or taxes and the need for complementary policies aimed at providing the necessary transport alternatives and encouraging transport mode shifts ahead of the use of pricing tools or taxes should be included in explanatory notes.</p>	Amend the Method to include explanatory notes for the Method that identify the potential for inequitable outcomes of applying financial policy instruments in the absence of policies, and methods that promote, incentivise and provide for transport modal shift.
S168.0154	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Rangitāne o Wairarapa support Method CC.8 in part, to develop a target extension programme to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change. However, we seek that incentives to support change are developed and included as part of this programme.	Amend the method to include the development of incentives to reduce agricultural submissions and increase rural land use resilience, as part of this programme.
S168.0155	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Oppose in part	<p>Rangitāne o Wairarapa oppose Method CC.9 in part and seek that specific provision is made for mana/ tangata whenua led programmes to be developed where priority indigenous ecosystems have been identified by Methods IE. 2 and CC.6.</p> <p>We also seek that these programmes are 'implemented'. The reference to CC.7 appears to be an error.</p> <p>The word 'indigenous' should be inserted to ensure the focus is on the appropriate biodiversity values.</p>	<p>Amend the method:</p> <p>To make specific provision for mana/ tangata whenua led programmes to be developed where priority indigenous ecosystems have been identified by Methods IE. 2 and CC.6;</p> <p>'To implement programmes that protect, enhance...' To replace text CC.7 with CC.6;</p> <p>To include the word 'indigenous' before 'biodiversity values'.</p>

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S168.0156	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.6: Identifying nature-based solutions for climate change	Support	Rangitāne o Wairarapa strongly support developing and promoting a range of incentives to support an equitable and inclusive transition to zero and low carbon transport.	Retain as notified.
S168.0157	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	Not stated	That a definition is included to define what is meant by ' indigenous ecosystems ' in the context of the RPS.
S168.0158	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support	Rangitāne o Wairarapa notes that the Introduction appropriately identifies that home ownership and access to affordable housing is exacerbated for Māori (lower ownership rates than national average). The Introduction includes reference to recognising and providing for regionally significant values and features, which includes values of significance to tangata whenua.	Retain as notified.
S168.0159	Chapter 3.9: Regional form, design and function	Issue A: Lack of housing	Support	Rangitāne o Wairarapa support the specific reference to Papakāinga, within the context of a lack of variety of housing.	Retain as notified.
S168.0160	Chapter 3.9: Regional form, design and function	Issue B: Inappropriate development	Support	Rangitāne o Wairarapa support acknowledgement of the adverse impact that inappropriate development has had on the relationship of mana whenua / tangata whenua with their culture, land, water, sites, wāhi tapu and other taonga.	Retain as notified.
S168.0161	Chapter 3.9: Regional form, design and function	Issue 1: Poor quality urban design	Support	Rangitāne o Wairarapa support acknowledgement that poor quality urban design can adversely affect the cultural practices and wellbeing of tangata whenua and communities.	Retain as notified.
S168.0162	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	Rangitāne o Wairarapa support the expansion of the clause specifically relating to supporting the ability for Māori to express their cultural and traditional norms to refer to 'providing for tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga'.	Amend subclause (g) of the policy to include "quality" in terms of the variety of homes that are provided for, as follows: (g) Provide for a variety of homes that meet the needs, in terms of quality , type, price, and location, of different households;
S168.0163	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy	Support	Rangitāne o Wairarapa support the amendment of the policy to reflect the NPS-UD terminology.	Retain as notified.

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		of regionally and locally significant centres - district plans			
S168.0164	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	Rangitāne o Wairarapa support expansion and amendment of the policy to reflect the NPS-UD provisions which relate to identifying areas for intensification and providing options for non-tier 1 Councils.	Retain as notified.
S168.0165	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	Rangitāne o Wairarapa support the strengthening and expanding of the policy to require Council's to identify and protect key industrial-based employment locations.	Retain as notified.
S168.0166	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	The direction that the Regional Land Transport Plan contain objectives and policies supporting well-functioning urban environments and a reduction in carbon emissions from transport is supported.	Retain as notified.
S168.0167	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use,	Support in part	Rangitāne o Wairarapa supports the inclusion of this broad overarching policy, in conjunction with a more specific policy containing matters for consideration. The requirement to acknowledge the importance of papakāinga and marae, use of Māori Purpose Zones, and	Amend subclause (e) of the policy to include specific reference to "Mātauranga Māori": (e) recognising Te Ao Māori and Mātauranga Māori , and

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		development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans		providing for development of Māori owned land is supported. However, we request that an explicit reference to Mātauranga Māori is included in the policy.	enabling mana whenua / tangata whenua to exercise Kaitiakitanga;
S168.0168	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support in part	Specific direction to territorial authorities is supported; however Rangitāne o Wairarapa seek that the policy wording is strengthened and a reference included to adopting Kaupapa Māori based models or frameworks that provide an opportunity for tangata whenua to help build iwi social, cultural, environmental and economic capacity, and to express their relationship with their culture, land, water, sites, wāhi tapu and other taonga.	Amend the policy as follows: When considering an application for a resource consent, notice of requirement, or a plan change of a district plan for use or development, particular regard shall be given the ability to enabling Māori to express their culture and traditions in land use and development, by as a minimum, providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and by providing opportunities for a Kaupapa Māori outcomes-based framework to be applied to future urban development", or wording that provides similar relief.
S168.0169	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support	Rangitāne o Wairarapa support the inclusion of cultural and health facilities in Clause (b)(iii) and assessing a proposal's contribution to affordable housing in Clause (b)(iv).	Retain as notified.
S168.0170	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with	Support	Rangitāne o Wairarapa support the enabling of infrastructure that supports the uptake of zero and low carbon multi-modal transport, that contributes to reducing GHG emissions through district plans. Requiring consideration of transport demand optimisation, and maximising transport mode shift away from private vehicles in planning decisions is also supported.	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		transport infrastructure - consideration			
S168.0171	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	The requirements to provide for actions and initiatives, particularly nature-based solutions, that contribute to climate-resilient urban areas is supported. Nature-based solutions should be informed by mātauranga Māori. However, Rangitāne o Wairarapa notes that the target and date for restoring tree canopy cover has been weakened from previous draft provisions, from 30% by 2030 to 10% by 2030 and 30% by 2050.	Amend the policy to reference that the use of nature-based solutions should be informed by mātauranga Māori.
S168.0172	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Recognition and provision for values of significance to tangata whenua is supported; however, subclause (a)(ii)(7) should be expanded to provide for the matters set out in s.6 of RMA. The same issues affect both urban expansion and rural development, therefore this policy and Policy 56 should be amended to be consistent and to address the same matters.	Amend subclause (a)(ii)(7) of the policy to recognise and provide for the matters in Section 6(e) and 6(g) of the RMA, rather than 'values of significance' to tangata whenua. Amend as necessary, together with Policy 56, to ensure consistency between the two policies.
S168.0173	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Provisions partially amended to reflect suggested amendments (Amend Policy 56, 2 May Hui). Recommended amendment to consider whether the proposal is resilient to climate change and provides for adaptation in accordance with CC adaptation policies of the RPS has not been included in the amendment.	Include a requirement for consideration of whether the proposal is climate change resilient and provides for adaptation in accordance with the relevant climate change policies;
S168.0174	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Clause (a) combines issues that should be addressed separately as they relate to quite separate matters (i.e. loss of productive land, reverse sensitivity issues).	Address the issue of loss of production land and reverse sensitivity as two separate matters, rather than as part of the same clause, as they are not necessarily related;
S168.0175	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Reference to 'aesthetic' values in clause (b) is inappropriately narrow and should be replaced by reference to 'amenity' values, which would cover a broader range of relevant values.	Amend the policy to: Replace reference to 'aesthetic' values with a broader reference to 'amenity' values;
S168.0176	Chapter 4.2: Matters to	Policy 56: Managing development	Support in part	Rangitāne o Wairarapa notes that the National Policy Statement - Highly Productive Land has now been published. The policy should be reviewed to ensure that it	Review the policy to ensure it is consistent with and gives effect to the National Policy Statement - Highly Productive Land.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	be considered	in the rural areas - consideration		is consistent with and gives effect to this National Policy Statement.	
S168.0177	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	The explanatory note for Policy 56 does not appear to relate to the policy and causes confusion.	Amend the explanatory text to better reflect the matters covered by Policy 56 and ensure consistency with the explanation for Policy 55.
S168.0178	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support	Rangitāne o Wairarapa supports the content and intent of this policy.	Retain as notified.
S168.0179	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support	Rangitāne o Wairarapa supports the content and intent of this policy.	Retain as notified.
S168.0180	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support	The inclusion of nature-based solutions for attenuation and retention is supported.	Retain as notified.
S168.0181	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-	Support in part	It is noted that this policy covers a range of matters, potentially not all of which non-regulatory - see clause d in particular. The inclusion of subclause (f) relating to partnering with mana whenua / tangata whenua to develop papakāinga design guidelines that are underpinned by Kaupapa Māori is supported. However, the clause only needs to refer to partnering (as this is the same as working together).	Amend clause (f) of the policy to read: "work together and partnering with mana whenua / tangata whenua to prepare papakāinga design guidelines that are underpinned by kaupapa Māori."

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		functioning urban environments - non-regulatory		The amendment of subclause (d) to substitute "encouraging" with "providing for" and the inserted reference to meeting "cultural" needs along with social and economic needs is supported. The explanation provided for Policy 67 does not address the range of matters covered in the policy. The Explanation should be expanded.	Provide a more comprehensive explanation of the policy.
S168.0182	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 1: District plan implementation	Support in part	Implementing the process of amending district plans as soon as practicable is supported. It would be helpful if the method included an end date by which this process should have occurred.	Specify an end date by which this process should have occurred.
S168.0183	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support	The inclusion of provision for dedicated Papakāinga Design Guidance based on Kaupapa Māori and produced in partnership with mana whenua / tangata whenua, and linkage to Policy 67(f) is supported.	Retain as notified
S168.0184	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Support	Rangitāne o Wairarapa notes that the NPS-UD requires development of the FDS to be informed by (inter alia) "Māori, and in particular tangata whenua, values and aspirations for urban development.	Retain as notified
S168.0185	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 3: Wellington Regional Land Transport Plan implementation	Support	The specified timetable for commencing the process to amend the RLTP is supported.	Retain as notified
S168.0186	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 4: Consideration - resource consents, notices of requirement and when changing, varying or	Support	Key policies relating to issues important to mana whenua / tangata whenua are explicitly covered in the method. The requirement to implement the range of policies is supported.	Retain as notified

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		reviewing plans			
S168.0187	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support in part	Rangitāne o Wairarapa seek that reference to 'undertaking research' is more explicit about the potential for the application of Mātauranga Māori (or research tools based on this) to inform natural hazard decision making and understanding.	Amend the method to include reference to Mātauranga Māori based research/monitoring tools: 'Undertake research (including use of Mātauranga Maori based research/monitoring methods) , prepare and disseminate information about natural hazards and climate change effects in order to:'
S168.0188	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Inclusion of this Method is supported. While the provisions relating to identifying appropriate areas and species for tree planting / natural regeneration in farm plans is supported, the clause should express a preference for native species of vegetation for planting / natural regeneration. Provision (e) identifying other on-farm nature-based solutions that will increase the resilience of a farm system and/or catchment to the effects of climate change is supported.	Amend clause (d) of the method to include a preference for native species of vegetation for planting / natural regeneration in farm plans as part of implementing the regional spatial forest plan.
S168.0189	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Support	Rangitāne o Wairarapa support the integration of hazard risk management and climate change adaptation across the region.	Retain as notified
S168.0190	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 46: Develop complex development opportunities	Support in part	The method refers to joint development of implementation plans and frameworks for each Complex Development Opportunity with central government agencies only. Rangitāne o Wairarapa consider that tangata whenua interests should also be represented as part of this process, as Te Tiriti partners.	Include reference to tangata whenua/mana whenua as being included in the development of any joint framework or implementation plans.
S168.0191	Chapter 3: Resource management issues, objectives and summary of	Overarching Issue 3: Lack of mana whenua / tangata whenua	Support in part	Rangitāne o Wairarapa support the inclusion of the overarching resource management issues, in particular Issue 3, which addresses the lack of tangata whenua involvement in decision making. However we consider this issue statement could be stronger and reflect the language is s6(e) of the RMA.	Amend the introductory text as follows: As a result, mana whenua / tangata whenua values and the relationship of Maori and their culture and traditions with their ancestral lands, water, air, sites, waahi tapu and other taonga have not been adequately provided for in resource management, causing

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	policies and methods to achieve the objectives in the Regional Policy Statement	involvement in decision making			disconnection between mana whenua / tangata whenua and the environment. or by alternative wording that provides similar relief.
S168.0192	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	Rangitāne o Wairarapa support the objective, particularly the reference to integrated management being guided by Te Ao Māori and incorporating mātauranga Māori. However, we consider tangata whenua relationships with the natural environment should also be included in clause (c) and that the life-supporting capacity of ecosystems should be a separate clause.	- amend clause (c) of the objective to states: protects and enhances mana whenua / tangata whenua values and relationships with the taiao , in particular mahinga kai, or by alternative wording that provides similar relief and that addresses the full range of relevant matters in s6(e) of the RMA;To separate out the 'life-supportingcapacity of ecosystems' so this becomes a separate clause and an additionalmatter to protect and enhance;
S168.0193	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	This objective should be amended to acknowledge that mātauranga Māori will only be incorporated where this is led and undertaken by mana whenua/tangata whenua.	Amend objective to include that mātauranga Māori will be led and undertaken by mana whenua and tangata whenua
S168.0194	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the	Overarching Objective A	Support in part	How does this overarching objective interact with other objectives in the plan, particularly if there is a conflict in terms of outcomes?	Clarify the status of the objective in relation to other objectives of the plan and include a policy or some other mechanism to explain how the overarching objective should be applied alongside the other objectives of the RPS.

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	objectives in the Regional Policy Statement				
S168.0195	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Integrated Management Anticipated environmental results	Support in part	Rangitāne o Wairarapa support this, but consider the wording could be strengthened.	Amend the text as follows: Regional Council and Territorial Authorities collaborate to undertake integrated management of natural resources and recognise and provide for importance of Te Ao Māori and Mātauranga Māori in natural resources management and decision making. or by alternative wording that provides similar relief.
S168.0196	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.2: Protection and interpretation of Mātauranga Māori and Māori data	Support in part	Rangitāne o Wairarapa support the inclusion of this method. This method should be amended to be explicit that mana whenua and tangata whenua will determine how this is implemented.	Amend the method so that it explicit that mana whenua / tangata whenua will define how and when their data will be collected, stored, protected, shared, and managed, and how or when it might be modified or deleted.
S168.0197	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	The notified plan change is the first opportunity that Rangitāne o Wairarapa has had to fully comprehend how our statement of Te Mana o te Wai would be incorporated into the RPS. While we appreciate the opportunity to express this statement as we see fit, having now seen the structure of Objective 12, we have some concerns as to how this statement will be practically adopted and given effect to. It is not clear when the statement should be applied and when it shouldn't. As currently written Rangitāne o Wairarapa's statement includes several objectives, as well as other content which may be more effective if it was sitting in other parts of the RPS, such as in the policies or methods, or potentially in the Regional Plan.	Rangitāne o Wairarapa seeks to amend part of their Te Mana o te Wai statement to remove a whakataukī and the supporting text. "A notable example of this is from the writings of Whatahoro Jury: Ko Waiōhine ko Ruamāhanga ēnei e wairua tipu mai i Tararua maunga e oranga e te iwi. These are Waiōhine and Ruamāhanga. They are like mother's milk flowing out of the Tararua mountains for the prosperity of the people. Nā Whatahoro Jury 1841-1923"
S168.0198	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Oppose in part	Rangitāne do not agree that the whitua are appropriate to be defined as FMUs. Values, land uses, geology, climate influence parts of those whitua differently and the management responses may need to be different in those different areas. Rangitāne o Wairarapa note their position here that it is important that values for each of the FMUs	Amend the RPS to provide a policy or method which explains how the FMUs will be identified and defined in partnership with tangata whenua, along with the associated long-term visions; and how these matters will be incorporated in the RPS (for example through a future plan change). It is not appropriate to rely on the s32 report to explain this.

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				are defined, rather than relying on a broad, generic set of values.	
S168.0199	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Oppose in part	<p>In addition, if FMUs are being identified, clause 3.8 of the NPS FM directs that regional councils must also identify, if they are present: monitoring sites, primary contact sites, the location of habitats of threatened species, outstanding water bodies and natural inland wetlands within the FMUs. When will these matters be addressed and incorporated into the RPS? The section 32 report is silent on this.</p> <p>Clause (e) confuses several steps in the NOF process and this needs to be corrected.</p> <p>As whānau, hapū and Iwi - Rangitāne o Wairarapa, our wai is our top priority and we want to be the leading authority for this policy.</p>	<p>Rangitāne o Wairarapa seek that the FMUs are identified in the RPS and take into account tangata whenua mātauranga when defining them. The Whaitua's are too large to be defined as FMUs.</p> <p>The new policy or method must explain how items within each FMU listed in clause 3.8 of the NPS FM will be identified (monitoring sites, primary contact sites, the location of habitats of threatened species, outstanding water bodies and natural inland wetlands). Rangitāne o Wairarapa must be involved in this process of identification.</p> <p>We want to be the leading authority for this policy.</p>

S130 Renters United

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S130 Renters United					
S130.001	General comments	General comments - overall	Support	<p>Renters United is proud to support the Regional Policy Statement for the Wellington region ("the RPS"). We believe that the RPS supports our vision for an Aotearoa where everyone has access to a stable, warm, affordable home and where everyone can meaningfully enforce their human right to a decent home.</p>	Retain as notified.
S130.002	General comments	General comments - overall	Support	<p>The proposed changes set a clear direction that everyone deserves access to good housing. If we want to leave neighbourhoods that last generations we need to ensure that they don't contribute to an unsustainable climate.</p> <p>Renters live in poorer quality housing, don't benefit from rising land values, and find it hard to see a future where they have the option of renting a home that is stable, warm and affordable. The lack of good housing is a major contributor to the stress that renters face. A good home is beyond what's inside its four walls. A good home has plenty of local amenities, shared green spaces, and is well connected to other areas of the city.</p>	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S130.003	Chapter 3.1A: Climate change	Objective CC.3	Support	<p>Support the Greater Wellington Regional Council to maintain the regional emissions reduction target to stay within 1.5 degrees of warming above pre industrial levels, including 50% reduction by 2030 and net zero by 2050 and maintain links between transport and urban development during consents to ensure new developments will not increase emissions. It may sound ambitious, but it is necessary, and through denser, well connected communities, it is possible.</p> <p>Denser suburbs that are well connected by public transport with a reduced dependence on private motor vehicle transport are the best way to ensure that we're leaving neighbourhoods, and a sustainable climate, for generations to come.</p> <p>Many other countries have metropolitan areas that have seen the benefit of denser housing, and are now reaping the reward. Denser communities contribute to less emissions through reduced car dependence, affordability through more efficient land use, and happier communities through localised amenities and shared spaces.</p>	Retain as notified.
S130.004	General comments	General comments - overall	Support	Support the use of plain language in all areas of government, including local bodies like regional councils. Active participation is a core pillar of democracy and with more renters working longer hours or multiple jobs, they need to be able to easily read and understand changes to regulations that have implications for them, so they can provide their input and ensure that their voice is heard.	Ensure the provisions use plain language.

S88 River Wicks

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S88 River Wicks					
S88.001	General comments	General comments - overall	Not Stated / Neutral	Supports the requiring developers to prove they won't put an undue burden of cars on our roads as empirically car-centric low-density housing is expensive in cost, negative for the environment, and alienates New Zealanders from each other by placing greater distance between them. It also produces large amounts of noise pollution, which has severe and hard-to-understate negative effects on all	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				aspects of our health. Infrastructure lasts a very long time. Let's not lock in the mistakes of the last century this century.	

S31 Robert Anker

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S31 Robert Anker					
S31.001	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose	The document contains the Fresh Water indicator in numerous places and whilst in some cases there is a clear linkage to NPS-FM there are many where the linkage is tenuous at best. The preamble specifies the criteria for determining the scope of a freshwater planning instrument - namely that there should be a direct relationship to freshwater quality or quantity. Council has indicated which parts of Change 1 meet at least one of the tests now required to form part of a freshwater planning instrument. This process and logic have not been applied in a consistent fashion.	Examine the document and remove the FW indicator from those parts of the document where it fails to meet the specified criteria Those parts will not comply with the scope of a freshwater planning instrument but will fall under a Section 1 process.
S31.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1: Adverse impacts on natural environments and communities	Not Stated / Neutral	Communities and nature have always been and will always be exposed to the impacts of climate. Nothing within the RPS will reduce that impact and the focus should be on putting measures in place that will deal with the consequences that will arise. We should be using this time between waves to shore up our protections, not abolish them.	GWRC to focus on positive measures that can mitigate climate generated impacts.
S31.003	Chapter 3: Resource management issues, objectives and	Overarching Issue 3: Lack of mana whenua / tangata	Not Stated / Neutral	This raises the question as to what equals sufficient weight. It is not appropriate to address a perceived imbalance by setting about creating another and larger imbalance. Throughout the document there is focus on consulting the Maori portion of the community, but the same emphasis is not being given to consulting the	Address the lack of consultation across all sectors of the community and not favour one to the exclusion of others.

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	summary of policies and methods to achieve the objectives in the Regional Policy Statement	whenua involvement in decision making		remainder and numerically larger section of the community. GWRC has an obligation to represent and take care of all population groups of the Region and not to deliberately disenfranchise one or more groups of people.	
S31.004	Chapter 3.1A: Climate change	Climate change introductory text	Not Stated / Neutral	The reality of global greenhouse emissions is that even if NZ was to eliminate all of its emissions it would have zero impact on the global situation but would cripple our economy. If we are to cope with the results of climate change, we need to have the strongest economy that we can generate which will give us the resilience to mitigate the inevitable consequences of changing weather patterns and sea levels. To take measures that create a negative impact on our economy for little more than a bureaucratic feel-good factor is counterproductive.	Ensure that the need for a strong economy is recognised and measures put in place to promote commerce and agriculture as key elements of the RPS.
S31.005	Chapter 3.1A: Climate change	Climate change introductory text	Not Stated / Neutral	Opening statement says that we are already locked into continued global warming until at least mid-century. Action item 1 is diametrically at odds with that statement. Need to clarify which one of these contradictory positions GWRC wants to adopt.	Amend the key areas of action for climate change to be consistent (including action 1- methane reductions offer a significant opportunity for global cooling in the short-term).
S31.006	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	Not a short-term solution but if done properly through plantation forests that are sequentially harvested it can both lock in carbon and produce an ongoing economic benefit. Forests can be a mix of both fast growing, high value timber and crop producing trees.	Amend paragraph in The key areas of action (p.9): 2. Increase greenhouse gas sinks through carbon sequestration, while recognising that this is only a short-term solution, and that the focus must be on reducing gross GHG emissions.
S31.007	Chapter 3.1A: Climate change	Climate change introductory text	Oppose in part	This clause sees the introduction of the concept of restoration, which is inadequately defined in the definitions section of the RPS. There is no argument with protecting that which currently exists but issue is taken with the concept of returning something to a loosely defined prior state.	Amend paragraph in The key areas of action required...(p.9) 3. Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S31.008	Chapter 3.1A:	Climate change	Oppose in part	This wild goose has long flown with the target of 1.5 C already exceeded. Need to stop focus on what we cannot	Amend paragraph in The regionally significant issues..(p.9) to read: 1. Net Greenhouse gas emissions must be reduced.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	Climate change	introductory text		do and pay greater heed to what we can do. The greatest amount of effort must be directed at that which we can do best.	significantly, immediately and rapidly Immediate, rapid, and large-scale reductions in greenhouse gas emissions are required to limit global warming to 1.5°C,....
S31.009	Chapter 3.1A: Climate change	Climate change introductory text	Oppose	This statement amounts to a pure throwaway line and there is no evidence to support the contention that climate change is damaging biodiversity. Instead of there being a decrease in indigenous biodiversity there is evidence to indicate that the converse is the case. Statements should only be made when they are able to be evidentially supported.	Delete Clause 2 (under the section "The regionally significant issues, and the issues of significance to the Wellington region's iwi authorities for climate change" p.10).
S31.010	Chapter 3.1A: Climate change	Climate change introductory text	Oppose in part	This statement is made from a pre-conceived point of view and is not based on evidential analysis. There are numerous examples of hard engineered protection works throughout the world that have given and continue to give the protection that they were designed to achieve. Closer to home the entire Hutt valley is protected from periodic flooding by the stop bank system and there will only be any increased risk if there is a failure to maintain them.	Amend paragraph 3 in the regionally significant issues section (p.10) to read: 3. The risks associated with natural hazards are exacerbated by climate change The hazard exposure of our communities, land, infrastructure, food (including mahinga kai), and water security is increasing because of climate change impacts on a range of natural hazards. Traditional approaches to development that have not fully considered the impacts on natural systems, and our over-reliance on hard engineered protection works, which will inevitably become overwhelmed and uneconomic to sustain, will ultimately increase the risk to communities and the environment.
S31.011	Chapter 3.1A: Climate change	Climate change introductory text	Oppose in part	The concept that somehow there will be a greater impact for Maori than on the rest of the community is patronising. Climate change effects will not discriminate on the basis of ethnicity. Seek to better reflect the obligation of GWRC to consider the community in its entirety.	Amend paragraph 4 (p.10) to read: 4. The impacts of climate change will exacerbate existing inequities The impacts and costs of responding to climate change will not be felt equitably, especially for Māori . Some communities have no, or only limited, resources to enable mitigation and adaptation and will therefore bear a greater burden than others, with future generations bearing the full impact.
S31.012	Chapter 3.1A: Climate change	Climate change introductory text	Oppose in part	Provision lacking in balance. Where any community chooses to locate is the result of a number of factors, all of which were relevant at the time that the decision was made. Proximity to water for both transport and life support, proximity to raw materials and to food supply are all influencing factors globally.	Amend paragraph 5 (p.10) to read: 5. Climate change threatens tangible and spiritual components of Māori Community well-being

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S31.013	Chapter 3.4: Fresh water (including public access)	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Oppose	This aspect is suggesting an action which would be illegal, and it is not appropriate for GWRC to be aligning itself with KkW Policy 10. In doing so they would appear to be encouraging others to commit an offense. It is not the place of GWRC to selectively observe legislation.	Remove KkW Policy 10.
S31.014	Chapter 3.8: Natural hazards	Natural hazards introductory text	Oppose in part	The inclusion of this phrase is not necessary and implies that the effect on Iwi is deserving of special mention and differs from the effect on other sectors of the community.	Amend the regionally significant issues (p.69) to read: The regionally significant issues and the issues of significance to the Wellington region's iwi authorities for natural hazards are:
S31.015	Chapter 3.8: Natural hazards	Natural hazards introductory text	Not Stated / Neutral	While there may be truth in this statement it should also be recognised that the converse is also true - eg. Hutt River stopbanks.	Amend paragraph 2 in the regionally significant issue section (p.69) to read: 2. Human actions can increase or decrease risk and consequences from natural hazards
S31.016	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Not Stated / Neutral	There are many situations where a change in agricultural practice will result in both an increase and a decrease in emissions. The focus should be on the net change and not focus on only one side of the equation.	Amend the policy to read: Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in gross net greenhouse gas emissions from agriculture.
S31.017	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional	Not Stated / Neutral	Offsetting through carbon sequestration is a viable, long-term solution. GWRC may seek to reduce emissions and might even, to some extent, succeed. The emphasis on	GWRC review the calculations which have been used to support the concept that permanent forest gives the best overall outcome taking all factors into consideration.

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		forest cover and avoiding plantation forestry on highly erodible land - regional plans		permanent indigenous forest has little to do with whether it is the most effective course of action to sequester carbon but is greatly influenced by a philosophical mindset. Forest, comprised of any species, will only produce a net storage of carbon while it is in an active growing phase. Once the forest is mature it reaches a state of limbo where there is no longer a net absorption of carbon and as trees within the forest die and fall to the forest floor and rot, the forest becomes a net emitter of methane.	GWRC to produce the scientific evidence for scrutiny and peer review.
S31.018	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	Consider that the phrase " and their restoration is promoted" should be deleted from the RPS.	Amend clause (c) to read: (c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;
S31.019	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	The exposure draft indicates that SNA area plans will need to be notified within 5 years from the commencement date which date has not yet occurred. By introducing a date of June 2025 GWRC is attempting to pressure already overloaded local authorities to produce SNA maps without adequate time for community consultation.	Amend the policy to read: By 30 June 2025 Within 5 years from the commencement date of NPS-IB , District and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:
S31.020	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	It is recognised that there are values and standards that are of significance to the Maori community and as long as those values and standards remain within that community then there is no conflict. However, once you attempt to introduce those standards into the wider community then you need to need to establish who, what, why and where.	Refine the RPS to address these factors and meet their obligation to the community

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S31.021	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Not Stated / Neutral	Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region. Policy 30 does not identify any hierarchy. This is unclear.	Amend the Explanation to read: Explanation Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region for.....
S31.022	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	Policy 31 is an unnecessary inclusion that has the potential to cause confusion. NPS-UD clearly specifies how Local Authority District Plans are to be amended to give effect to the NPS and Policy 31 is attempting to insert another layer of bureaucracy in the process. As such Policy 31 adds nothing but the potential for confusion as to whether the Regional Policy Statement or the National Policy Statement prevails.	Delete Policy 31 from RPS
S31.023	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Oppose	Policy 32 is regurgitating clear direction that is contained in NPS-UD and as such is redundant and should be removed.	Delete Policy 32 from the RPS
S31.024	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose in part	It is highly questionable as to whether such an exercise has been undertaken for GWRC EV bus fleet. If such an assessment has been done then GWRC should include it in the RPS document as an example of how such a calculation should be presented and subjected to peer review.	GWRC to include the whole of life carbon emissions assessment calculation for its EV bus fleet as an example of what is being required.
S31.025	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse	Not Stated / Neutral	In focussing on gross emissions GWRC is only looking at part of the picture. There are always two sides to any equation, and it is more than possible to decrease gross emissions by say 10% but at the same time reduce an offsetting factor by say 20%. In that case the gross picture would show an emissions reduction, but the net	Amend the policy to read: Policy CC.13: Managing agricultural gross net greenhouse gas emissions - consideration

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		gas emissions - consideration		picture would reveal an increase. Whilst Agriculture is a large numerical component of emissions it is also the sector which has shown one of the largest proportional reductions. It must also be recognised that agriculture provides a very large GDP and export contribution to the economy.	
S31.026	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would be impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. Not only will there need to be effective consultation with the landowner where the SNA is situated but there would also need to be another layer of consultation for those landowners within the buffer zone. This concept has not been thoroughly thought through and GWRC has failed in its obligation to consult.	GWRC to clearly define the concept of buffering including all relevant factors and rules that would apply to the buffer zone. GWRC to undertake extensive community consultation prior to issuing a consultation document. It is not acceptable for GWRC to be left to make up detailed regulations on the fly.
S31.027	Appendix 3: Definitions	Medium density residential development	Oppose in part	This definition on page 221 is incorrect in that it states "minimum" whereas it should be "maximum".	Amend the definition to read: Means areas used predominately for residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible activities with a maximum minimum building height of 3 stories.
S31.028	Appendix 3: Definitions	Nature-based solutions	Oppose in part	The inclusion of the reference to peatland within a definition constitutes an attempt to regulate by stealth. GWRC needs to clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not one single one has been consulted. The community feels very strongly regarding the high-handed approach taken by GWRC and the devious manner in which it appears to be trying to gain control of all aspects regarding the peatland. The community perception is highly influenced by the past track record of GWRC in taking punitive action against this community.	Remove bullet point under the example section, to read: Examples include: ... • protecting peatland to retain carbon stores
S31.029	Appendix 3: Definitions	Nature-based solutions	Oppose in part	The inclusion of the reference to peatland within a definition constitutes an attempt to regulate by stealth. GWRC needs to clearly state what it means by	GWRC be instructed to cease and desist in yet another attempt to gain control over the Mangaroa peatland.

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				<p>"protecting" peatland and exactly what form that protection would take.</p> <p>The Mangaroa peatland overlay encompasses over 75 individual landowners and not one single one has been consulted.</p> <p>The community feels very strongly regarding the high-handed approach taken by GWRC and the devious manner in which it appears to be trying to gain control of all aspects regarding the peatland. The community perception is highly influenced by the past track record of GWRC in taking punitive action against this community.</p>	GWRC be required to formulate extensive policies and methodologies regarding the peatland and the implications around loss of use by landowners.
S31.030	Appendix 3: Definitions	Protect (in relation to indigenous biodiversity)	Oppose	This is another definition that is draconian in that it can be read to cover everything everywhere if GWRC believes it to be appropriate. Again there has been no consultation and its wide sweeping nature can be viewed as abuse of power by GWRC.	Require GWRC to engage in meaningful consultation with the community regarding the powers that is seeking to give to itself.
S31.031	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it should not be undertaken without extensive community consultation and support.	Insert a clause requiring GWRC to engage with the community and only proceed with community approval in each case.
S31.032	Appendix 3: Definitions	Te Rito o te Harakeke	Oppose in part	<p>Te Rito is not about indigenous biodiversity but is about the importance of family in its widest sense. You ask me - what is the most important thing - it is people, it is people, it is people. The concept is that if you take out the young then the family will disintegrate and scatter asunder.</p> <p>Te Rito has been hijacked by ecologists who have made up 6 factors to suit their own agenda.</p>	Delete reference to Ti Rito in connection with biodiversity.
S31.033	General comments	General comments - overall	Oppose	<p>The submitter referred to Clause 44 of Preamble to the Proposed Regional Policy Statement. Council order paper (p.10) (18 August 2022)</p> <p>This clause clearly states that it is the deliberate intention of GWRC to use the RPS to create a change in the directives contained in NPS-UD by wrapping constraints around housing intensification direction. In doing so GWRC is acting Ultra Vires and is once again following the path for which it was severely admonished by the Environment Court in that it is making regulation by fiat. All Councillors have made themselves a party to this intention and are jointly and severally responsible for it. The community is increasingly troubled by the council's apparent belief that it has the right, power and mandate to regulate matters more properly the domain of central government, and to ignore limits imposed by central government where the council disagrees. It is not the place of the GWRC to be the self-appointed</p>	Amend the document to remove any and all clauses that seek to implement the intention stated above which is contrary to the intent and direction contained in NPS-UD.

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				arbiter in deciding which parts of Government policy contained in a NPS it will choose to fully implement. Local government's role is to implement what central government has mandated, not to go beyond and create regional inconsistencies.	
S31.034	Chapter 3.1A: Climate change	Climate change introductory text	Oppose	page 13 Council is required by the Resource Management Act 1991 to prepare a Regional Policy Statement and to give effect to national direction, including the National Policy Statement on Urban Development 2020 and the National Policy Statement for Freshwater Management 2020 See page 10 which states intent to constrain NPS-UD. GWRC cannot have it both ways - either they support the national direction or they do not.	Affirm that GWRC have a statutory obligation to give effect to NPS and not make up their own rules as they go along.
S31.035	General comments	General comments - overall	Oppose	Page 15, The focus of RPS Change 1 is to implement and support the National Policy Statement on Urban Development 2020 (NPS-UD), Another statement of support and again the intention to constrain makes this disingenuous.	Require GWRC to be consistent and not pose contradictory statements in the document.

S87 Roger O'Brien_Mangaroa Peatland Focus Group

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S87 Roger O'Brien_Mangaroa Peatland Focus Group					
S87.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S87.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and	Delete the phrase "and their restoration is promoted".

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		health of water bodies - regional plans		has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S87.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S87.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.	That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.
S87.005	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective -	Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each

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				<p>whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. The assessment of what is needed to restore a habitat etc. should not come down to the subjective opinion of a council official, given that GWRC has strongly stated environmental goals.</p> <p>Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.</p>	case.

S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)					
S165.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	<p>Objective A is not clear enough that as part of integrated management, the natural environment will need to be protected. A directive statement to that effect is required. While paragraph (c) provides: protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and there needs to be a broader requirement to protect the natural environment, not necessarily linked to mana whenua/tangata whenua values. The coastal environment needs to be referred to in this objective. Freshwater needs to be referred to in this objective. We are also unsure what the effect of the pōtai will be with respect to the listed considerations. We seek clarity on the relationship between 'guided by Te Ao Māori' and the listed considerations. The s32report states that this objective is</p>	<p>Include the following (or similar): (x) maintains and protects indigenous biodiversity, natural landscapes, and the life-supporting capacity of ecosystems (y) protects the coastal environment (z) protects freshwater [Note: end of amendments]</p> <p>Consider amending the pōtai to clarify how Te Ao Māori will interact the listed items. Ensure that protection and maintenance of indigenous biodiversity is paramount.</p>

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				intended to provide greater clarity, however the overarching consideration of Te Ao Māori introduces a potentially significant shift from current resource management thinking. While this may be desirable, further clarity is needed on what this would mean, and how this would flow down into interpretation of later RPS provisions and lower order plans.	
S165.002	Chapter 3.1A: Climate change	Climate change introductory text	Support		Retain as notified. Also, Te Rito o te Harakeke needs italicising to indicate it has a definition.
S165.003	Chapter 3.1A: Climate change	Objective CC.1	Support in part	Seek alignment with the Climate Change Response Act 2002 which requires all greenhouse gases, other than biogenic methane, to reach net zero by 2050.	Seek amendment: By 2050, the Wellington Region is a low-zero emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of: (a) sustainable air, land, freshwater, and coastal management, (b) well-functioning urban environments and rural areas, and (c) well-planned infrastructure.
S165.004	Chapter 3.1A: Climate change	Objective CC.2	Support		Retain.
S165.005	Chapter 3.1A: Climate change	Objective CC.3	Support	These targets are consistent with the policy direction from the Climate Change Response (Zero Carbon) Amendment Act 2019, the latest science from the IPCC, the National Emissions Reduction Plan and the National Adaptation Plan	Retain.
S165.006	Chapter 3.1A: Climate change	Objective CC.4	Support	Nature-based solutions are critical to our response to climate change and a core principle of the Emissions Reduction Plan.	Retain
S165.007	Chapter 3.1A:	Objective CC.5	Support	Controlling deer, goats and other browsers on regenerating native vegetation could have significant carbon benefits. [4]	Retain with amendment: By 2030, there is an increase in the area of permanent forest in the Wellington Region, and an

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Climate change			<p>[Note 4 references - https://www.doc.govt.nz/globalassets/documents/conservation/threats-and-impacts/animal-pests/wild-animal-control-emissions-management.pdf]</p> <p>Permanent forests become emitters of carbon if browsing herbivores are not managed [5]</p> <p>[Note 5 references - https://www.forestandbird.org.nz/resources/climate-change-and-introduced-browsers]</p>	equivalent increase in browser control , maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well-being
S165.008	Chapter 3.1A: Climate change	Objective CC.6	Support	This objective aligns with, and helps to give effect to, the National Adaptation Plan.	Retain
S165.009	Chapter 3.1A: Climate change	Objective CC.7	Support	This objective aligns with, and helps to give effect to, the National Adaptation Plan.	Retain
S165.010	Chapter 3.1A: Climate change	Objective CC.8	Support	This objective aligns with, and helps to give effect to, the National Adaptation Plan.	Retain.
S165.011	Chapter 3.3: Energy, infrastructure and waste	General comments - energy, infrastructure and waste	Support	Removal of references to out-of-date national policy direction is appropriate. [Note: submission reference to introductory text].	Retain.
S165.012	Chapter 3.3: Energy, infrastructure and waste	Table 3	Support	This is appropriate.	Retain consequential changes to the table to account for policy changes
S165.013	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Support in part	This provides a fairly accurate general overview. However, concerned that the margins of rivers, lakes and wetlands often fall through the cracks. These areas must also be recognised per section 6(a) of the RMA.	Amend the first paragraph as follows: Fresh water is integral to our health, wellbeing, livelihood and culture. Freshwater is essential for our economy and defines our landscape and sustains ecosystems. People value clean fresh water for many reasons - economic, recreational, aesthetic, ecological and cultural. It is a matter of national importance to protect wetlands, lakes, rivers, streams and their margins from

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					inappropriate use and development.
S165.014	Chapter 3.4: Fresh water (including public access)	Table 4	Support	This provides a fairly accurate table setting out policy titles and lead authorities.	Retain
S165.015	Chapter 3.4: Fresh water (including public access)	Objective 12	Support	Captures the concepts set out in the NPSFM	Retain.
S165.016	Chapter 3.4: Fresh water (including public access)	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Forest & Bird supports the inclusion of Te Mana o te Wai expressions.	Retain.
S165.017	Chapter 3.4: Fresh water (including public access)	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	Forest & Bird supports the inclusion of Te Mana o te Wai expressions	Retain
S165.018	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	NPSFM clause 3.3(1) requires every regional council develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement. Forest & Bird notes the GWRC has not included long-term visions, but that appropriate visions could be taken and adapted from Te Mahere Wai o Te Kāhui Taiao: Greater Wellington Regional Council -- Te Mahere Wai recommendations.	Include long-term visions for freshwater at the FMU level from Te Mahere Wai o Te Kāhui Taiao, insofar as these give effect to the objective and policies of the NPSFM.

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				[Note submission references Clause 3.3(1) - NPSFM]	
S165.019	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	<p>NPSFM clause 3.3 requires visions to be ambitious and clear on what the outcomes to be achieved are - noting that they are to be difficult to achieve but not impossible. There is currently no overarching vision for which the specific FMU visions are set to achieve. Forest & Bird notes the requirement to work with mana whenua and communities on developing FMU visions.</p> <p>The relevant goals within any vision objectives should all be achieved by, at most, 2040. Forest & Bird supports retaining shorter timeframes at the FMU level where these are proposed. Forest & Bird proposes an overarching vision for all FMUs in Greater Wellington to:</p> <ul style="list-style-type: none"> a. address any gaps left by visions at the FMU/part of an FMU scale; b. give effect to Objective 12. <p>[Note: submission in reference to Clause 3.3 NPS-FM]</p>	<p>Add a new overarching vision to apply to all FMUs in Greater Wellington as follows:</p> <p>"All of Greater Wellington catchment vision"</p> <p>By no later than 2040, in all Greater Wellington catchments:(1) Water bodies are protected, or restored to a state of good health, well-being and resilience,(2) Activities relating to water support the health, well-being and resilience of affected waterbodies,(3) The natural form and function of water bodies, including with respect to water quality, sedimentation and flows, mimics that of their natural behaviour,(4) Ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored,(5) Wetland, estuary and lagoon extent has been restored a much as practical where it has been lost, and their quality is protected and restored,(6) The habitat of indigenous freshwater species is protected and restored, and indigenous species are able to migrate easily within and between catchments, except where it is desirable to prevent the passage of some fish species in order to protect indigenous species, their life stages, or their habitats,(7) Food is available to be harvested from water bodies and is safe to consume,(8) People have abundant, quality opportunities to connect with and safely undertake recreational activities within or close to a wide range of water bodies,(9) There are no direct discharges of wastewater to water bodies.</p>

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					Make the required consequential amendments to specific FMU visions to ensure the overarching vision above applies to all of them while retaining FMU specific provisions and timeframes where these contain more stringent protection of the health and well-being of water bodies and freshwater ecosystems than provided for in the overarching vision
S165.020	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems introductory text	Support in part	Needs explanation to ensure it's clear how the plan is giving effect to the NPS-IB and therefore the RMA	The chapter introduction needs to include an explanation of Te Rito o te Harakeke to explain the link to the NPS-IB.
S165.021	Chapter 3.6: Indigenous ecosystems	Objective 16	Support in part	As written this objective does not give effect to s6(c) of the RMA and needs to include protection of significant habitats of indigenous fauna which could be exotic. Policies and methods need to align to give effect to s6(c) of the RMA.	Support protection and enhancement. However, this objective needs to be broader than just indigenous ecosystems and habitats to ensure protection of significant habitats of indigenous fauna. For example, macrocarpa shelter belts can be important roosts for long-tailed bats as can exotic pine forests for Powelliphanta snails. Seek consequential changes to policies and methods to ensure significant habitats of indigenous fauna are also protected as per comment above.
S165.022	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support	This is consistent with the RMA.	Retain
S165.023	Chapter 3.6: Indigenous ecosystems	Objective 16A	Oppose in part	The policies and methods need to give better effect to the RMA. Question how non-regulatory policies, particularly Policy IE.3, and methods are going to achieve the objective. Question how non-regulatory policies, particularly Policy IE.3, and methods are going to achieve the objective.	Suggest additional regulatory policy required to ensure maintenance of biodiversity as per council functions under s31 of the RMA.

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				[Note: submission refers to 'Policies and Methods to Achieve Objective 16A']	
S165.024	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support	This objective is appropriate.	Retain
S165.025	Chapter 3.6: Indigenous ecosystems	Objective 16C	Support	This objective is appropriate.	Retain.
S165.026	Chapter 3.8: Natural hazards	Natural hazards introductory text	Support	This is consistent with the RMA and higher order planning instruments	Retain.
S165.027	Chapter 3.8: Natural hazards	Objective 19	Support	This is consistent with the RMA	Retain as written
S165.028	Chapter 3.8: Natural hazards	Objective 19	Support	Consequential changes are appropriate. [Note: submission refers to 'Policies and Methods to Achieve Objective 19']	Support consequential changes to policies and methods to address relief sought in submission.
S165.029	Chapter 3.8: Natural hazards	Objective 20	Support	This objective is appropriate.	Retain
S165.030	Chapter 3.8: Natural hazards	Objective 21	Support	This objective is appropriate.	Retain.
S165.031	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	We acknowledge that the policy direction in the NPSUD is to provide for urban development; however, this is not to be provided at any cost. The adverse effects of development must be considered in undertaking all council functions and responsibilities, and in achieving the purpose of the Act.	Seek deletion of the directive language in the amended provisions that provide for urban development and expansion. Policies need to be subject to meeting other requirements such as s6 of the RMA.
S165.032	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Support	Supports the chapter Introduction and table of contents.	Retain.
S165.033	Chapter 4.1:	Policy 2: Reducing	Support		Retain

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	Regulatory policies	adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans			
S165.034	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	The terms "contribute to reducing" are redundant. The key focus must be to reduce greenhouse gas emissions.	District and regional plans shall include objectives, policies, rules and/or methods to require that all new and altered transport infrastructure is designed, constructed, and operated in a way that contribute to reducing reduces greenhouse gas emissions by: (a) Optimising overall transport demand; (b) Maximising mode shift from private vehicles to public transport or active modes; and (c) Supporting the move towards low and zerocarbon modes.
S165.035	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support in part	The requirement for travel demand management plans is supported. However, do not support the use of a threshold to trigger the requirement for such plans. It is unclear how "more than minor" will be determined in the context of greenhouse gas emissions whereby an individual's or group of individuals' emissions may be minor but nonetheless contribute cumulatively.	Delete the inclusion of a specified development threshold as follows: By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development. over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in

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					greenhouse gas emissions.
S165.036	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	Seek amendment to clarify to focus is on reducing greenhouse gas emissions. Also seek amendment to ensure that the enabling of infrastructure does not cause adverse effects for indigenous biodiversity.	Amend as follows: By 30 June 2025, district plans shall include objectives, policies, rules and methods that enables infrastructure that supports the uptake of zero and low-carbon multi modal transport that contribute to reducing reduce greenhouse gas emissions, while protecting indigenous biodiversity.
S165.037	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	This initiative is appropriate.	Retain.
S165.038	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	Amendments are needed to direct that emissions are not contributed to. Amendments are also needed to capture a wider range of sectors, such as the waste management sector (methane from landfills) and the expansion of ports (emissions from cruise ships).	Amend as follows: Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that contribute to greenhouse gas emissions or result in an increase in gross greenhouse gas emissions from agriculture.
S165.039	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land -	Support in part	It is ecologically responsible to prioritise the planting or restoration of indigenous vegetation over exotic. However, a wording change is required to ensure the policy is strengthened, and that there is policy support for other indigenous vegetation to be captured.	Amend as follows: Regional plans shall include objectives, policies, rules and/or methods that support require an increase in the area of permanent forest and wetlands in the region to contribute to achieving net-zero greenhouse gas emissions by 2050, while: (a) promoting and incentivising the planting or regeneration of permanent indigenous forest vegetation over exotic species, particularly on

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		regional plans			highly erodible land and in catchments where water quality targets for sediment are not reached, and Also amend the title to this policy to reflect the change sought.
S165.040	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	This accords with Te Mana o te Taiiao Aotearoa New Zealand Biodiversity Strategy 2020	Retain.
S165.041	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support in part	It is not appropriate for certain activities to be exempt from the requirement to prioritise reducing emissions over offsetting.	Amend as follows: District and regional plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply. Include additional policy direction to require that, where there is no possible alternative to reducing greenhouse gas emissions, offsets must be achieved by the planting of indigenous vegetation over plantation forestry
S165.042	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal	Support in part	This policy only provides protection for areas of high natural character in the coastal environment. NZCPS policy 13 requires the protection of all areas of natural character.	Amend this policy, or include a new policy, to ensure that all areas of natural character in the coastal environment are adequately protected in accordance with policy 13 NZCPS.

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		environment - district and regional plans		While the mapping requirement only extends to areas of high natural character, the obligation to avoid significant adverse effects applies more broadly (see NZCPS policy 13(1)(b) and (d)).	
S165.043	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	This policy is poorly drafted. It refers "to low and zero carbon regionally significant infrastructure", which is unclear.	Replace "low and zero carbon regionally significant infrastructure" with "regionally significant infrastructure that contributes to the achievement of the greenhouse gas emission targets in Objective CC.1" Make consequential amendments to explanation.
S165.044	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support in part	The policy provides for a reduction but is not linked to the specific reductions sought in Objective CC.3	Amend so that reductions provided for in the policy are linked to the reductions identified in Objective CC.3.
S165.045	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation	Support		Retain

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		- district plans			
S165.046	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support in part	The intent of the policy is supported but the drafting is poor, in particular the concluding words "by contributing to reducing greenhouse emissions" do not make sense	The Wellington Regional Land Transport Plan shall include objectives, policies and methods that achieve the greenhouse emission targets in Objective CC.3 , give effect to the promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle, by contributing to reducing greenhouse emissions.
S165.047	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	While the intent of this policy is supported, there is a risk that paraphrasing the implementation requirements of the NPSFM will change their meaning. The policy needs to be clear that the NPSFM requirements remain paramount, despite the paraphrasing in this policy.	Amend the policy: Regional plans shall give effect to Te Mana o te Wai and the implementation requirements of the NPSFM , and include objectives, policies, rules and/or methods that: Add a note at the bottom of the policy: Where there is a difference between the listed requirements above and those of the NPSFM, the NPSFM will prevail. Make any further amendments to ensure Part 3 of the NPSFM is given effect to.
S165.048	Chapter 4.1: Regulatory policies	Policy 13: Allocating water - regional plans	Support	Support deletion of outdated policy	Support deletion
S165.049	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on	Oppose in part	This policy appears to be restricted to the effects of urban development on freshwater. If that is the case, then the chapeau should be amended and policy (l) removed so that	Amend the chapeau as follows: In managing the effects of urban development , Regional plan objectives, policies, and methods including rules, must give effect to Te Mana o te Wai and in doing

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		freshwater and the coastal marine area - regional plans		mapping of rivers and wetlands is required generally and not just in relation to urban development. Further policies are required to ensure there is no further loss of extent of natural inland wetlands.	so must: ... Include a new policy: (x) require that urban development avoids the loss of extent or values of natural inland wetlands. Remove clause (l) and insert a separate standalone provision to direct the identification and mapping of rivers and wetlands
S165.050	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	Further components are required to ensure this policy is: a. in accordance with s6(a) and (c) of the RMA, b. gives effect to NPSFM Policies 6 and 7, and c. gives effect to NZCPS Objective 1 and Policies 11, 13, and 14. Amendments required for clarity and to ensure no further wetland loss, the protection of rivers and their margins. Sedimentation generated on land affects estuaries and harbours and these environments are not provided the same protection under the NPSFM as inland water bodies. A bespoke policy directing a reduction in sedimentation affecting estuaries and harbours is required.	Amend as follows: Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to minimise the extent necessary in order to achieve the target attribute states for water bodies and freshwater ecosystems, including the effects of these avoid adverse effects generated by these activities on the life-supporting capacity of soils, wetlands, rivers and their margins , and to provide for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. Include additional policy: (x) reduce sedimentation rates in the region's estuaries and harbours;
S165.051	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Reference to "community supplies" is vague and must be qualified. Otherwise, it could suggest water for third order priorities (i.e. social, economic and cultural wellbeing) is captured.	Amend (c) as follows: (c) the taking of water for community drinking water supplies; and
S165.052	Chapter 4.1:	Policy 18: Protecting	Support in part	Various amendments are required in order to ensure the direction and ecological	Amend as follows: Regional plans shall include policies, rules and/or

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	Regulatory policies	and restoring ecological health of water bodies - regional plans		<p>bottom-lines from the RMA, NZCPS and NPSFM are carried through. The NPSFM applies to natural inland wetlands and not coastal wetlands. Complementary policies in the NZCPS apply to coastal wetlands (NZCPS Policies 10, 11, 13, and 14). Accordingly, separate policy direction on coastal wetlands is appropriate.</p>	<p>methods that protect and restore the ecological health of water bodies including, which ensure the following:</p> <p>Remove coastal wetlands from clause (c) and include a new policy specifically for coastal wetlands that gives effect to the NZCPS as follows: (x)(i) avoid adverse effects of activities on NZCPS policy 11(a) values of coastal wetlands; (ii) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on any NZCPS policy 11(b) values of coastal wetlands; (iii) preserve the natural character of coastal wetlands in accordance with policy 13 NZCPS; (iv) promote restoration of coastal wetlands in accordance with policy 14 NZCPS; and (v) avoid reclamation in coastal wetlands in accordance with policy 10 NZCPS.</p> <p>Amend clauses (i),(j) and (k) as follows:</p> <p>(i) promoting the retention of retaining in-stream habitat diversity by retaining natural features - such as pools, runs, riffles, and the river's natural form;</p> <p>(j) promoting the retention of retaining natural flow regimes - such as flushing flows; (k) promoting the protection and reinstatement protect and reinstate of riparian habitat;</p> <p>Amend clauses (n)-(q) as follows:</p> <p>(n) discourage restricting avoiding the reclamation, piping, straightening or concrete lining of rivers;</p> <p>(o) discourage restricting avoiding stock access to estuaries, rivers, lakes and wetland;</p> <p>(p) discourage restricting avoiding the diversion of water into or from wetlands - unless the</p>

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					diversion is necessary to restore the hydrological variation to the wetland; (q) discourage restricting the removal or destruction of indigenous plants in wetlands and lakes; and Amend clause (r) as follows: (r) restoring and maintaining indigenous fish passage, except where it is desirable to prevent the passage of some fish species in order to protect indigenous species, their life stages, or their habitats.
S165.053	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support		Retain
S165.054	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support		Retain
S165.055	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Various amendments are required in order to ensure the direction and ecological bottom-lines from the RMA, NZCPS and NPSFM are carried through.	Amend (g) and (h) as follows: (g) Consider the avoid the adverse effects on freshwater and the coastal marine area of subdivision, use and development of land; (h) Consider control control the use and development of land in relation order to achieve target attribute states and comply with any limits set in a regional plan; Amend clause (p) as follows: (p) Consider promote daylighting of streams, where practicable; and

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S165.056	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	<p>Concerned that some councils have still not identified SNAs in their plans e.g. the recently notified Wellington DP does not include residential SNAs. Other councils have not identified SNAs at all yet. We strongly support the inclusion of a June 2025 deadline, as delaying any further is contrary to s6(c). However, we see a risk for councils such as Wellington CC, that have done the work to identify SNAs but have not included them in the plan. We submitted on the Wgtn DP that the residential SNAs should be immediately reincluded. Allowing a further 3 years in those circumstances is unacceptable. We therefore seek amendment to how the deadline is expressed.</p>	<p>Amend as follows (or words to the same effect): "As soon as possible, and in any event no later than by 30 June 2025" Amend explanation accordingly.</p>
S165.057	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	<p>Any delay to protecting SNAs should be the shortest possible. The requirement in policy 24(a)(i) should apply equally to compensation. Where compensation is proposed by an applicant, there must be sufficient certainty that the techniques, methods, site etc are appropriate to achieve the claimed biodiversity outcomes, even where those aren't quite an offset. This policy only deals with the limits to offsetting and compensation. However, district plans may not include full sets of principles. Including a full set in the RPS would aid consistency across the district plans. Additionally, Policy 47 directs considerations of the limits to offsetting in policy 24, but not any of the other generally accepted parameters for offsetting and compensation. Policy 24(c) could be misinterpreted as indicating only those areas and species identified in Appendix 1A are covered. Oppose Policy 24(d) as drafted. The reference to a net biodiversity benefit adds a</p>	<p>Amend as follows (or words to the same effect): "As soon as possible, and in any event no later than by 30 June 2025" Amend to apply the requirement in pol. 24(a)(i) to compensation. Include a full set of offsetting and compensation principles either in policy 24 or elsewhere in the RPS. Amend Policy to make it clear that the list is not exhaustive and if species or ecosystems meeting the criteria are identified elsewhere, they are covered by the policy. Delete Policy 24(d). Amend explanation accordingly.</p>

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				new concept that is unnecessary and adds complexity. The reference to a 10% gain or benefit is inappropriate. It is arbitrary and meaningless, especially in the context of compensation. The 10% requires some form of calculation of losses and gains and presupposes there is adequate information about the ecosystem that allows for such a calculation. There are situations where there may not be adequate information upon which to make such a calculation with the necessary level of accuracy.	
S165.058	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	Oppose deletion of avoid as this is inconsistent with the NZCPS.	Retain "Avoid inappropriate" in the original policy to give effect to the NZCPS. Seek retention of original wording as the term 'manage' is not appropriate and fails to achieve NZCPS Objective 19.
S165.059	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support in part	There is a mismatch between what this policy seeks (a reduction of transport emissions) and Objective CC.3, which seeks a reduction of 35% of 2019 transport emissions by 2030)	Amend to ensure that the reduction sought under Policy 33 reflects the requirements of Objective CC.3.
S165.060	Chapter 4.2: Matters to	General comments -	Oppose in part	Submission in reference to Chapter Introduction and Table of Contents Chapter 4.2. The introduction (above the table)	Amend as follows: This section contains the policies that need to be given

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	be considered	consideration policies		incorrectly states the weight to be given to the chapter's policies when changing or varying regional and district plans. Those plans must give effect to the RPS, not have particular regard to the RPS' provisions.	particular regard, where relevant, when assessing and deciding on resource consents or notices of requirement. The policies must be given effect to or when changing, or varying district or regional plans. Within this section, policies are presented in numeric order, although the summary table below lists the policy titles by topic headings.
S165.061	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support		Retain
S165.062	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Support		Retain
S165.063	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	The intent of this policy is supported in that it directs reduction; however it needs to contain stronger direction and link to achieving the specific reductions sought in Objective CC.3.	Amend as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether ensure the subdivision, use and development have been planned to optimise overall transport demand, maximising mode shift from private vehicles to public transport or active modes, in a way that achieves the greenhouse gas emission targets in Objective CC.3. contributes to reducing greenhouse gas emissions
S165.064	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse	Support in part	This policy should contain stronger direction and link to achieving the specific reductions sought in Objective CC.3.	Amend as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan for freight distribution centres and new industrial areas or similar activities with significant freight servicing requirements, particular regard shall be given to ensure the proximity of efficient

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		e gas emissions - consideration			transport networks and locations that will contribute to efficient freight movements in a way that achieves the greenhouse gas emission targets in Objective CC.3 and minimising associated greenhouse gas emissions.
S165.065	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support		Retain
S165.066	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Support recognising and providing for nature-based solutions, however stronger policy direction must be included. A direction to have "particular regard" is not strong enough, as it provides latitude for decision-makers to give little or no weight at all to such critical matters at the plan making or consenting stage.	Amend as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may adversely affect a nature-based solution to climate change and particular regard shall be given to avoiding any adverse effects on the climate change mitigation or adaptation functions must be avoided.
S165.067	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	Amendments required to require decisionmakers give more weight to the listed matters, and that the policy links to achieving the specific reductions sought in Objective CC.3.	Amend as follows: When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to ensure: (a) reducing gross greenhouse gas emissions are reduced in accordance with Objective CC.3 as a priority where practicable , and (b) where it is not practicable to reduce gross greenhouse gas emissions, achieving a

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					netreduction in greenhouse gas emissions, and (c) avoiding any increase in gross greenhouse gasemissions is avoided .
S165.068	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	Drafting improvement to link the reductions in greenhouse gas emissions to the targets in Objective CC.3	Amend Policy 39(a) as follows: the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions in a way that achieves the targets in Objective CC.3 ; and
S165.069	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Policy 40 is poorly drafted and not consistent with Policies 42 and 44 in relation to key matters. Policy 40 requires that, when considering a resource consent, particular regard must be had to giving effect to Te Mana o te Wai. This is poor drafting in that the policy should require that Te Mana o te Wai is given effect to. This can be compared with the Policy 42, which require that Te Mana o te Wai is given effect to and provide a range of matters that particular regard must be had to while giving effect to Te Mana o Te Wai. It is also inconsistent with Policy 44, which sets out outcomes that will be achieved by giving effect to Te Mana o te Wai. A requirement to avoid the loss of extent and values of natural inland wetlands is required. It is not clear how this policy would apply to coastal wetlands.	Replace the introductory words with "When considering an application for a resource consent the regional council must give effect to Te Mana o te Wai by:" Amend Policy 40(a) as follows: (a) requiring that water quality, flows and water levels and aquatic habitats of surface water bodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and wellbeing of water bodies and the health and wellbeing of freshwater ecosystems Add a further item: (x) avoiding the loss of extent or values of natural inland wetlands Make policy amendments to ensure that the NZCPS is given effect to in respect of coastal wetlands, inline with the submission on Policy 18 above, and any consequential amendments to the methods.

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S165.070	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	Amendments needed to ensure this policy aligns with the direction in the NSPFM, for example, its Objective and Policies 1, 3 and 9. Additional clause needed to ensure the maintenance and enhancement of coastal water quality is not overlooked and the NZCPS is also given effect to.	<p>Amend as follows:</p> <p>Policy 41: Controlling Minimising the effects of earthworks Earthworks and vegetation disturbance - consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to controlling for earthworks and or vegetation disturbance by to minimise, give effect to Te Mana o te Wai by: (a) erosion; and</p> <p>(a) considering whether the activity will achieve achieving environmental outcomes and target attribute states; silt and sediment runoff into water, or onto or into land that may enter water, so that healthy aquatic ecosystems are sustained; and (b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met;</p> <p>Include an additional clause addressing coastal environments: (x) when assessing an application for a resource consent for earthworks or vegetation clearance and any associated discharge of contaminant ensure that the activity avoids adverse effects on aquatic ecosystem health, indigenous biodiversity in coastal water and receiving environments</p>
S165.071	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban	Support in part	As in Policy 40, Policy 42 conflates "giving effect to" and "having particular regard to". These are separate concepts and the Council should be giving effect to Te Mana o te Wai	<p>Amend the introductory words as follows:</p> <p>When considering an application for a resource consent the regional council must give effect to Te Mana o te Wai by:</p> <p>Make consequential amendments, for example, in (a) adopt would need to be amended to adopting for the provision to make sense</p>

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		development - consideration			
S165.072	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Gives effect to the NPSFM Objective and Policies	Retain
S165.073	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose in part	Further amendments are required to ensure this policy meets the NPSFM objective and policies.	Amend the pōtai to Policy FW.5 as follows: When considering a change, variation or review of a regional or district plan give effect to the hierarchy of obligations in Te Mana o te Wai, as set out in Objective 2.1 of the NPSFM 2020 and have particular regard shall be given to:
S165.074	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	It is not appropriate to include new subclause (i), which refers to limits to offsetting and compensation, as a matter to be had particular regard to. A limit is something that has to be given effect to not had regard to. Require adherence to a full set of mandatory offsetting and compensation principles	Include (i) as a matter that has to be "given effect to", not "have regard to." Also include a requirement to give effect to a full set of mandatory offsetting and compensation principles, that are included in the RPS (as submitted above).
S165.075	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of	Oppose in part	The direction to "minimise" the risk and consequences of natural hazards on people, communities, their property and infrastructure" is inconsistent with NZCPS Policy 25. More broadly, it is an	Amend the heading and chapeau to Policy 51 as follows: Policy 51: Minimising Minimising - Avoiding the risks and consequences of natural hazards - consideration "When considering an application for a resource consent, notice of requirement, or a change,

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		natural hazards - consideration		inappropriate management approach, as a risk may be minimised but still be very significant.	variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised avoided , and/or in determining whether an activity is inappropriate particular regard shall be given to:"
S165.076	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	<p>Support the recognition of green infrastructure and "room for the river" options when considering resource consents, a notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures.</p> <p>However, Forest & Bird seeks:</p> <p>a. Prioritisation of green infrastructure, room for river over structural protection works or hard engineering methods;</p> <p>b. The inclusion of "nature-based solutions" as a solution in clause (b) - as this is supported by Te Mana o te Taiao Aotearoa New Zealand Biodiversity Strategy 2020 Prioritisation of these options ensures consistency with:</p> <p>a. Section 6(a) of the RMA ("the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins and the protection of them from inappropriate subdivision, use, and development");</p> <p>b. NPSFM Policy 7 and clause 2.24;</p> <p>c. NZCPS Policies 25, 26, and 27.</p> <p>Forest & Bird considers "minimise" is a low bar unsupported by higher order documents. The direction should be to "avoid the risks from natural hazards" or otherwise reinstate "reduce and do not increase".</p>	<p>Amend as follows:</p> <p>Policy 52: Minimising Avoiding adverse effects of hazard mitigation measures - consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given to: (a) the need for structural protection works or hard engineering methods;</p> <p>(b) whether prioritising non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options or nature-based solutions provide as provide as a more appropriate or suitably innovative solution;</p> <p>...</p> <p>(e) avoiding adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity;</p> <p>...</p> <p>so that they minimise-avoid avoid the risks from of natural hazards.</p>
S165.077	Chapter 4.2: Matters to	Policy 55: Providing for appropriate	Oppose	The policy is poorly drafted. There is an inconsistency with the requirement to "have particular regard to" a later requirement	Amend Policy 55 to ensure that the requirements in Policy 55(a)(ii) are required to be applied, not matters to which particular regard has to be had. Make consequential

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	be considered	urban expansion - consideration		that the Council "shall apply". The direction is either to have particular regard to the RPS provisions requiring protection of values or to apply those provisions. The matters under Policy 55(a)(ii) should to be applied not had particular regard to.	amendments to explanation.
S165.078	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support		Retain
S165.079	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	The matters under Policy 55(a)(ii) should to be applied not had particular regard to.	Amend Policy UD.2 to ensure that the requirements in Policy 55(a)(ii) are required to be applied, not matters to which particular regard has to be had.
S165.080	Chapter 4.3: Allocation of responsibilities	Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	Support		Retain
S165.081	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls	Support in part	The title of the policy suggests that it is aimed only at freshwater. However, (b) applies to 'natural wetlands', which (currently) includes coastal wetlands. Either in this or a separate policy, it should be clarified that the regional council also has responsibility for coastal wetlands. Further, some of the NES regulations (e.g.	Either amend this policy, or include in a different policy, the allocation of responsibility for natural wetlands other than freshwater ones. Clarify the policy to accurately reflect the NES regulations, which control works up to 100m from natural wetlands.

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		for freshwater		r52) apply to an area 100m from the natural wetland. It is not clear whether this is clearly captured in the policy.	
S165.082	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support		Retain
S165.083	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support		Retain
S165.084	Chapter 4.4: Non-regulatory policies	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support		Retain
S165.085	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	<p>Support this, however, request that where forests are to be used as carbon offsets, it should be a regulatory requirement to plant indigenous species rather than exotic forest.</p> <p>As such, this method will need amendment to reflect that part of its subject matter is a regulatory matter.</p>	Amend provision to address relief sought in submission.

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S165.086	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	The explanation to this policy states that it is about the efficient use of resources to reduce emissions. However, the policy appears to be broader than emissions reduction, and covers waste reduction.	Amend explanation to reflect actual intent and effect of policy.
S165.087	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part		'Nature based solutions' should be italicised.
S165.088	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support		Retain
S165.089	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part		This policy should be a regulatory policy, and have regulatory method(s) giving effect to it.
S165.090	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the manage	Support		Retain

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		nt of indigenous biodiversity - non-regulatory			
S165.091	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support		Retain
S165.092	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 1: District plan implementation	Support in part	The absence of a date means that the policies may never be implemented, if it is not reasonably practicable to do so.	Include a requirement that, in any event, the policies are implemented by the time the district plan is reviewed.
S165.093	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 2: Regional plan implementation	Support in part	The absence of a date means that the policies may never be implemented, if it is not reasonably practicable to do so.	Include a requirement that, in any event, the policies are implemented by the time the district plan is reviewed.
S165.094	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 3: Wellington Regional Land Transport Plan implementation	Support		Retain
S165.095	Chapter 4.5: Methods to implement	Method 4: Consideration - resource	Support		Retain

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	policies (regulatory methods)	consents, notices of requirement and when changing, varying or reviewing plans			
S165.096	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 5: Allocation of responsibilities	Support		Retain
S165.097	Chapter 4.5: Methods to implement policies (regulatory methods)	Method FW.1: Freshwater Action Plans	Support		Retain
S165.098	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.1: Climate change education and behaviour change programme	Support		Retain
S165.099	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.2: Develop carbon emissions offsetting guidance	Support in part	Support the development of regional guidelines for carbon offsetting. This method should specify that the guidelines must include a requirement that offsets must be achieved by the planting of indigenous vegetation.	Amend method as follows: Develop offset guidelines to assist with achieving the regional target for greenhouse emissions where reduction cannot be achieved at the source, including a requirement that offsets must be achieved by the planting of indigenous vegetation over plantation forestry.
S165.0100	Chapter 4.5: Methods to implement policies	Method CC.3: Travel demand	Support in part	As submitted above in respect of policy CC.2, travel demand management plans should not be subject to a threshold.	Amend method as follows: Where requested, the Wellington Regional Council will assist city and district councils with determining land use thresholds for triggering a Travel Demand

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	(non-regulatory methods)	management plans			Management Plan requirement, as well as guidelines for a Travel Demand Management Plan that city and district councils can provide to developers to assist them with mitigating the travel movements and associated greenhouse gas emissions arising from new subdivision, use and development
S165.0101	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.1: Partnering with mana whenua / tangata whenua to give local effect to Te Rito o te Harakeke	Support		Retain
S165.0102	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support		Retain
S165.0103	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support		Retain
S165.0104	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support		Retain

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S165.0105	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Support		Retain
S165.0106	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 17: Reducing waste and greenhouse gases emissions from waste streams	Support		Retain.
S165.0107	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Support		Retain
S165.0108	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of	Support		Retain

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		significant values			
S165.0109	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support in part	The development of the strategy should provide for engagement with stakeholders and the community.	Amend the provision as follows: Add "and engaging with stakeholders and the community" after the words "tangata whenua".
S165.0110	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 46: Develop complex development opportunities	Support in part		Add the words "and engaging with stakeholders and the community" after the words "partner approach"
S165.0111	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Support in part	Support the intent to increase permanent forest, but submit that this should be extended to include other indigenous vegetation (either in this method or in a separate method). Also, while the method is titled 'Prepare a regional forest plan', that is not specifically required by the method itself.	Amend as follows: Amend to make it clear that a regional forest spatial plan will be the outcome of this method. Using a partnership approach, create a regional forest and vegetation spatial plan, which will identify where to promote and support planting and natural regeneration of forest, wetlands and other indigenous vegetation , including how to address water quality targets for sediment, to inform the requirements of Policy CC.6.
S165.0112	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support in part	This approach should not be limited to agriculture. This method should therefore be amended.	Amend as follows: Monitor changes in agricultural land use and land management practices and review the regional policy approach by 31 December 2024, responding to any predicted changes in greenhouse gas emissions from the agricultural section in the Wellington Region and any new national policy direction.
S165.0113	Chapter 4.5:	Method CC.6:	Support		Retain

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Methods to implement policies (non-regulatory methods)	Identifying nature-based solutions for climate change			
S165.0114	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.7: Advocating for the use of transport pricing tools	Support		Retain
S165.0115	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.3: Regional biodiversity strategy	Support in part	A regional biodiversity strategy should also refer to the requirement to protect indigenous biodiversity	Add the word "protect" before the word "maintain". Amend to make this a regulatory method.
S165.0116	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Support in part		<p>Amend as follows: The regional council will liaise with the region's territorial authorities to ensure that all district plans include, as soon as possible, and in any event no later than 30 June 2025 at the latest, a schedule of indigenous ecosystems and habitats with significant indigenous biodiversity values and plan provisions to protect them from inappropriate subdivision, use and development.</p> <p>Add the words "as soon as possible, and in any event no later than" before the words "30 June 2025"</p> <p>Amend to make this a regulatory method.</p>
S165.0117	Chapter 4.5: Methods to	Method 48: Water allocation	Support in part	This method should have a realistic date by which it must be achieved.	Add a date by which this method must be achieved. Correct grammar. Amend (k) to ensure that the NPSFM is in fact given effect

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (non-regulatory methods)	policy review		Several of the paragraphs don't make grammatical sense and need amendment.	to: (k) all matters regarding giving effect to the NPS-FM are considered and implemented
S165.0118	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	The policy basis for this method (i.e. policy CC. 5) should be broader to capture other industries. As such, a similar method of support for other industries may be appropriate.	Retain. Consider including a similar method for supporting other industries to transition to low/zero carbon.
S165.0119	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Support in part	Support this method, but caution that if the identification processes under Methods IE.2 and CC.7 are not broad enough, they may not capture all areas that would benefit from restoration. The policy should therefore be broader than currently drafted. There also needs to be provision for support in the period of time up until those identification processes are complete. The reference to Method CC.7 appears to be in error. Sought deletion of method IE.2 (above) and seek deletion of the reference in this method. IE.2 is about an inventory of offsetting and compensation opportunities for consent applicants. Method CC.9 is aimed at providing funding and support for enhancement or restoration of ecosystems for their biodiversity values and/or as nature-based CC solutions. These are different approaches to offsetting and compensation, and the two concepts should not be mixed. It would be more appropriate to link this to the restoration priorities covered in the regional biodiversity strategy.	Amend method as follows: Provide support, and seek new sources of funding, for programmes that protect, enhance or restore the priority ecosystems, particularly the priority ecosystems identified by Methods IE.2 and the regional biodiversity strategy and CC.7 for their biodiversity values and/or their contribution as nature-based solutions to climate change. Also include provision in the method for support prior to the identification processes having been completed. Refer to the regional biodiversity strategy, which appears to be intended to identify restoration priorities.

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S165.0120	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support		Retain
S165.0121	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.4: Kaitiaki indigenous biodiversity monitoring	Support		Retain
S165.0122	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	Support in part	<p>Support this method, but caution that if the identification processes under Methods IE.2 and CC.6 are not broad enough, or are not carried out appropriately, they may not capture all areas that would benefit from restoration. The policy should therefore be broader than currently drafted. There also needs to be provision for restoration support in the period of time up until those identification processes are complete.</p> <p>The reference to Method CC.7 appears to be in error. We have also sought deletion of method IE.2 (above), and seek deletion of the reference in this method. IE.2 is about an inventory of offsetting and compensation opportunities for consent applicants. Method 54 is aimed at assisting mana whenua/tangata whenua and communities restoration initiatives - this is different to offsetting and compensation, and the two concepts should not be mixed. It would be more appropriate to link this to the restoration priorities covered in the regional biodiversity strategy.</p>	<p>Delete reference to IE.2. Correct reference to CC.7. Refer to the regional biodiversity strategy, which appears to be intended to identify restoration priorities.</p>
S165.0123	Chapter 4.5: Methods to implement	Method 54: Assist landowners to maintain,	Support in part	Support this method, but caution that if the identification processes under Methods IE.2 and CC.6 are not broad enough, or are not carried out appropriately, they may	Amend method to include the words "in particular those" before the words "identified by". Include provision in the method for restoration support prior to the identification processes having been

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	policies (non-regulatory methods)	enhance and restore indigenous ecosystems		not capture all areas that would benefit from restoration. The policy should therefore be broader than currently drafted. There also needs to be provision for restoration support in the period of time up until those identification processes are complete. The reference to Method CC.7 appears to be in error. We have also sought deletion of Method IE.2 (above), and seek deletion of the reference in this method. IE.2 is about an inventory of offsetting and compensation opportunities for consent applicants. Method 54 is aimed at assisting landowners with maintaining and restoring ecosystems - this is different to offsetting and compensation, and the two concepts should not be mixed. It would be more appropriate to link this to the restoration priorities covered in the regional biodiversity strategy.	completed. Correct the reference to Method CC.7 to CC.6. Delete reference to Method IE.2. Refer to the regional biodiversity strategy, which appears to be intended to identify restoration priorities.
S165.0124	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	General comments - anticipated environmental results	Support	Retain Table 14.	Retain.
S165.0125	Appendix 3: Definitions	Biodiversity compensation	Support in part	The reference to 'otherwise managed' is unclear. We also suggest, as per the submission point re policy 24, that this definition should link to a set of mandatory compensation principles contained in the RPS.	Amend definition to: A measurable positive environmental outcome resulting from actions that are designed to compensate for residual adverse biodiversity effects that cannot be avoided remedied mitigated or offset otherwise managed . Include a requirement to meet the principles set out in an appendix.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S165.0126	Appendix 3: Definitions	Biodiversity offsetting	Support in part	The reference to minimisation is unclear. Suggest, as per the submission point re policy 24, that this definition should link to a set of mandatory offsetting principles contained in the RPS.	Amend definition to: A measurable positive environmental outcome resulting from actions designed to redress for the residual adverse effects on biodiversity arising from activities after appropriate avoidance, minimisation, and remediation and mitigation measures have been applied. The goal of biodiversity offsetting is to achieve no net loss, and preferably a net gain, of indigenous biodiversity values. Include a requirement to meet the principles set out in an appendix.
S165.0127	Appendix 3: Definitions	Carbon emissions assessment	Support		Retain
S165.0128	Appendix 3: Definitions	Carbon emissions assessment	Support in part	Drafting improvement	Replace "moderate" with "reduce"
S165.0129	Appendix 3: Definitions	Climate change mitigation	Support in part	The examples are confusing	Delete examples
S165.0130	Appendix 3: Definitions	Ecological connectivity	Support in part	Drafting improvement	Replace "alleles" with "material"
S165.0131	Appendix 3: Definitions	Ecological integrity	Support in part	The definition could be improved by replacing it with one that includes more appropriate detail.	The current definition is: Delete definition and replace with: "the ability of the natural environment to support and maintain the full range of indigenous biodiversity and ecosystem functioning, both within and across ecosystems. It requires supporting and maintaining: a. ecological representation: the occurrence and extent of ecosystems and indigenous species and their habitats across the full range of environments; b.b. composition: the natural diversity and abundance of indigenous species, habitats, and communities within and across

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					ecosystems;c. structure: the biotic and abiotic physical features and characteristics of ecosystems;d. functions: the ecological and physical functions and processes of an ecosystem; ande. resilience: any other properties that contribute to resilience of the indigenous components of ecosystems to the adverse impacts of natural or human disturbances."
S165.0132	Appendix 3: Definitions	Ecosystem health	Support in part	Support the definition. However, we seek clarification on how the definition will interact with the NPSFM compulsory value of 'ecosystem health', which is described in Appendix 1A NPSFM. Policy 44 for example refers to ecosystem health in terms of freshwater takes. It is not clear how the RPS definition and the NPSFM value would apply.	Retain, but seek clarity on use of the term in freshwater provisions and make amendments as necessary. Two definitions may be needed to differentiate the terms.
S165.0133	Appendix 3: Definitions	Enhancement (in relation to indigenous biodiversity)	Support		Retain
S165.0134	Appendix 3: Definitions	Maintain /maintained /maintenance: (in relation to indigenous biodiversity)	Support in part	Defining the maintenance of biodiversity, and what it requires is critical for ensuring management actions are properly focused and are consistent across the region. There are, however, some issues with how the concept is framed in the RPS: 1. Para (c): the term "properties" is not defined. This is not clear. 2. Para (c): this para then refers to "the functions of ecosystems". We query whether a definition of ecosystem function may be needed. If one is included, we seek that it replicates the definition of 'ecosystem processes' used in the Critical factors report. [6]. [Note: 6 Walker et al, Critical factors to	This definition appears to be based on the proposed NPSIB clause 1.5 definition. We repeat the relevant parts of our submission made in relation to that term here, and seek the same relief: Amend as follows: • Insert definition of "properties of ecosystems and habitats". It is suggested that Manaaki Whenua is asked for advice on this as it prepared the Critical factors report on which the concept is based. • Consider including a definition of ecosystem function to comprise full definition from Critical factors report:[7] [Note 7 references Walker et al, Critical factors to maintain biodiversity: what effects must be avoided, remedied, or mitigated to halt biodiversity loss? LC3116, May 2018. At pg. 41 as follows] "abiotic (physical) and biotic (biological) flows that are properties of an ecosystem, including the water cycle, nutrient cycling (including decomposition, plant nutrient

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				maintain biodiversity: what effects must be avoided, remedied, or mitigated to halt biodiversity loss? LC3116, May 2018.] Strongly support the recognition that maintenance may require restoration or enhancement.	uptake, microbial respiration, nitrification, denitrification), energy flow (photosynthesis, respiration, primary production), community dynamics (including population processes such as migration, dispersal, pollination, herbivory, population dynamics, predator-prey dynamics, competition, predation, succession, source-sink dynamics), and natural selection." Amend (c) to read: "ecosystem function and the properties of ecosystems and habitats".
S165.0135	Appendix 3: Definitions	Naturally uncommon ecosystems	Support		Retain
S165.0136	Appendix 3: Definitions	Nature-based solutions	Support		Retain, but include further examples for ecosystems and species that go beyond forests and estuarine ecosystems. Alternatively, make it more clear that the examples are not exhaustive.
S165.0137	Appendix 3: Definitions	Regionally significant infrastructure	Support		Retain
S165.0138	Appendix 3: Definitions	Protect (in relation to indigenous biodiversity)	Oppose	The definition is vague and unhelpful. It starts with the words "looking after", which provides little guidance. It then refers to maintain, which is a different concept. The reference to extinction is not appropriate, as it implies that all that is sought is to ensure that species are not made extinct.	Either delete or redraft along the following lines: Ensure that biodiversity and the ecosystem processes are kept safe from harm in both the short and long term. This involves managing all threats to species and ensuring that populations are buffered from the impacts of the loss of genetic diversity and longer-term environmental events such as climate change
S165.0139	Appendix 3: Definitions	Resilience (in relation to a natural ecosystem)	Support		Retain
S165.0140	Appendix 3: Definitions	Te Mana o Te Wai	Support		Retain
S165.0141	Appendix 3: Definitions	Te Rito o te Harakeke	Support in part	This definition reflects the proposed National Policy Statement on Indigenous Biodiversity. Te Rito o te Harakeke is supported in principle. It recognises the reciprocity of the	Amend as follows: • Replace "elements" in para 3 to refer to "principles" consistent with the approach in the NPSFM. • Insert a new para underneath the principles as follows, and consistent with the approach in the NPSFM:

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				<p>human-nature relationship, rather than viewing the natural environment and social or economic outcomes as opposites to be weighed against each other. It also does this</p> <p>is a way that recognises the additional whakapapa aspect of the human-nature relationship for Māori.</p> <p>Te Rito o te Harakeke also recognises the interconnected relationship between terrestrial indigenous biodiversity and the wider environment.</p> <p>However, the way in which Te Rito o te Harakeke has been included means that it risks being interpreted to introducing a balancing of human use against maintenance of indigenous biodiversity. This was not the intention of the Biodiversity Collaborative Group. Its version of the concept was carefully drafted to put maintenance of indigenous biodiversity first, on the basis this was essential for human wellbeing of all types. The exposure NPSIB's (and therefore RPS's) balancing approach also conflicts with that</p> <p>of Te Mana o Te Wai in the NPSFM. There is no clear reason for a different approach.</p> <p>Te Mana o Te Wai expressly contains a hierarchy of obligations, with the first being the health and well-being of water bodies and freshwater ecosystems. Te Rito o Te Harakeke should include a similarly clear hierarchy of obligations, consistent with the statutory obligations underpinning the exposure NPSIB.</p>	<p>"There is a hierarchy of obligations in Te Rito o te Harakeke that prioritises:</p> <p>(a) First, te hauora o nga koiora (the health of indigenous biodiversity), recognising the connections between this and:</p> <p>(i) Te hauora o te taonga (the health of taonga); and</p> <p>(ii) Te hauora o te Taiao (the health of the wider natural environment): Second, the ability for people and communities to use natural and physical resources to provide for their social, economic, and cultural well-being, now and in the future.</p>
S165.0142	Appendix 3: Definitions	Threatened ecosystems or species	Support in part	The definition only refers to ecosystems not species. In terms of species the proper reference is the New Zealand Threat Classification System.	Amend to includes reference to species, in particular, the NZTCS with the classification of "threatened" and "at risk" declining
S165.0143	Appendix 3: Definitions	Tree canopy cover	Support		Retain

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S165.0144	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	Seek a definition for 'stationary energy' in the plan as this is not a commonly used term but a significant source of emissions so requires explanation.	Insert a new definition for 'stationary energy'.
S165.0145	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Increase targets for tree canopy cover and include provision for green infrastructure and making "room for rivers" in order to increase flood protection capacity and promote the carbon.	Amend clause (a) as follows: (a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards achieving a target of: i. 40 at least 15 percent tree canopy cover at a suburb-scale by 2030, ii. at least 30 percent cover by 2030 at the suburb scale where 15 percent cover is already in place, and 30 iii. 50 percent cover in all cases by 2050, Include the following clause: (x) providing for green infrastructure and making room for rivers
S165.0146	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support		Retain
S165.0147	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Oppose	An inventory of offsetting and compensation opportunities is not supported at the current time. Policy documents and institutional arrangements do not support such an inventory at the current time.	Delete Method IE.2 Consider replacing with a method that focusses on ecosystems that are restoration priorities for the Council, but that is not linked to offsetting and compensation, although it appears that this function is already fulfilled by the regional biodiversity strategy.
S165.0148	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting	Support in part	Threat classification for species and ecosystems change over time.	The appendix is supported but amendment is sought to be clear that Appendix 1A is not fixed in time and recognises that the threat status of species and ecosystems may change over time. If this occurs the most up to date

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		and biodiversity compensation			information should be used.
S165.0149	Appendix 3: Definitions	Restoration	Support in part	Drafting improvement	Add "or improve" after "reinstate"

S72 Rozalie Brown

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S72 Rozalie Brown					
S72.001	General comments	General comments - overall	Support in part	There is a need to show the interconnections between central government, regional government and the local bodies and various pieces of legislation.	The inclusion of a flow chart to show the weaving of the harakiki with the following acts and plans included: *SPA (strategic planning act), *CAA (Climate adaption act), *NBA (Natural Build Environment act), *NAP (Natural adaption plan), *EDAP (energy descent action plan).
S72.002	General comments	General comments - overall	Not Stated / Neutral	The removal of the word "resource" is to future proof Change 1 when RMA is fully replaced by NBA.	Remove the word "resource"

S92 Ruby Miller-Kopelov

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S92 Ruby Miller-Kopelov					
S92.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	The policy deters greenfield subdivisions that externalise environmental and infrastructure costs. There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools than TDM - provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.

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S92.002	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	The provisions throughout the RPS for Te Mana o Te Wai are supported.	Retain, refine and enhance provisions.
S92.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Creating climate-resilient urban areas is supported	Retain, refine and enhance provisions.
S92.004	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	The biodiversity provisions are supported.	Retain, refine and enhance provisions.
S92.005	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support councils ensuring that more homes doesn't mean more emissions. Support well-designed, higher-density housing. Continuing to build traffic-inducing greenfield subdivisions of single- family detached houses is simply ridiculous. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils - of all stripes - to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.

S56 Sam Gilkison

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S56 Sam Gilkison					
S56.001	Chapter 3.9: Regional form,	General comments - urban development	Oppose	We need to build more homes in places where there is land (Churton Park, Wainuiomarta, Crofton downs). Apartments are good for young adults but they are not good for raising a family. We are in a	Do not progress proposed restrictions on greenfield development.

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	design and function			housing crisis and this will make it much harder to build homes.	
S56.002	General comments	General comments - overall	Not Stated / Neutral	Cars are not the issue. Its petrol and diesel cars that are. Electric cars have zero emissions. The bus isn't for everyone. A lot of people will always drive no matter what and you can't change their minds.	Encourage people to replace petrol cars with electric cars in areas with no public transport.

S96 Sarah (Dr) Kerkin

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S96 Sarah (Dr) Kerkin					
S96.001	Appendix 3: Definitions	General comments - definitions	Support in part	I strongly recommend that GWRC consider moving the definitions to the start of the RPS. The definitions contain critical information that materially affects how the RPS will be applied. For instance, people will assume the natural and ordinary meaning of "restoration" will apply, unless they have seen the definition.	Move the definitions section to the front end of the RPS.
S96.003	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose in part	The proposed RPS contains references to the Fresh Water indicator in numerous places and whilst in some cases there is a clear linkage to NPS-FM there are many where the linkage is tenuous at best. Concerns that the criteria listed in the preamble for determining the scope of a freshwater planning instrument - namely that there should be a direct relationship to freshwater quality or quantity - have not been applied in a consistent way throughout Plan Change 1.	Remove references to the Fresh Water indicator from those parts of the document that don't meet the criteria specified in the preamble.
S96.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Oppose	Concerned about references to wrapping 'constraints' around the central government's housing intensification direction and the NPS-UD when regional policy statements are subordinate to primary legislation and national policy	Amend the proposed RPS to remove any and all clauses that seek to "constrain" the intent and direction of NPS-UD.

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				statements, and are superior to regional and district plans.	
S96.005	Chapter 3.1A: Climate change	Climate change introductory text	Oppose	<p>The reality is that significantly reducing emissions in the Wellington region is not going to have any impact on the global situation. Need to see analysis or modelling to understand the impacts on the regional economy and whether the economy and community could sustain the emission cuts needed.</p> <p>For the region and the nation to cope with the results of climate change, we need to have the strongest economy that we can generate which will give us the resilience to mitigate the inevitable consequences of changing weather patterns and sea levels. We also need to act in a nationally consistent way to make the most effective and efficient interventions that impact fairly and equitably.</p>	Remove the proposed climate change provisions pending central government direction on climate change. Alternatively, the proposed RPS should recognise the need for a strong economy and put in place measures to promote commerce and sustainable agriculture as a key elements of this.
S96.006	Chapter 3.1A: Climate change	Climate change introductory text	Oppose in part	Opening statement says that we are already locked into continued global warming until at least mid-century. However, action 1 states that methane reductions offer a significant opportunity for global cooling in the short-term. These statements appear to be contradictory.	Amend this statement to remove this contradiction and release the documents on which these statements are based so the community can understand the science.
S96.007	Chapter 3.1A: Climate change	Climate change introductory text	Oppose in part	It's not clear why GWRC thinks this is only a short-term solution. If done properly through plantation forests that are sequentially harvested, it can both lock in carbon and produce an ongoing economic benefit.	Delete the statement re short-term solution. Release the documents on which this statement is based so the community can understand the science.
S96.008	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S96.009	Chapter 3.1A:	Issue 3: The risks associated	Oppose	This statement is made from a pre-conceived point of view and does not appear to be based on evidential analysis.	Amend as follows: The risks associated with natural hazards are exacerbated

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	Climate change	with natural hazards are exacerbated by climate change		There are numerous examples of hard engineered protection works throughout the world that have given and continue to give the protection that they were designed to achieve. Thames Barrier (tidal surge), Rhine estuary at Maastricht (tidal surge and controlled river flow), Afsluitdijk (to create dry land from a 5 metre deep seawater bay). Closer to home the entire Hutt valley is protected from periodic flooding by the stop bank system and there will only be any increased risk if there is a failure to maintain them.	by climate change The hazard exposure of our communities, land, infrastructure, food (including mahinga kai), and water security is increasing because of climate change impacts on a range of natural hazards. Traditional approaches to development that have not fully considered the impacts on natural systems, and our over reliance on hard engineered protection works, which will inevitably become overwhelmed and uneconomic to sustain, will ultimately increase the risk to communities and the environment.
S96.010	Chapter 3.1A: Climate change	Issue 4: The impacts of climate change will exacerbate existing inequities	Support in part	Supports consideration of equity and fairness in the approach to managing climate change response. However, concerned about situations where peatland landowners are expected to bear the full cost of maintaining a carbon store for climate change purposes for the benefit of the wider community without recompense, which is not considered to be fair or equitable.	If the climate change provisions remain, GWRC needs to identify how it will mitigate the impacts of climate change restrictions on landowners whose land is substantially or wholly co-opted as part of a "nature based solution"
S96.011	Chapter 3.4: Fresh water (including public access)	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support in part	This policy appears to be inconsistent with the national-level Freshwater Fisheries Regulations. The RPS should not require people to do anything that will incur additional compliance costs or liability under the Regulations.	Amend Policy 10 to resolve inconsistencies with the Freshwater Fisheries Regulations.
S96.012	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	There are many situations where a change in agricultural practice will result in both an increase and a decrease in emissions. The focus should be on the net change, not just on one side of the equation.	Amend as follows: Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in gross-net greenhouse gas emissions from agriculture.
S96.013	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly	Oppose in part	Questions the evidential basis for the assertions that indigenous forest is better at sequestering carbon than exotic forest, or that permanent forest is better at carbon sequestration than, say, sustainably farmed timber forests (which could be native or exotic species). Refer to submission for more detail on reasoning.	Revisit the assertion in the policy that permanent indigenous forest gives the best overall outcome taking all factors into consideration and produce the scientific evidence for scrutiny and peer review.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		erodible land - regional plans			
S96.014	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Supports protecting Aotearoa's remaining natural wetlands, however concern about a policy that requires the restoration of all wetlands. This is because the definition of restoration is inadequately defined and requires restoration to an unspecified prior state.	Either make the restoration of wetlands a non-regulatory method; or Amend the policy so the requirement to restore only applies to natural wetlands and not to areas like the peatland that have been so degraded they have ceased to be natural wetlands.
S96.015	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	The NPS-IB hasn't yet been released following consultation on the exposure draft. The exposure draft indicated that SNA area plans would need to be notified within 5 years from the commencement date (which we won't know until the NPS-IB is promulgated). The June 2025 date will put unnecessary pressure on already overloaded local authorities to produce SNA maps that are based on criteria not yet released in the NPS-IB. That will likely impact on time for community consultation, and result in further erosion of public support for SNAs.	Withdraw policy until the NPS-IB has been released, and when the policy is ready to be notified, delete " 30 June 2025 " and replace with " within 5 years from the commencement date of NPS-IB ".
S96.016	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Not Stated / Neutral	Hierarchy is defined as a system in which people or things are put at various levels or ranks according to their importance. Policy 30 does not identify a hierarchy.	Amend as follows: Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region for which district plans must maintain and enhance...
S96.017	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	Policy 31 is an unnecessary inclusion that has the potential to cause confusion. The NPS-UD clearly specifies how Local Authority District Plans are to be amended to give effect to the NPS and Policy 31 just inserts another layer of bureaucracy in the process without really adding any value.	Delete Policy 31 from the RPS.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S96.018	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Oppose	Policy 32 repeats clear direction that is contained in NPS-UD. It is unnecessary and should be removed.	Delete Policy 32 from the RPS
S96.019	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support in part	Requests an example of a whole of life carbon assessment to assist people with their preparation. The assessment that GWRC prepared for its EV bus fleet would be an excellent example.	Insert an example of a whole of life carbon assessment (such as the EV bus fleet example) into the RPS or as part of non-regulatory guidance to assist with the preparation of such assessments.
S96.020	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	As per Policy CC.5. In focussing on gross emissions GWRC is only looking at part of the picture. There are always two sides to any equation, so net emissions is the correct measure here.	Amend as follows: When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to: (a) reducing gross net greenhouse gas emissions as a priority where practicable, and
S96.021	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the	GWRC be required to clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. GWRC be required to collaborate closely with the community in developing rules to ensure workability.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				SNA is situated as well as consultation for landowners within the buffer zone.	
S96.022	Appendix 3: Definitions	Nature-based solutions	Oppose in part	Opposes the inclusion of the reference to peatland within the definition of 'nature-based solutions' as this is contrary to the Environment Court's finding in GWRC v Adams and ors. Concerned that the reference to peatland being protected to retain carbon stores will be used as justification to limit the use of the peatland by its owners.	Remove " protecting peatland to retain carbon stores " from the definition.
S96.023	Appendix 3: Definitions	Protect (in relation to indigenous biodiversity)	Oppose in part	The definition of 'protect' is worryingly broad and vague and needs to be made more specific.	Make the components of the 'protect' definition more specific so it can be meaningfully understood and consistently applied. Consult with the community on the redrafted definition to promote its legitimacy.
S96.024	Appendix 3: Definitions	Restoration	Oppose in part	The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.	Make the components of the 'restoration' definition more specific so it can be meaningfully understood and consistently applied. Consult with the community on the redrafted definition to promote its legitimacy.
S96.025	Chapter 3.1A: Climate change	General comments - climate change	Oppose	Concerned that content in Plan Change 1 relating to climate change has been included in advance of central government direction on the issue. The council's concern is laudable, but the issue is best dealt with at a national level. Regional approaches to climate change are most likely to result in a patchwork of inconsistent requirements that will make things challenging, if not unfair, for businesses and residents. At worst, the regulatory incentives could lead to a race to the bottom.	Remove any and all clauses relating to climate change pending further regulatory instruments from central government. Release the documents used to formulate the climate policy so the science can be tested by the community.

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S105 Sharlene McDonald_Mangaroa Peatland Focus Group					
S105.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The concept of restoration is inadequately defined at the conclusion of the RPS. There is no argument against protecting that which currently exists, but the issue is taken with the concept of returning something to a loosely defined prior state.	Amend key area of action 3 to read: Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.
S105.002	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S105.003	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

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		values - consideration		<p>understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.</p> <p>To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	
S105.004	Appendix 3: Definitions	Nature-based solutions	Oppose in part	<p>GWRC must clearly state what it means by "protecting" peatland and exactly what form that protection would take. The Mangaroa peatland overlay encompasses over 75 individual landowners and not on single one has been consulted.</p>	<p>That the concept of "protecting peatland to retain carbon stores" is struck out pending thorough and extensive consultation with community and Upper Hutt City Council. Formulate simple, clear rules regarding the peatland and the implications around and compensation for any loss of use by landowners.</p>
S105.005	Appendix 3: Definitions	Restoration	Oppose in part	<p>The process of restoration as outlined in the definition is so wide sweeping that it needs to be redefined. It should not be undertaken without extensive community consultation and support. The perspective - whose desired former state is - needs to be defined, as does the time at which that former state existed. Some reference to expert opinion needs to be included. Balancing perspectives are needed from expert advisors and from people directly affected in the local community. The perspectives of people indirectly affected may also be relevant but should be given less weight than those directly affected.</p>	<p>Insert a clause requiring GWRC to engage with the community to define what restoration means for each habitat, ecosystem, landform or landscape and only proceed once they have a community approval in each case.</p>

S79 South Wairarapa District Council

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S79 South Wairarapa District Council					

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S79.001	Chapter 3.1A: Climate change	Objective CC.1	Support in part	A full and complete assessment of costs and benefits should be provided. A more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy.	Ensure the objective is supported by a more detailed assessment of benefits and costs.
S79.002	Chapter 3.1A: Climate change	Objective CC.2	Support in part	<p>The Objective is generally supported. However, it is not sufficiently robust enough to ensure that rural environments, communities, and economies are protected from inequitable allocation of the costs of avoiding, remedying or mitigating the effects of climate change.</p> <p>Any transition policies will need to create realistic and affordable alternatives for these groups (and) transition needs to recognise that options that are realistic for urban dwellers are not necessarily so for rural dwellers.</p> <p>A more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where:</p> <p>a. Reductions required by this policy is in excess of government policy; and,</p> <p>b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and,</p> <p>c. Impacts go beyond only the economic impact of carbon pricing; and,</p> <p>d. Considers the implied requirement to supplant farming activities with carbon sequestration.</p>	<p>Further amendments to the objective are required to ensure that the burden of transitioning to a low emission does not disproportionately fall on rural communities disproportionately, that reduction is preferred to mitigation, and mitigation should occur within the environment they arise as a first preference</p> <p><i>Including the following amendments to OCC.2:</i></p> <p>The costs and benefits of transitioning to a low-emission and climate-resilient region are shared fairly and equitably across the region over time, and in order to achieve social, cultural and economic well-being across our communities:(a) reduction is preferred over mitigation and;(b) that mitigation occurs as close to the source as possible.</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought.</p>
S79.003	Chapter 3.1A: Climate change	Objective CC.3	Support in part	<p>Quantification of suitable goals for reduction of climate emissions is supported. However, a more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where:</p> <p>a. Reductions required by this policy is in excess of government policy; and,</p> <p>b. That adequately assessed the impact on the social, economic and cultural</p>	<p>Amendment Sought:To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced:(a) By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels, including a:(i) 35 percent reduction from 2018 levels in land transport generated greenhouse gas</p>

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				<p>aspects of those costs on communities; and,</p> <p>c. Impacts go beyond only the economic impact of carbon pricing; and, Considers the implied requirement to supplant farming activities with carbon sequestration.</p> <p>It is unclear how the objective can possibly be achieved by the agricultural sector without substantial afforestation. Where this is the effect of the Objective this should be deleted.</p> <p>It is unclear how the quantum set are to be interpreted and applied.</p> <p>Very little can be done roads are walkable, appropriate for cycling, transport heavy to Martinborough as tourism and not viable public transport</p> <p>The objective targets net emissions. The Wellington Region Greenhouse Gas Inventory does not provide net emissions by sector; however, it does estimate net emissions by district. The results show1:</p> <ul style="list-style-type: none"> • Wairarapa accounts for 14% • Kapiti accounts for 11% • The urban whitua (Wellington, Hutt, Porirua) account for 75% of net regional emissions <p>To the extent that Council seek to set targets for net emissions by sector, it will be important to estimate net emissions for each sector, ie, both emissions and sequestration.</p> <p>Specifically: to give proper effect to this policy, Council would need to estimate the sum of farm emissions in the region plus the sum of farm sequestration in the region, to arrive at a net figure, against which progress can be tracked. If Council has that estimate available, it should be</p>	<p>emissions, and(ii) 40 percent increase in active travel and public transport mode share from 2018 levels, and(iii) 60 percent reduction in public transport emissions, from 2018 levels, and(b) By 2050, to achieve net zero emissions.</p>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<p>tabled</p> <p>Objective CC.3 intends to be more "challenging" and "cut deeper" than the national targets set in the Zero Carbon Act. The following graph illustrates the difference (the red line is the proposed RPS target)² [Note: '2' references Figure 1. Evaluation of the Preferred Regional Greenhouse Gas Reduction Target for the Wellington Region - Technical Memo, GWRC, August 2022]</p> <p>The difference is dramatic, begging the question as to costs and achievability:</p>	
S79.004	Chapter 3.1A: Climate change	Objective CC.4	Support in part	<p>The definition 'nature-based solutions' has a wide scope and will include afforestation. The particular concern from South Wairarapa about these tools is that some of them will be used disproportionately in the Wairarapa sub-region, namely carbon farming. This has the potential to displace the significant economic drivers of our communities and then the social infrastructure and communities themselves. As noted in our submission on CC.2, it is fair to require reductions and mitigations to occur 'at source' in the first instance.</p>	<p><i>[Note: Submission references prior Submission Point S79.002]</i></p> <p>No changes required if amendments to CC.2 are accepted. If relief is not accepted then the following amendments are sought:The equitable use of nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment [End of amendments to Objective CC.4] Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.</p>
S79.005	Chapter 3.1A: Climate change	Objective CC.5	Support in part	<p>The particular concern from South Wairarapa is that afforestation will be used disproportionately in the Wairarapa sub-region. This has the potential to displace the significant economic drivers of our communities and then the social</p>	<p><i>[Note: Submission references prior Submission Point S79.002]</i></p> <p>No changes required if amendments to CC.2 are accepted. If relief is not accepted, then the following amendments are sought:</p>

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				<p>infrastructure and communities themselves.</p> <p>As noted in our submission on CC.2, it is fair to require reductions and mitigations to occur 'at source' in the first instance. The objective does not provide enough clarity to adequately demonstrate that.</p>	<p>By 2030, there is an increase in the area of permanent forest in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic wellbeing where:a. emissions are not able to be first reduced and;b. afforestation is proportionate in extent to the remaining greenhouse emissions required after reduction; andc. all environments contribute to natural sequestration of carbon.</p> <p>[End of suggested amendments]</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought.</p>
S79.006	Chapter 3.1A: Climate change	Objective CC.6	Support	A long-term view is required to build in resilience to natural hazards generally as well as those exacerbated by climate change. Support the development of a multitude of regulatory and non- regulatory methods	<p>Including the following amendments to CC.6: Resource management and adaptation planning increase the resilience of communities and the natural environment to in the short, medium, and long-term effects of climate change and natural hazards.</p> <p>[End of amendments to Objective CC.6]</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought.</p>
S79.007	Chapter 3.1A: Climate change	Objective CC.7	Support	This objective is supported, but requires more support beyond policy CC.15, CC.16, and methods CC1 and CC8. These alone will not be sufficient to meet the objective's aspirations in actively participating in mitigation and adaptation responses.	<p>Retain as notified.</p> <p>Include additional policies and methods to promote the development and wider public dissemination of information outlining the effects of natural hazards and climate change.</p>
S79.008	Chapter 3.4: Fresh water	Objective 12	Support in part	The prioritisation of the health needs of people are supported. More work needs to be done to improve efficiency of use when	Retain as notified.

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	(including public access)			GWRC makes decisions allocating takes of water. Any changes in allocation requirements for municipal supplies should be phased in over the length of the approval.	
S79.009	Chapter 3.6: Indigenous ecosystems	Objective 16	Support in part	<p>Measures to protect biodiversity can be applied in the short term, or are already included in Council's regulatory documents. SWDC has protected Significant Natural Areas as part of the Combined Wairarapa District Plan for over 10 years. This is proposed to continue. However, the Objective should more appropriately reflect that it will take time to return ecosystems and habitats to a healthy functioning state.</p> <p>It is acknowledged that the often- promised National Policy Statement for Indigenous Biodiversity has not yet materialised. However, on the face of the provisions many of the matters within previous exposure drafts have been incorporated. The process managing the changes to the RPS needs to be alive if the proposed NPS does occur.</p>	<p>Amend Objective 16 as follows: Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are protected, and over time enhanced, and restored to a healthy functioning state.</p> <p>Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought, unless the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.</p>
S79.010	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support in part	<p>It is acknowledged that the often- promised National Policy Statement for Indigenous Biodiversity has not yet materialised. However, on the face of the provisions many of the matters within previous exposure drafts have been incorporated. The process managing the changes to the RPS needs to be alive if the proposed NPS does occur.</p>	<p>If the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.</p>
S79.011	Chapter 3.6: Indigenous ecosystems	Objective 16C	Support in part	<p>Where additional materials intended to be used for regulatory and non- regulatory processes are developed is appropriate and necessary that all stakeholders are included.</p>	<p>Retain as notified If the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.</p>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S79.012	Chapter 3.8: Natural hazards	Issue 3: Climate change will increase the likelihood and consequences from natural hazard events	Support in part	Not all natural hazard events, such as seismic or tsunami will increase either the likelihood or consequences as a result of climate change.	Amend to reflect that not all natural hazard events are impacted by the effects of climate change.
S79.013	Chapter 3.8: Natural hazards	Objective 19	Support in part	The Objective is particularly high level and would benefit from some nuance, addressing how new and existing risk and development are treated. This will become more relevant as the effects of climate change increase in severity and frequency and sea level rise.	Retain as notified AND; Include additional objectives and policies that give direction as to when mitigation and adaptation should be considered and the outcomes sought by that mitigation and adaptation. AND; Any consequential amendments to give effect to the relief sought.
S79.014	Chapter 3.8: Natural hazards	Objective 20	Support in part	This objective is supported. However, the framework for natural hazards overall does not give sufficient guidance for when intervention including mitigation, adaptation should be considered, including managed retreat. This is important to ensure at development and hazard management level (for example flood management) there are clear expectations around roles responsibilities.	Retain as notified AND; Include additional objectives and policies that give direction as to when mitigation and adaptation should be considered or required. AND; Any consequential amendments to give effect to the relief sought.
S79.015	Chapter 3.8: Natural hazards	Objective 21	Support	This objective is supported. However, the framework for natural hazards overall does not give sufficient guidance for when intervention including mitigation, adaptation should be considered, including managed retreat. This is important to ensure at development and hazard management level (for example flood management) there are clear expectations around roles responsibilities.	Retain as notified AND; Include additional objectives and policies that give direction as to when mitigation and adaptation should be considered or required. AND; Any consequential amendments to give effect to the relief sought.
S79.016	Chapter 3.9: Regional	Objective 22	Support in part	The objective is not clear as to how it applies to development not intended to be managed by the National Policy Statement	Amend Objective 22 as follows: Urban development, including housing and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	form, design and function			<p>for Urban Development (NPS UD).</p> <p>SWDC had previously requested direction to be able to consider these matters, but not its direct application for all of them.</p> <p>It is noted that the residential, commercial and mixed use zones of all district are considered 'urban areas' in the definitions included for this plan change. Urban development, the point of the Objective, would include development in those zones or of that type in the SWDC jurisdiction.</p> <p>Competitive land markets</p> <p>The policy appears to attempt to implement 3.8 of the NPS UD. The NPS UD specifically identifies those areas for which it is to which it is to apply. South Wairarapa District is not one of those areas.</p> <p>It is of concern that any and all urban development that meets the characteristics set out in (a) to (k) is required to be enabled.</p> <p>For small Councils with critical infrastructure issues and not required to provide urban land under the NPS UD in the same way. The proposed amendments will more likely lead to poor outcomes where planned development may be precluded in favour of unplanned development with significant long term infrastructure effects. This could be considered counter-intuitive given that some of the settlements in the SWDC jurisdiction are some of the highest housing costs in New Zealand, including Greytown which was recently identified as the second most behind only Queenstown.</p> <p>Our preference is that a more nuanced policy is provided that allows Council to</p>	<p>infrastructure in tier 1, 2 and 3 urban authorities is enabled where it demonstrates the characteristics and qualities of well functioning urban environments, which:</p> <p>(a) Are compact and well designed; and</p> <p>(b) Provide for sufficient development capacity to meet the needs of current and future generations; and</p> <p>(c) Improve the overall health, well- being and quality of life of the people of the region; and</p> <p>(d) Prioritise the protection and enhancement of the quality and quantity of freshwater; and</p> <p>(e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity can be met; and</p> <p>(f) Support the transition to a low- emission and climate-resilient region; and</p> <p>(g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and</p> <p>(h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and) Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and</p> <p>(j) Provide for commercial and industrial development in appropriate locations, including employment close to where people live; and</p> <p>i) Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and</p>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<p>better provide for development and where planned development is not undermined.</p> <p>Please provide an assessment of the costs and benefits on SWDC of applying the NPS UD in a manner over and above its statutory purpose. This should include affordability of rates for new and upgraded infrastructure and the cost of unanticipated development that meets the objective.</p> <p>It is unclear why the whole objective must go through the Freshwater Planning process.</p>	<p>(k) Are well connected through multi-modal (private vehicles, public transport, walking, micromobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space. For other territorial authorities, urban development, including housing and infrastructure are provided for where (a) to (i) and (k) are met and where it is identified as part of long term growth planning documents adopted by that Council.</p> <p>[End of amendments to Objective 22]</p> <p>Or, similar relief to the same effect;</p> <p>AND;</p> <p>Any consequential amendments to give effect to the relief sought.</p> <p>And;</p> <p>Separate out matters in the objective that are required to go through the Freshwater Planning Process from those that need not.</p>
S79.017	Chapter 3.9: Regional form, design and function	Objective 22B	Oppose	<p>The objective is so broad that it is meaningless. Further, the type of development in the rural area is that is most often not strategic in nature. The purpose of this objective is unclear, particularly when viewed against the relevant policies, and methods which are largely non-regulatory and related to water attenuation, other parts of the RPS which are already adequately covered, or thinking about matters in the future. GWRC needs to clearly identify what it is seeking to</p>	<p>Delete objective 22B</p> <p>And;</p> <p>Consult with rural communities to develop a more comprehensive, strategic and meaningful set of objectives and policies for the rural environment and introduce them by way of variation to this plan change.</p>

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				manage and why. This objective does not and can not meet any requirement of s.32 of the RMA.	
S79.018	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>It is unclear as to the degree of change that can be undertaken by the South Wairarapa District in particular that;</p> <p>a. The towns of the South Wairarapa are largely 'walkable' and 'cyclable' already for those who are able bodied;</p> <p>b. Very little regional funding for public transport is provided to the South Wairarapa;</p> <p>c. It is unclear how the large network of rural transport infrastructure in the rural environment can be amended to achieve the outcomes sought;</p> <p>d. There are limited or no alternatives provided for agricultural and forestry transport in the near future;</p> <p>e. Assumes alternatives are available for those who are aged, have limited mobility, have fixed/low incomes. Managing in this manner may be piecemeal and lead to sub-optimal outcomes. More strategic network wide assessments need to be undertaken and priorities set that was rather than imposing change on an ad-hoc basis.</p> <p>While the intent of this policy is supported, applying the requirements in (a)-(c) to all new and altered transport infrastructure does not allow for the scale or type of the alterations to be considered. For example, an alteration to transport infrastructure could comprise a new roundabout, or creation of a heavy vehicle bypass - there are many types of alterations where consideration of these matters would not be appropriate, either because the alteration is minor in nature, or because it provides greater efficiency for the wider transport network - but not necessarily for zero- or low-carbon modes.</p>	<p>Amend Policy CC.1 as follows:<i>[Note no change from Policy CC.1 shown in submission point]</i></p> <p>District and regional plans shall include objectives, policies, rules and/or methods to require that all new and altered transport infrastructure is designed, constructed, and operated in a way that contribute to reducing greenhouse gas emissions by:</p> <p>(a) Optimising overall transport demand;</p> <p>(b) Maximising mode shift from private vehicles to public transport or active modes; and</p> <p>(c) Supporting the move towards low and zero-carbon modes.</p> <p>[End of amendments to Policy CC.1]</p> <p>AND;</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought.</p>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<p>While there might be flow-on effects (e.g. a heavy vehicle bypass might make other urban streets more attractive for active modes), these would not necessarily meet the criteria in (b) and (c).</p>	
<p>S79.019</p>	<p>Chapter 4.1: Regulatory policies</p>	<p>Policy CC.2: Travel demand management plans - district plans</p>	<p>Support in part</p>	<p>It is unclear how the large network of rural transport infrastructure in the rural environment can be amended to achieve the outcomes sought.</p> <p>It is unclear on a regional scale what a 'more than minor' increase would be.</p> <p>The objective requires the support of an amended and detailed transport network assessment and strategy that sets out realistic, specific and specific implementable options for applicants to incorporate into their development.</p>	<p>Amend Policy CC. 2 as follows: By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions, regional and subregional transport strategies are developed and adopted that set out network wide, mode and location specific strategic development actions and requirements for all new subdivision, use and development to:(a) Identify appropriate thresholds for require travel demand management plan to give effect to this policy; and(b) minimise reliance on private vehicles, and;(c) maximise use of public transport and active modes, and;(d) avoid more than minor increases in greenhouse gas emissions, and;(e) require district plans are amended to include objectives, policies and rules that require subdivision, use and development consent applicants to implement the requirements in (a) to (d)</p>

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					above.
S79.020	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	The use of the policy to enable infrastructure is supported. It is unclear why this requirement does not extend to regional plans as substantial changes to transport infrastructure is likely to require a multitude of resource consent approvals.	Amend Policy CC.3 to include regional plans.
S79.021	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose in part	<p>Submission relates to Policy CC.4. The purpose of the policy is unclear. The policy refers to matters that are included for a Freshwater Planning Process, but is not of itself considered part of it. This is confusing and will complicate the hearing process. It is arguable that parts of CC.14 do not either directly or indirectly relate to freshwater matters contained in the NSP FM and therefore should be open to the standard schedule 1 process.</p> <p>While noting TA's functions in s.31 (b)(i), construction standards of buildings is a matter appropriately and adequately managed by the Building Act.</p>	<p>Amend Policy CC4 so that matters in CC.14(a) and (d) are directly referenced in the policy so that they need not be repeated in CC.14 and are within the scope of a schedule 1 hearing process.</p> <p>District and regional plans shall include policies, rules and/or non-regulatory methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments including:(a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050,(b) the application of water sensitive urban design principles to integrate natural water systems into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality(c) protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural hazards and the effects of climate change</p> <p>[End of amendments to Policy CC.4]</p>

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					Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.
S79.022	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	<p>Council recognises that equitable reductions of greenhouse emissions are required. The Wairarapa must play its part, as does the agricultural sector. However, the use of 'avoid' is unnecessary and could limit policy options when developing provisions at regional plan level. It is also unclear which only agriculture is targeted to 'avoid' increases, particularly as the emissions from the sector are generally reducing and only a small proportion of overall emissions. In respect of net emissions, the regional inventory shows that (3):</p> <p>[Note: 3 references GWRC, 18 May 2020, Wellington Region Greenhouse Gas Inventory]</p> <ul style="list-style-type: none"> • Wairarapa accounts for 14% • Kapiti accounts for 11% • The urban whaitua (Wellington, Hutt, Porirua) account for 75% of net regional emissions <p>The policy doesn't reflect the diverse and temporally variable nature of farming systems and could create a 'sinking lid' for farming in the Wairarapa Sub-Region.</p> <p>While no methods are included, and the policy applies to regional plans only, this policy appears to set the initial framework for RMA plans targeting agricultural emissions. SWDC is concerned with the implications of this, and with the interaction or conflict it might have with other agricultural emission reduction measures.</p> <p>SWDC DC wishes to understand how this reduction aligns with Government policy in</p>	Delete Policy CC.5, OR Amend Policy CC.5 as follows: Regional plans shall include objectives, policies, rules and/or methods to avoid that manage changes to land use activities and/or management practices that result in an increase, in gross greenhouse gas emissions from agriculture in order to meet the targets set out in Objective CC.3. Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.

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				<p>the area. It is unclear how fair and reasonable reductions should be calculated and consistently applied in consenting. A more fulsome assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where:</p> <ul style="list-style-type: none"> a. Reductions required by this policy is in excess of government policy; and, b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and, c. Impacts go beyond only the economic impact of carbon pricing; and, d. Considers the costs of the implied requirement to supplant farming activities with carbon sequestration. 	
S79.023	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose in part	<p>A more fulsome assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where:</p> <ul style="list-style-type: none"> a. Reductions required by this policy is in excess of government policy; and, b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and, c. Goes beyond the economic impact of carbon pricing; and, d. Considers the cost of the implied requirement to supplant farming activities with carbon sequestration. <p>The proposed approach facilitates the complete afforestation of all rural business land in the district. There is insufficient analysis of costs and benefits, particularly in the long term to the region and the South Wairarapa District. This is evident by a lack on limitations proposed. Offsetting of greenhouse gas has limitations, particularly where no controls have been put in place at source.</p>	<p>Either delete Policy CC.6, or Amend Policy CC.6 as follows:</p> <p>Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of permanent forest in the region to contribute to achieving net-greenhouse gas emissions by 2050, while:</p> <ul style="list-style-type: none"> (a) promoting and incentivising the planting or regeneration of permanent indigenous forest over exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached, and (b) avoiding plantation forestry on highly erodible land, particularly in catchments where water quality targets for sediment are not reached and (c) not enabling afforestation of permeant forest for the purposed of offsetting emissions from outside of the environment they are located (d) ensuring that any offsets are proportionate and only considered after avoidance or reductions at source have been maximised. <p>[End of amendments to Policy CC.6] Or, similar relief to the same effect; AND;</p>

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				SWDC does have concerns that the Wairarapa will be expected to provide a greater proportion of permanent forest cover than other areas because it has larger areas of rural land. When the driver for increased afforestation is achieving net zero carbon emissions, it appears inequitable that the Wairarapa might suffer from greater afforestation when there is a lack of emission reduction in other areas.	
S79.024	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	The policy intent is supported, there should be a corresponding non-regulatory method to develop guidance to integrate these solutions in infrastructure and development design options and assess when these solutions are and are not appropriate.	Retain as notified Include a non-regulatory method to develop guidance material for the application of nature based solutions included in infrastructure and development.
S79.025	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	The policy limits the need to offset costs onto rural communities in the region. Council recognises the relationship with policy CC6, and that they should be read together. However, CC.6 requires further clarification regarding proportionality and location of offsets. As such, the amendments proposed by SWDC need to remain alongside CC.8.	Retain as notified
S79.026	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally	Support in part	Retain as notified While SWDC supports the intent of this provision, the references to 'low or zero carbon' activities do not make sense here, and there are other terms that can more effectively convey the requirements of this	Amend the explanation so that it is clear what is meant by 'low and zero carbon regionally significant infrastructure'; or alternatively, remove the proposed additions to (a). Amend (a)(i) as follows: (i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to public transport, active

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		significant infrastructure - regional and district plans		policy. It is unclear what 'low and zero carbon regionally significant infrastructure' might include, and how this might be assessed. Replacing 'Low or zero carbon energy' with 'renewable energy' provides greater clarity (noting that the vast majority of residents access their energy from the National Grid or non- local sources of gas and therefore this clause has limited effect).	transport or low or zero carbon multi modal travel modes; Amend (a)(iii) as follows: (iii) people have access to energy, and preferably renewable low or zero carbon energy , so as to meet their needs; and Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.
S79.027	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	The draft South Wairarapa District Plan will align with the language in the NPS. It is unclear why the RPS sets the standard that they do.	Amend Policy 11 to align with the definition of small and community scale in the National Policy Statement for Renewable Energy Generation (NPS REG).
S79.028	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	This policy is generally supported in that the matters contained within it are best managed or directed by a Regional Authority and their functions under s.30 of the RMA. Similarly, the roles of TA's, including as owners and operators of infrastructure, ensures that the matters can be addressed as conditions attached to consents, particularly for stormwater. Council does have concerns that any required planting for open water races in an urban setting would preclude maintenance and result in overtopping or counterintuitive outcomes for water quality. Council would support the development of good practice guidelines and engineering standards to assist implementation where they are not currently available.	Retain as notified Include method that develops non- regulatory guidance on good practice to achieve the policy.

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S79.029	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose in part	<p>The policy is written in a manner that holds TA's responsible for meeting freshwater targets and limits in regional plans. this is not the function of Territorial Authorities under s.31 of the RMA to manage the use of land to achieve water quality and quantity attribute states. Similarly, this is not within the scope of 3.5(3) of the NPS which looks to 'promote positive effects' and avoid, remedy, mitigate for general health and wellbeing, not to achieve target and limits.</p> <p>TA's contributions to meeting NPS FM is adequately addressed above in the amended Policy 14 and FW.1 as part of GWRC discharge consent decisions and other regional plan matters.</p> <p>Further, much of the activities requires by the policy is managed by not only the regional plan but also the NES F. Duplication where this is required by both TA's and RC's inefficient and doesn't meet s.32.</p> <p>It is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m²).</p> <p>SWDC does not have the capacity to undertake an assessment of the matters described in this policy as they do not relate to core territorial authority functions, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks.</p> <p>Policies, rules and methods addressing these matters are more appropriate in a regional plan.</p>	Remove the requirement in Policy 15 for TA's to manage activities to achieve attribute states.
S79.030	Chapter 4.1:	Policy 17: Take and use	Support	Support the prominence of the health needs of people.	Retain as notified

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	Regulatory policies	of water for the health needs of people - regional plans			
S79.031	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support in part	This policy appropriately directs regional plans to undertake demand management directions. However, the policy as written suggests an over reduction in demand from current levels. The s.32 does not outline the need for reduction, nor adequately identifies the costs of the policy, particularly with regard to the significant growth promoted by the plan change and the existing RPS.	Amend Policy FW.1 to replace 'reduce demand' to 'increase efficiency'.
S79.032	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	The policy repeats the matters already more appropriately addressed in FW1.	Delete
S79.033	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support	It is unclear why the RPS is in this space. The policy is difficult to read and in parts does not make sense. Similarly, the provision as written may not meet the necessary requirements to be implemented.	Delete
S79.034	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	While the Wairarapa Combined District Plan has contained SNA's for at least 12 years, further assessment and ground truthing is estimated for the South Wairarapa District to cost a minimum of \$600,000. This equates to an approximately 3% increase in rates. The last two rating years has seen a 28% increase in rate, largely to provide for improved infrastructure. The work is not funded as part of the LTP and would have to go out for consultation in the 23/24 year and be completed in one financial year. This is unlikely achievable given that funds would need to be provided, field work undertaken, then plan changes complete in	Require the Greater Wellington Regional Council to fund and undertake the necessary work required to comply with the policy.

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				a 12 month period. Other substantial capital costs related to infrastructure are anticipated in that period as well. The requirement is unaffordable to the ratepayers of South Wairarapa in its current form.	
S79.035	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Support more clarity on the use of biodiversity offsetting. There is some concern in terms of the requirement of a 'minimum' 10% uplift and whether this meets the requirements of s.108AA when being applied.	Retain as notified
S79.036	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	The provisions are generally supported when examined alongside policies 51 and 52.	Retain as notified. Include additional methods to support consistent implementation of risk assessment and provision/communication of natural hazards and associated risks.
S79.037	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	Support the enabling of greater densities and height for transport oriented growth nodes in (c), including Featherston.	Retain (c) as notified.
S79.038	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key	Support	There could be improved clarity for matters such as quarries being 'industrial' and critical for growth and therefore included as part of this policy.	Improve clarity over which activities is intended to be covered by the policy.

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		industrial-based employment locations - district plans			
S79.039	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	SWDC supports the approach in principle, but are of the view that this is more achievable by the tier 1 Council's in the region that receive significant investment in public transport. SWDC still wish to support the approach to a degree that is practicable in its context. However, this may be of a significantly smaller scale than the policy intends. Matters such as the application of good urban design principles for connectivity, walkability and cyclability for able bodied residents and suitable street furniture are the most probable extents that can be applied in our context.	Amend policy CC.9 as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and development have been planned to optimise overall transport demand, maximising mode shift from private vehicles to public transport or active modes, in a way that contributes to reducing greenhouse gas emissions where practicable . Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.
S79.040	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	The policy needs to provide more certainty around whether it applies to natural features that form part of climate mitigation or those which are created. For example, existing plantation forests, or existing indigenous forest, or artificial wetlands created to mitigate the effects of climate change.	Amend Policy CC.12 as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may adversely affect a nature-based solution established mitigate the effects of to climate change and particular regard shall be given to avoiding adverse effects on the climate change mitigation or adaptation functions of that solution . [End of amendment to Policy CC.12] Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought
S79.041	Chapter 4.2: Matters to	Policy CC.13: Managing agricultural	Oppose	The policy's implementation at 'farm level' will result in a sinking lid on agricultural activities and forcing offsets of	Delete Policy CC.13 And, Establish a policy that: (a) does not result in a sinking lid to agriculture and

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	be considered	gross greenhouse gas emissions - consideration		<p>permanent forest on rural communities.</p> <p>it is not sufficiently robust enough to protect rural environments, communities, and economies from inequitable allocation of the costs of avoiding, remedying or mitigating the effects of climate change.</p> <p>A more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where:</p> <p>e. Reductions required by this policy is in excess of government policy; and,</p> <p>f. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and,</p> <p>g. Impacts go beyond only the economic impact of carbon pricing; and,</p> <p>h. Considers the implied requirement to supplant farming activities with carbon sequestration.</p>	<p>forces afforestation on rural communities,</p> <p>(b) recognises that some emissions are unavoidable, but also that constant offsetting as a result will remove agricultural uses from the land,</p> <p>(c) local food supply is necessary to reducing greenhouse gas emissions from transport.</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought</p>
S79.042	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	<p>This is a value that is included in the proposed PC1 framework that is absent in the decision making in Policy 40. This water has significant value of the community and should also be protected when considering resource consents. Policy FW.5 does not achieve this in its current form.</p>	<p>Amend Policy 40 to recognise the need for water to support human health.</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought</p>
S79.043	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose in part	<p>As noted previously, the matters in this policy directly relate to the functions in s.30(1)(ii) for regional councils.</p>	<p>Amend policy 41 to clarify that these are for regional consents only.</p>

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S79.044	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Policy FW.5 does not assist in resolving the numerous conflicts between resources within this plan change. In particular, the ability to deliver long term affordable growth, while significantly increasing environmental protections. Where growth has been planned in conjunction with the community, mana whenua and other stakeholders, the protection and enabling of municipal water takes, subject to te mana o te wai and a range of 'use management' including efficiency measures, should be protected.	Amend Policy FW.5 as follows: When considering a change, variation or review of a regional or district plan particular regard shall be given to: (a) climate change impacts on water supply, including water availability and demand; (b) demand from future population projections, growth strategies adopted by Councils, and the ability to deliver well functioning urban environments; (c) development of future water sources, storage, treatment and reticulation; and (d) protection of existing and future water sources. Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought
S79.045	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Generally SWDC support the improvements to the policy. There is concern regarding (f) in that the inclusion of the word 'may' adds unnecessary uncertainty. This should be deleted. It is critical that an additional method supporting this policy is included to address how residual risk is consistently assessed. This is more important where mitigation structures are proposed. Practical implementation of assessment of residual risk has been problematic without either hazard specific or general guidance.	Amend Policy 51 to remove the inclusion of 'may' in (f). Include a method that develops suitable guidance and methodology for persons assessing residual risk from hazard, particularly those affected by mitigation structures.
S79.046	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation	Support in part	Generally support the amendments to the policy. However, the amendments at the foot of the policy which are now to 'minimise' the risk from natural hazards creates greater uncertainty. While SWDC understands the reasoning behind it, when	Amend the changes to the footer of Policy 52 to remove the changes to include the word 'minimise' and retain the existing words 'reduce'

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		measures - consideration		undertaking protection works it is now unclear as to what standard of protection GWRC expects. For example, for flood protection work, does minimise mean for a 1%AEP event (with climate change) or does it mean a 0.1%AEP event (with climate change).	
S79.047	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support	The policy is supported, but puts too much weight on (a) over (d). This is reflected in the recently gazetted National Policy Statement for Highly Productive Soils (NPS - HPS). While SWDC seeks amendment here, we do not seek that the NPS HPS is implemented in its entirety in this process, it is particularly relevant to this policy and for growth in our district.	<p>Amend Policy 56 as follows:</p> <p>When considering an application for a resource consent or a change, variation or review of a district plan, in rural areas (as at March 2009 August 2022), particular regard shall be given to whether:</p> <p>(a) the proposal will result in a loss of productive capability of the rural area, including cumulative impacts that would reduce the potential for food and other primary production excluding land identified in (d) and reverse sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals;</p> <p>(b) the proposal will reduce aesthetic and open space values in rural areas between and around settlements;</p> <p>(c) the proposals location, design or density will minimise demand for nonrenewable energy resources; and</p> <p>(d) the proposal is consistent with any Future Development Strategy, or the city or district regional or local strategic growth and/or development framework or strategy that addresses future rural development, should the Future Development Strategy be yet to be released;</p> <p>or</p> <p>(e) in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity.</p> <p>Or, similar relief to the same effect; AND;</p>

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					Any consequential amendments to give effect to the relief sought
S79.048	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support in part	<p>CDC supports integrated development in the Eastern Growth corridor - Hutt to Masterton. However, SWDC does not consider that this policy in its proposed form is appropriate in the district outside of Featherston and potentially the proposed Woodside growth area. The public transport network in the Wairarapa is limited, and as a predominantly rural area, there are practical limits to the way in which public transport can be utilised. While active modes can be encouraged, and the rail network provides a linkage to other towns on the Wairarapa line, the heavy emphasis on public transport networks is not appropriate in the Wairarapa context.</p> <p>SWDC is concerned that the policy requires that land use and transport planning is integrated for new development and would instead support the policy seeking 'particular regard' be given to these matters in Carterton.</p> <p>Requiring this for consent applications for land use and development is also onerous and has the potential to create a significant burden in preparation and processing of consents for relatively small developments. Softening the wording will allow some discretion in when this policy should be considered.</p>	<p>Amend the policy as follows:</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, require land use and transport planning within the Wellington Region is integrated in a way which have particular regard to the way in which land use and transport planning is integrated within the Wellington Region, so that it:</p> <ul style="list-style-type: none"> (a) supports a safe, reliable, inclusive and efficient transport network; (b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity; (c) minimises private vehicle travel and trip length, where practical, while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes; (d) encourages an increase in the amount of travel made by public transport and active modes; (e) provides for well-connected, safe and accessible multi modal transport networks, where practical, while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical; (f) supports and enables the growth corridors in the Wellington Region, including: (i) Western Growth Corridor - Tawa to Levin;

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					(ii) Eastern Growth Corridor - Hutt to Masterton; (iii) Let's Get Wellington Moving Growth Corridor. Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought
S79.049	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support	Critical to ensure that environmental infrastructural objectives are met and ensures community affordability.	Retain as notified
S79.050	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Support	This method is a critical part of ensuring that the rural areas of Wairarapa do not become a carbon sink for the rest of the region.	Retain as notified
S79.051	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Support	The Wairarapa Combined District Plan already identifies and protects SNA's. However, further review and ground truthing is estimated to cost approximately \$600,000. As noted in our submission above, this equates to an approximate 3% rates increase above the already significant increases SWDC has already set. As above, the timeframe means that this work is current unfunded and would need to go through the LTP cycle. The work would have to be completed in a very short timetable assuming it could be funded. Council wishes to discuss passing this responsibility to GWRC.	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S79.052	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	The method is appropriate but it should include partnering with appropriate stakeholders.	Amend the chapeau of Policy CC.8 to include that this method is undertaken in conjunction with stakeholders.

S19 Steven Ensslen

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S19 Steven Ensslen					
S19.001	Chapter 3.9: Regional form, design and function	General comments - overall	Support	Strongly supports increasing density. There is a clear need to reduce the number of single family detached homes being built.	Retain provisions seeking to increase density.
S19.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Need to encourage people to use public transport, by improving public transport, by neighbourhood design centred around public transport, and by making transport by car more difficult.	Retain as notified
S19.003	Chapter 3.1A: Climate change	General comments - climate change	Support	Climate change has already happened and is accelerating dangerously. Support the mitigation measures in addition to the preventative measures.	Retain as notified

S155 Stride Investment Management Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S155 Stride Investment Management Limited					
S155.001	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Oppose in part	<p>Opposes the removal of Johnsonville from the definition of sub-regional centres and seeks Johnsonville Town Centre be recognised as a sub-regional centre.</p> <p>Under the Operative RPS, Johnsonville is currently appropriately recognised as both a suburban area of regional significance and a sub-regional centre. Johnsonville centre includes regionally and sub-regionally significant facilities and businesses. Johnsonville also has a number of significant community and recreational facilities that serve the sub-region.</p> <p>Consider the change will not give effect to the NPS-UD.</p>	Amend the RPS to include Johnsonville Town Centre as a sub-regional centre and any consequential changes to address the relief sought in the submission.
S155.002	General comments	General comments - overall	Oppose in part	<p>Council is required to amend the RPS to give effect to the NPS-UD and specifically the objectives and policies applying to tier 1 urban environments.</p> <p>Specifically, the requirements to amend its RPS to enable building heights and urban form to reflect demand for housing and business use in metropolitan centre zones under Policy 3 of the NPS-UD.</p> <p>However, the changes proposed under RPS Change 1 are not consistent with the recognition of metropolitan centre zones in the NPS-UD, which make it difficult for the Council to then implement Policy 3. The RPS may fail to give effect to the NPS-UD in this regard.</p> <p>Amendments are not supported as they fail to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.</p>	Amend RPS to give effect to the NPS-UD to address the relief sought in the submission.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<p>Seeks that RPS Change 1 is amended to enable an urban form in metropolitan centres that reflects the demand for housing and business use. In Johnsonville, this would reflect significant demand and intensification.</p> <p>The amendments to the RPS are disparate and are unlikely to achieve the strategic purpose of the NPS-UD, including Policy 1 of the NPS-UD to contribute to well-functioning urban environments.</p>	
S155.003	Chapter 3.1A: Climate change	Objective CC.3	Support	Supports the amendments to support a reduction in transport emissions set out in Objective CC.3.	Retain as notified.
S155.004	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	Policy 55 fails to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.	Amend Policy 55 to recognise that intensification is to be focused around major centres and rapid transit nodes, to support well functioning urban environments.
S155.005	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Oppose in part	Policy 67 fails to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.	Amend Policy 67 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S155.006	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose in part	Considers the proposed amendment to Policy 31 is not sufficient to give effect to the NPS-UD.	Amend Policy 31 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S155.007	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Oppose in part	The proposed changes will not give effect to the NPS-UD.	Amend Policy 33 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S155.008	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Oppose in part	The proposed changes will not give effect to the NPS-UD.	Amend Chapter 3.9 introduction to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S155.009	Chapter 3.9: Regional form, design and function	General comments - urban development	Oppose in part	<p>Seeks that RPS Change 1 is amended to enable an urban form in metropolitan centres that reflects the demand for housing and business use. In Johnsonville, this would reflect significant demand and intensification.</p> <p>The NPS-UD anticipates that there will be a comprehensive review of district plans and regional policy statements to ensure that they enable an urban form that gives effect to the requirements for well-functioning urban environments in the NPS-UD. RPS Change 1 does not reflect this approach. The amendments to the RPS are disparate and are unlikely to achieve the strategic purpose of the NPS-UD, including Policy 1 of the NPS-UD to contribute to well-functioning urban environments.</p>	Amend the RPS Change 1 to address the relief sought in the submission and make any consequential changes.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S155.010	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	Support the transition to a low-emission region set out in Objective 22. However, Objective 22(j) does not set out clear direction on what is 'appropriate' and 'close to where people live' could be used to support development in a wide range of locations.	Amend the provision to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S155.011	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Oppose in part	The proposed changes will not give effect to the NPS-UD.	Amend Policy 30 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S155.012	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose in part	Policy UD.3 will not give effect to the NPS-UD.	Amend Policy UD.3 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.

S119 Summerset Group Holdings Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S119 Summerset Group Holdings Limited					
S119.001	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Oppose	Policy CC.2 creates uncertainty by shifting this requirement to district plan level, leaving the potential for individual district plans to set potentially varying thresholds. There is also uncertainty created through the use of 'more than minor' and related to the ongoing monitoring and enforcement of travel demand management plans.	Delete Policy CC.2.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S119.002	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Policy CC.14 lists a range of actions that will contribute to climate resilient urban areas. Linking those to a well-functioning urban environment broadens that existing definition as set out in Policy 1 of the NPS-UD and is not required.	Amend Policy CC.4 as follows: Policy CC.4 Climate resilient urban areas - district and regional plans (FPP) District and regional plans shall include policies, rules and/or methods to provide for climate resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.
S119.003	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	Objective 22 seeks to enable urban development where it "demonstrates the characteristics and qualities of well-functioning urban environments, which" and then lists a range of matters. Each matter is linked with an 'and' thereby creating a requirement that urban development achieves each of the listed matters before the objective would consider the urban development to be enabled. Policy 1 of the NPS-UD defines a 'well-functioning urban environment'. If the objective is seeking to define a well-functioning urban environment then the definition of the NPS-UD should be the starting point. The policy has the effect of adding 11 additional aspects that would need to be addressed to consider a proposal to be a well-functioning urban environment. This is inconsistent with the intent of Policy 1 of the NPS-UD.	Amend Objective 22 as follows: <ul style="list-style-type: none"> Remove the 'and' following each listed matter; Be based on the definition of 'well-functioning urban environment' as defined in Policy 1 of the NPS-UD; and Remove superfluous matters that are otherwise addressed by the RPS or NPS-UD.
S119.004	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Policy 55 extensively adds to the definition of a well-functioning urban environment, particularly through matter (ii). Matter (ii) cross-references to other topic areas of the RPS that are otherwise relevant considerations and do not need to be included here.	Amend the policy to recognise the particular development requirements of certain development types, such as retirement villages, and by making the following changes: "When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region's urban areas (as at August 2022), particular regard shall be given to whether: (a) The urban development contributes to establishing or maintaining the qualities of a well-functioning urban environment., including: (i) the urban development will be well-connected to the existing or planned urban area, particularly if it

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					<p>is located along existing or planned transport corridors; (ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or resources identified by this RPS, including: 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29, 2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23, 3. Protecting outstanding natural features and landscape values as identified by Policy 25, 4. Protecting historic heritage values as identified by Policy 22, 5. Integrates Te Mana o Te Wai consistent with Policy 42, 6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17. 7. Recognises and provides for values of significance to mana whenua / tangata whenua, 8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and ..."</p>
S119.005	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	<p>Policy 56 lists a range of considerations for the management of development in rural areas. Matter (a) relates to impacts on productive land. This matter may well have been overtaken by the introduction of the NPS on Highly Productive Soils and could be removed pending GWRC giving effect to the NPS.</p> <p>Matter (d) requires consideration of the consistency of a development with a Future Development Strategy or other growth</p>	<p>Amend Policy 56 as follows:</p> <ul style="list-style-type: none"> • Re-considering whether matter (a) remains necessary as currently worded given the introduction of the NPS on Highly Productive Soils; • Remove duplication, or ensure consistency, between policies 55, 56 and UD.3.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<p>strategy and is reflective of Policy 55 above. Matter (e) notes that in the absence of such a strategy consideration is required of the pressure development may put on existing services and infrastructure.</p> <p>While the policy mirrors Policy 55 in terms of reflecting consideration of growth strategies, it does not similarly reflect Policy 55 in considering 'out of sequence' development. Either the policy is intending to duplicate the matters in Policy 55 with respect to growth management in which case it should mirror all relevant aspects, or matters (d) and (e) should be removed and Policy 55 and UD.3 should be relied upon.</p>	
S119.006	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Oppose in part	<p>Policy 58 is not consistent with Objective 6(c) and Policy 8 of the NPS-UD relating to being responsive to proposals that would bring about significant development capacity. It is not always possible to achieve all of the matters listed in Policy 58.</p> <p>The policy is internally inconsistent with proposed Policy 57(e) of the RPS which recognises that the timing and sequencing of land use and public transport may result in a period where public transport may not be practical.</p>	Delete Policy 58, or amend the policy to achieve consistency with Objective 6(c) and Policy 8 of the NPS-UD.
S119.007	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>Policy UD.3 lists a range of criteria which must be given particular regard when considering developments that provide for significant development capacity.</p> <p>Matter (a)(i) references the "characteristics and qualities of a well-functioning urban environment" as identified in Policy 55(a)(ii) and Objective 22. These matters have been addressed above.</p> <p>It is unclear what is meant by matter (c)(iv) of the policy and this matter should be clarified or deleted.</p>	<p>Amend Policy UD.3 as follows:</p> <ul style="list-style-type: none"> • Make consequential amendments that reflect the relief sought in respect of Objective 22 and Policy 55 outlined above; or • Deleting the words "identified in Policy 55(a)(ii) and Objective 22" from Policy UD.3(a)(i); • Delete or clarify matter (c)(iv).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S117 Sustainable Electricity Association of New Zealand (SEANZ)					
S117.001	Chapter 3.1A: Climate change	Climate change introductory text	Support	The Introduction provides good context. SEANZ specifically supports key area of action #1 as a rapid transition from fossil to renewable energy sources will not be possible without significant development of renewable electricity generation at all scales, but especially at the utility scale.	General support for this section. Specific support to retain 'key area of action' #1 - regarding the need for a rapid transition from fossil fuels to renewable energy sources. However, also need to acknowledge the national significance of renewable energy generated locally - in addition to a focus on the regional perspective.
S117.002	Appendix 3: Definitions	Regionally significant infrastructure	Support	The definition is suitable	Retain "facilities for the generation and/or transmission of electricity where it is supplied to the National grid and/or the local distribution network" as part of the definition
S117.003	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	The section 32 evaluation for "climate change and energy" refers to three options. "Option 3" has not been specifically developed but is said to be aimed at increasing "stringency of the provisions and require implementation in the medium term". The s32 evaluation identifies that "The costs of option 3 are low, however the benefits would potentially achieve the greatest benefit to society". SEANZ supports that general intent and wishes to see it properly developed as a package of provisions. SEANZ also notes that Option 3 is more consistent than the 'preferred option' with giving effect to 3.1A, Policy 7, Policy 39, Policy 11, and the "CC" policies.	The section 32 evaluation for "climate change and energy" refers to three options. "Option 3" has not been specifically developed but is said to be aimed at increasing "stringency of the provisions and require implementation in the medium term". The s32 evaluation identifies that "The costs of option 3 are low, however the benefits would potentially achieve the greatest benefit to society". SEANZ supports that general intent and wishes to see it properly developed as a package of provisions. SEANZ also notes that Option 3 is more consistent than the 'preferred option' with giving effect to 3.1A, Policy 7, Policy 39, Policy 11, and the "CC" policies.
S117.004	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support	The section 32 evaluation for "climate change and energy" refers to three options. "Option 3" has not been specifically developed but is said to be aimed at increasing "stringency of the provisions and require implementation in the medium term". The s32 evaluation identifies that "The costs of option 3 are low, however the benefits would potentially achieve the greatest benefit to society". SEANZ supports that general intent and wishes to see it properly developed as a package of	General support, but strengthen to give effect to 'Option 3' from the section 32 analysis.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				provisions. SEANZ also notes that Option 3 is more consistent than the 'preferred option' with giving effect to 3.1A, Policy 7, Policy 39, Policy 11, and the "CC" policies.	
S117.005	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	Fails to fully give effect Objective 9. The section 32 evaluation for "climate change and energy" refers to three options. "Option 3" has not been specifically developed but is said to be aimed at increasing "stringency of the provisions and require implementation in the medium term". The s32 evaluation identifies that "The costs of option 3 are low, however the benefits would potentially achieve the greatest benefit to society". SEANZ supports that general intent and wishes to see it properly developed as a package of provisions. SEANZ also notes that Option 3 is more consistent than the 'preferred option' with giving effect to 3.1A, Policy 7, Policy 39, Policy 11, and the "CC" policies.	General support, but strengthen to give effect to 'Option 3' from the section 32 analysis.
S117.006	Chapter 3.1A: Climate change	General comments - climate change	Support	The suite of "CC" policies fails to include recognition of / support for the role that renewable generation will play in reducing greenhouse gas emissions.	General support for these policies, but strengthen to give effect to 'Option 3' from the section 32 analysis.

S144 Sustainable Wairarapa Inc

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S144 Sustainable Wairarapa Inc					
S144.001	Chapter 3.1A: Climate change	Climate change introductory text	Support	Climate change is a major issue for the region (country, world) and it is important that more action is taken urgently. Agree that there is a need for integrated management of natural and built environments and mana whenua/tangata whenua involvement in decision-making needs to be improved. To date there has been an over reliance on hard infrastructure. Focusing on nature	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				based solutions in the future has widespread benefits.	
S144.002	Chapter 3.1A: Climate change	General comments - climate change	Support	Mitigation efforts have a double benefit of both reducing the severity of changes, and therefore reducing the need to adapt to those changes	Add "mitigate and" to the Summary section (p.7):
S144.003	Chapter 3.1A: Climate change	Objective CC.1	Support	Agree with all policies and methods	Retain as notified.
S144.004	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	The Methods proposed under this policy -- CC.2, CC.7 and CC.10 -- don't seem up to the task of achieving the Objective CC.3.	Retain as notified.
S144.005	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support	Combatting sprawl is key to reducing GHG emissions across all sectors.	Retain as notified.
S144.006	Chapter 3.1A: Climate change	Objective CC.4	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services , such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.
S144.007	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Allowing regeneration or planting of indigenous forest on highly erodible land will provide multiple benefits. In the Wairarapa, sedimentation and temperature increases are having the biggest impact on stream health. Increasing indigenous forest cover will provide benefits to carbon sequestration, indigenous biodiversity and freshwater health	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S144.008	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services , such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.
S144.009	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services , such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.
S144.010	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Important that knowledge of natural hazards is widespread	Retain as notified.
S144.011	Chapter 3.1A: Climate change	Objective CC.5	Support	As for Policy CC6. Changing land-use from pasture to permanent forest is an essential part of using nature-based solutions for managing freshwater. it helps to reduce sediment transport. By providing a natural store for water it reduces flood peaks and helps with flow attenuation.	Retain as notified.
S144.012	Chapter 4.5: Methods to implement	Method CC.4: Prepare a regional	Support in part	There could be a timeframe on this method eg 2025	Add a timeframe of 2025

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	t policies (non-regulatory methods)	forest spatial plan			
S144.013	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	This is excellent: "Priority should be given to promoting and incentivising the planting and regeneration of permanent indigenous forest in preference to exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached."Strongly advocate for using the appropriate species for the forest cover as benefits to regional biodiversity will be maximised if this approach is used	Retain as notified.
S144.014	Chapter 3.6: Indigenous ecosystems	Objective 16	Support	It is vital that the indigenous ecosystems and habitats of the region are maintained as our biodiversity continues to decline. It is important that somewhere in the document, the need for controlling pest animals and plants is highlighted. Ideally funding needs to be found to restore our indigenous ecosystems - if pest species are removed from remnants, these systems can bounce back.	Retain as notified.
S144.015	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support	It is vital that the indigenous ecosystems and habitats of the region are maintained as our biodiversity continues to decline. It is important that somewhere in the document, the need for controlling pest animals and plants is highlighted. Ideally funding needs to be found to restore our indigenous ecosystems - if pest species are removed from remnants, these systems can bounce back.	Retain as notified.
S144.016	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders,	Support	Partnering is very important in this space	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		landowners and the community in the identification and protection of significant values			
S144.017	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	Support	Partnering is very important in this space	Retain as notified.
S144.018	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	This support is very necessary to assisting a transition to a low emission environment	Retain as notified.
S144.019	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	This should have been completed years ago - the timeline of 2025 is useful	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S144.020	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	This should have been completed years ago - the timeline of 2025 is useful	Retain as notified.
S144.021	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services , such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.
S144.022	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	The target of 10 percent tree canopy cover at a suburb-scale is useful. Encourage indigenous cover. Also, ensure decisions are made within & by communities.	Retain as notified.
S144.023	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support	The addition points added in this policy are important ones that will aid resilience to climate change and minimise impacts on biodiversity	Retain as notified.
S144.024	Chapter 4.4: Non-	Policy IE.3: Maintaining, enhancing	Support	This is a key piece of work that needs to be completed to ensure that a difference is being made - at present biodiversity is	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	regulatory policies	and restoring indigenous ecosystem health - non-regulatory		threatened by an ongoing decline in ecosystem and habitat health.	
S144.025	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Support	Assistance is needed by care-groups and lanowners to care for indigenous ecosystems. Nature based solutions offer a wide range of benefits to be provided compared to grey/hard infrastructure.(see policy FW.7)	Retain as notified.
S144.026	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support	Indigenous ecosystems are vital to adapt to climate change and to improve biodiversity and water resilience. Assistance is needed by care-groups and lanowners to care for indigenous ecosystems	Retain as notified.
S144.027	Chapter 3.1A: Climate change	Objective CC.6	Support	Planning for resilience will reward communities by freeing up resources that will be needed to cover increased living costs due to unavoidable climatic and environmental changes.	Retain as notified.
S144.028	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	See Policy 57 regarding sprawl. Generally, containing new development will minimize exposure to natural hazards.	Retain as notified.
S144.029	Chapter 4.1:	Policy CC.4: Climate	Support	See Policy 57. Especially Method UD1: incorporate climate resilience into	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Regulatory policies	resilient urban areas - district and regional plans		development manuals and urban design guides.	
S144.030	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Change "appropriate" to "well-functioning", and change "expansion" to "growth", as to many readings "expansion" implies spatial (sprawling) growth, which is to be discouraged.	Amend the policy to read: Policy 55: Providing for appropriate well-functioning urban expansion growth - consideration
S144.031	Chapter 3.1A: Climate change	Objective CC.7	Support	Engaging people in the changes will be essential to successfully reducing emissions. Many low-cost and simple methods are available, from kerbside composting to public-facing footprinting services.	Retain as notified.
S144.032	Chapter 3.1A: Climate change	Objective CC.8	Support	Engaging people in the changes will be essential to successfully reducing emissions. Many low-cost and simple methods are available, from kerbside composting to public-facing footprinting services.	Retain as notified.
S144.033	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support		Retain as notified.
S144.034	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Support	Important to have a cohesive strategy, eg for climate change mitigation and adaptation, esp to natural hazards	Retain as notified.
S144.035	Appendix 1A	Appendix 1A: Limits to	Support	Limits are needed if the decline in biodiversity is to be halted	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		biodiversity offsetting and biodiversity compensation			
S144.036	Appendix 3: Definitions	Nature-based solutions	Support in part	Nature based solutions for water resilience are essential.	Expand to include nature-based solutions for water resilience such as farm-scale structures for slowing water down (swales, bunds, leaky dams), managing flooding to increase ground water recharge and improving the water holding capacity of soils (e.g. reducing compaction).
S144.037	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support	Needed in order to give effect to the NPS for FM	Retain as notified.
S144.038	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Needed in order to give effect to the NPS for FM	Retain as notified.
S144.039	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The net effects of large scale water storage is unlikely to help to protect and restore the ecological health of water bodies.	Amend clause (l) to read: (l) promoting the installation of public water supply or farm scale (or smaller) off-line water storage;
S144.040	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Protecting freshwater will be an essential part of using nature-based solutions for water resilience and adapting to climate change. In particular, protecting groundwater recharge areas and giving rivers more space and improving their natural character will be needed.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S144.041	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	It is unlikely that large scale water storage can give effect to Te Mana o te Wai.	Amend clause (h) Alternate water supplies such as storage or capture of rainwater should be defined to be for public water supply or at on-site farm scale or smaller.
S144.042	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	At present there is no specific work to protect of the water sources for Wairarapa towns in the Tararua Ranges within the DoC estate. DoC, iwi, GWRC and district councils should develop a working arrangement to ensure these water sources receive best practice protection.	Protection of water sources should be achieved by the combined actions of all affected councils and DoC.
S144.043	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Solutions like these need to be built at scale and support is needed to make it easier for landowners. The regions stock water races presently provide some groundwater recharge. Some races have been closed without fully investigating the effect of removing this source of recharge.	Amend clause (a) to expand the examples of nature based solutions to include more detail around flood management, to read" (a) nature based solutions including slowing water down in the landscape and increasing groundwater recharge (riparian management, wetland enhancement/restoration, flood management), giving rivers more room, allowing some temporary, shallow flooding of areas outside existing stop banks and allowing more natural character of waterways ; and
S144.044	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Built solutions should be limited to farm scale except if they are solely used for public water supply. Large scale built solutions for water storage are unlikely to give effect to Te Mana o te Wai.	Amend clause (b): (b) built solutions including storage for public water supply at community , farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds).
S144.045	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Researching and prototyping nature-based solutions will provide evidence of the benefits to landowners and encourage them to invest in these solutions.	Promote and support could be expanded to include researching and prototyping nature-based solutions.

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S144.046	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	The regions stock water races presently provide some groundwater recharge. Some races have been closed without fully investigating the effect of removing this source of recharge.	To include maintaining and enhancing the groundwater recharging capacity of the region's stock water races.
S144.047	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Existing legislation makes it difficult to build bunds because resource consents may be needed. Solutions like these need to be built at scale and support is needed to make it easier for landowners.	Add information relating to legislative change to support non-regulatory policies.
S144.048	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support in part	There are many nature-based solutions for water resilience that can be developed at a farm scale, but individual landowners have little incentive because the benefits are often downstream and they need more encouragement and proof of the benefits.	Expand to include prototyping, researching and promoting nature based solutions like swales, bunds and leaky dams.
S144.049	Chapter 4.5: Methods to implement policies (regulatory methods)	Method FW.1: Freshwater Action Plans	Support	Support the date set for these plans.	Retain as notified.
S144.050	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support	The vast majority of the public water supplies are sourced from the ranges. It is important to shield this source from natural hazards. This will require management to ensure the fabric of the ranges is maintained. Also that understanding where possible new sources may be tapped will require substantial investigation. At present there is no specific work to protect the water sources for Wairarapa towns in the Tararua Ranges within the DoC estate. DoC, iwi, GWRC and district councils should develop a working arrangement to ensure these water sources receive best practice protection.	Retain as notified.
S144.051	Chapter 4.5: Methods	Method 48: Water	Support	Support transferable permits and alternatives to first-in first-served, which	Retain as notified.

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	to implement policies (non-regulatory methods)	allocation policy review		can help improve water allocation efficiency.	
S144.053	Chapter 3.8: Natural hazards	Objective 19	Support		Retain as notified.
S144.054	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support	Important that developments are sited in areas with minimal hazards.	Retain as notified.
S144.055	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Support	identifying the new or increased hazards of climate change is very important.	Retain as notified.
S144.056	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>Important that knowledge of natural hazards is widespread.</p> <p>Clause (h): The submitter raised a question regarding how are the hazards defined as low to moderate eg for flooding, is there a specific standard for these terms.</p> <p>Clause (i): The submitter commented on "with the focus on nature based solutions it is highly likely that the creation of wetlands/bunds/low dams will be used to minimise the impact of flooding ie slowing down runoff."</p> <p>Clause (j): The submitter raised a question</p>	Retain as notified.

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				of whether the calculation has the climate change factor included.	
S144.057	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Important that knowledge of natural hazards is widespread. Nature-based solutions can provide ecosystem services. Structural protection works or hard engineering methods can damage the environment, be vulnerable to increased risks with climate change and have a shorter life. Nature-based solutions for flood control would help to improve water resilience by storing water for longer in the landscape.	To include stopbanks/flood retention structures in clause (c): (c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, regionally significant infrastructure, stopbanks/flood retention structures or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future;
S144.061	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Flood management, particularly in times of small freshes in the rivers during the summer, has potential to provide water resilience by storing water in the landscape. It could also reduce flood peaks in rivers	Provide for opportunities for increased recharge (e.g. in times when there are freshes in the rivers).

S167 Taranaki Whānui

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S167 Taranaki Whānui					
S167.001	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Not Stated / Neutral	Taranaki Whānui migrated to the Wellington area in the 1820s through to 1830s. Since then, Taranaki Whānui has maintained ahi kā (permanent occupation). Taranaki Whānui established kāinga and papakāinga around the Wellington Harbour (and other areas). The traditional kāinga, papakāinga, māra kai (gardens) mahinga kai (food gathering areas) and other sites of cultural significance have now been largely subsumed by urban development. Yet, Taranaki Whānui remain. Migration	Insertion of new statement of Taranaki Whānui Freshwater Vision and Te Mana o Te Wai Expression.

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				<p>has meant that Taranaki Whānui are now a minority within their tribal takiwā (tribal area).</p> <p>The takiwā of Taranaki Whānui extends from Turākirae, to Tāpokopoko, to Papatahi, to Orongorongo and onto Remutaka. From Remutaka, up to Pareraho, to Pōkaimangumangu, across to Pipinui, to Te Rimurapa and a direct line back to Turākirae.</p> <p>Taranaki Whānui has overlapping interests with Ngāti Toa Rangatira, Rangitāne o Wairarapa and Ngāti Kahungunu ki Wairarapa.</p> <p>As Ahi kā of the capital city of Aotearoa/ New Zealand, Taranaki Whānui's vision is to ensure that their members not only maintain their place within the takiwā but are thriving and prosperous. The loss of land and the fragmentation of Taranaki Whānui descendants and whānau (family group) over the decades creates significant challenges as they seek to restore the rightful place of their members and descendants.</p>	
S167.002	General comments	General comments - overall	Support in part	<p>We [the submitter] note the focus of RPS Change 1 is to implement and support the National Policy Statement on Urban Development 2020 (NPS-UD), and to start the implementation of the National Policy Statement for Freshwater Management 2020 (NPS-FM). RPS Change 1 also addresses issues related to climate change, indigenous biodiversity, and high natural character.</p> <p>We [the submitter] support the general policy direction of integrated management including the expectation that mana whenua / tangata whenua will be at the decision-making table. What is unclear is</p>	Details of decision sought in submission points.

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				how this will be implemented, and we make a number of specific comments in this submission to specifically address these.	
S167.003	General comments	General comments - overall	Not Stated / Neutral	We [the submitter] note the future changes of the RPS in the form of RPS2 that will approach review of the tangata whenua chapter. We signal our aspiration to be involved and engaged in that process.	Taranaki Whaanui want to be involved in any future review of the RPS tanagta whenua chapter.
S167.004	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1: Adverse impacts on natural environments and communities	Support in part	This provides for consistency across RPS1.	Amend the provision to read: 1. Adverse impacts on natural environments and communities destroying ecosystems, degrading water, adversely impacting the relationship between mana whenua / tangata whenua and the taiao, and leaving communities and nature increasingly exposed to the impacts of climate change.
S167.005	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Support in part	Strengthening these provisions with reference to Sections, 6, 7, 8 of the RMA and NPS-UD Policy 9.	Amend last sentence to read: To meet the needs of current and future populations, development will place additional pressure on the natural and built environments, and relationship of mana whenua / tangata whenua to their ancestral lands, whenua.

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	Policy Statement				
S167.006	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Support in part	Strengthening these provisions with reference to Sections, 6, 7, 8 of the RMA and NPS-UD Policy 9.	Amendment to include meeting the needs of mana whenua specifically.
S167.007	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 3: Lack of mana whenua / tangata whenua involvement in decision making	Support	Agree with description of this overarching issue.	Retain as notified.
S167.008	Chapter 3: Resource management	Overarching Objective A	Support in part	Taranaki Whānui support the principle of the overarching Objective A including that integrated management is guided by Te Ao Māori.	Insert a new clause: (a) works in partnership with mana whenua / tangata whenua.

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	issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement			Both the NPS-UD and NPS-FM bring in partnership to aspects of their implementation. By including partnership in the overarching objective, it supports this theme and empowers Taranaki Whānui as Treaty partners.	
S167.009	Chapter 3.1A: Climate change	General comments - climate change	Support in part	Support working collaboratively with iwi. Keen to see resourcing/funding for tangata whenua / mana whenua in this. Resourcing iwi to work in partnership as per Te Tiriti o Waitangi.	Retain as notified.
S167.010	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	It is important to Taranaki Whānui as Treaty partners to see acknowledgment of mana whenua and how they are affected from the outset in this new chapter. Acknowledgment of this fact and the aim to protect these sites in partnership with mana whenua, supports Taranaki Whānui as Treaty partners and sets a precedent for a flow through of partnership in this new chapter.	Include at the end of paragraph one (page 8 of RPS1): Mana whenua/tangata whenua of this region have long had concerns regarding climate change and its impacts. Despite contributing the least to greenhouse gas emissions, mana whenua/tangata whenua will bear the brunt of climate change.
S167.011	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	It is important to Taranaki Whānui as Treaty partners to see acknowledgment of mana whenua and how they are affected from the outset in this new chapter. Acknowledgment of this fact and the aim to protect these sites in partnership with mana whenua, supports Taranaki Whānui as Treaty partners and sets a precedent for a flow through of partnership in this new chapter.	Suggest adding an acknowledgment that Sites and Areas of Significance to Māori (SASMs) (including Pa sites, mahinga kai sites etc) are traditionally near the coast and therefore at higher risk of being impacted by climate change and rising sea levels.
S167.012	Chapter 3.1A: Climate change	Issue 1: Greenhouse gas emissions must be	Support in part	Climate change is disproportionately affecting Māori communities so needs urgent action. Nearly half of the greenhouse gas emissions in Aotearoa come from	Set a more aspirational target for reducing agricultural/farming emissions.

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		reduced significantly, immediately and rapidly		<p>agriculture.</p> <p>The main source of agriculture emissions is methane from livestock digestive systems. It makes up almost three quarters of our agriculture emissions.</p> <p>Taranaki Whānui supports the inclusion of this provision and this aspirational target for reducing greenhouse gas emissions.</p> <p>Would like to see a more aspirational target for reducing agricultural/farming emissions.</p>	
S167.013	Chapter 3.1A: Climate change	Issue 2: Climate change and the decline of ecosystem health and biodiversity are inseparably intertwined	Support in part	Taranaki Whānui supports the inclusion of this provision and the acknowledgement of effects on mana whenua.	Amendment to the paragraph: enable mana whenua / tangata whenua to exercise their way of being in the Te Ao Tūroa, the natural world.
S167.014	Chapter 3.1A: Climate change	Issue 3: The risks associated with natural hazards are exacerbated by climate change	Support	Taranaki Whānui supports the inclusion of this provision and the inclusion of mahinga kai reference.	Retain as notified.
S167.015	Chapter 3.1A: Climate change	Issue 4: The impacts of climate change will exacerbate existing inequities	Support in part	<p>Taranaki Whānui support the principle of this issue and the reference to inter-generational inequities.</p> <p>"Climate change poses threats and dangers to the survival of Indigenous communities worldwide, even though Indigenous peoples contribute the least to greenhouse emissions." https://www.un.org/development/desa/indigenouspeoples/climate-change.html</p>	Add an acknowledgement that Māori/iwi/hapū traditionally contribute less to greenhouse gas emissions/climate change but bear a greater burden.
S167.016	Chapter 3.1A:	Issue 5: Climate change	Support	Taranaki Whānui supports the inclusion of this provision.	Retain as notified.

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	Climate change	threatens tangible and spiritual components of Māori well-being			
S167.017	Chapter 3.1A: Climate change	Issue 6: Social inertia and competing interests need to be overcome to successfully address climate change	Support	Taranaki Whānui supports the inclusion of this provision.	Retain as notified.
S167.018	Chapter 3.1A: Climate change	Objective CC.1	Support	Taranaki Whānui supports Objective CC.1	Retain as notified.
S167.019	Chapter 3.1A: Climate change	Objective CC.2	Support	<p>Taranaki Whānui supports Objective CC.2 and in particular the equitable transition aspect.</p> <p>As noted above, Māori/iwi/hapū traditionally contribute less to greenhouse gas emissions/climate change but bear a greater burden.</p>	Retain as notified.
S167.020	Chapter 3.1A: Climate change	Objective CC.3	Support in part	<p>Taranaki Whānui supports the principle of Objective CC.3 and in particular the aspirational target for reducing greenhouse gas emissions.</p> <p>We note there is no target for reducing agricultural emissions in this objective which considering the impact of agriculture will need to be strongly addressed to meet this target.</p> <p>Given the effect of global warming on Māori/iwi/hapū, their areas of significance and indigenous biodiversity. Taranaki Whānui would like to see mana whenua and their partnership/decision-making role referenced in this objective.</p>	Retain as notified.

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				<p>Nearly half of the greenhouse gas emissions in Aotearoa come from agriculture.</p> <p>The main source of agriculture emissions is methane from livestock digestive systems. It makes up almost three quarters of our agriculture emissions.</p> <p>Mana whenua in a partnership role will help ensure Objective CC.2</p> <p>Taranaki Whānui Suggest adding strong reduction targets for agriculture in this objective.</p> <p>Taranaki Whānui Suggest urgency in the resourcing and funding of both this objective and the partnership role of mana whenua.</p>	
S167.021	Chapter 3.1A: Climate change	Objective CC.4	Support	Taranaki Whānui supports Objective CC.4	Retain as notified.
S167.022	Chapter 3.1A: Climate change	Objective CC.5	Support	Taranaki Whānui supports Objective CC.5 and notes it is intended to work with other proposed provisions in RPS1 aimed at reducing gross emissions to be most effective in supporting Objectives CC.1 and CC.3.	Retain as notified.
S167.023	Chapter 3.1A: Climate change	Objective CC.6	Support	Taranaki Whānui supports Objective CC.6	Retain as notified.
S167.024	Chapter 3.1A: Climate change	Objective CC.7	Support	Taranaki Whānui supports Objective CC.7	Retain as notified.
S167.025	Chapter 3.1A: Climate change	Objective CC.8	Support	<p>Mana whenua will need to be empowered through resourcing, funding, and capability development.</p> <p>Taranaki Whānui supports Objective CC.8, in particular the word 'empowered' and the inclusion of Policy IM.2</p> <p>Taranaki Whānui want to signal their</p>	Retain as notified.

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				intention to be involved in this decision-making.	
S167.026	Chapter 3.1A: Climate change	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support in part	Taranaki Whānui feel that as Treaty partners and bearing an over-burden of climate change, they need to be resourced, at the table and making decisions regarding climate change mitigation. Aspects of partnership are referred to in some policies and methods but there needs to be an overarching objective to ensure flow through to include giving effect to Te Mana o Te Wai.	Add an objective to work in partnership with mana whenua in tackling climate change. This should be an overarching objective and filter through all others.
S167.027	Chapter 3.3: Energy, infrastructure and waste	General comments - energy, infrastructure and waste	Oppose in part	Where is the direction for mana whenua and partnership in energy, infrastructure, and waste?	Strengthen tangata whenua's inputs in energy, infrastructure and waste related issues.
S167.028	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose in part	<p>Taranaki Whānui note the primary purpose of amendments to the Freshwater Chapter as giving effect to the National Policy Statement for Freshwater Management 2020. In Septemeber 2021, Te Mahere Wai o Te Kāhui Taiao was developed in response to the National Policy Statement for Freshwater Management 2020 and is an articulation of Te Mana o Te Wai by mana whenua.</p> <p>In general, the proposed amendments to the Regional Policy Statement have not overtly responded to Te Mahere Wai o Te Kāhui Taiao. Further work is required to give effect to this throughout the Freshwater Chapter and other freshwater related provisions of the Regional Policy Statement. This needs to include reviewing the policies and methods associated with the Freshwater objectives of the Regional Policy Statement.</p> <p>Similarly, it is unclear how the proposed amendments have responded to other key sections of the National Policy Statement for Freshwater Management 2020, namely Section 3.4 Tangata whenua involvement. Taranaki Whānui wish to work in</p>	Ensure the proposed amendments to the Regional Policy Statement, Freshwater Chapter and other freshwater related provisions, policies and methods have overtly responded to Te Mahere Wai o Te Kāhui Taiao and have responded to key sections of the National Policy Statement for Freshwater Management 2020, including Section 3.4 Tangata whenua involvement. Taranaki Whānui wish to work in partnership with Greater Wellington Regional Council to identify and address the above points and identify appropriate responses to this through this and future Plan Changes.

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				partnership with Greater Wellington Regional Council to identify and address the above points and identify appropriate responses to this through this and future Plan Changes.	
S167.029	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Oppose in part	The proposed wording does not reflect the intention of Taranaki Whānui to include a Freshwater Vision and Expression of Te Mana o Te Wai through this submission process and requires subsequent amendments. Further, the issues of significance for iwi have not been revised and do not respond to the issues outlined in Te Mahere Wai o Te Kāhui Taiao, which should be adopted as the issues of significance for Taranaki Whānui.	Include Taranaki Whānui's Freshwater Vision and Expression of Te Mana o Te Wai and revise the issues of significance for iwi outlined in Te Mahere Wai o Te Kāhui Taiao.
S167.030	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	Taranaki Whānui support the inclusion of Objective 12 as required by National Policy Statement for Freshwater Management 2020, with the following wording amendments to reflect the inclusion of a Taranaki Whānui Freshwater Vision and Expression of Te Mana o Te Wai;	Amend the objective to include Taranaki Whānui, to read: "And the Statements of Taranaki Whānui , Kahungunu ki Wairarapa, and Rangitāne o Wairarapa"
S167.031	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Not Stated / Neutral	Taranaki Whānui have provided a Freshwater Vision and Expression of Te Mana o Te Wai and is attached with this submission.	<i>[Note. Submission point refer S167.001]</i> Insertion a new provision Statement of Taranaki Whānui Te Mana o te Wai expression , draft provided in the original submission.
S167.032	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Taranaki Whānui want to signal their intention to be involved in partnership and decision-making regarding indigenous ecosystems.	Retain as notified.
S167.033	Chapter 3.6: Indigenous	Indigenous ecosystems	Support in part	Taranaki Whānui supports the reference to mahinga kai.	Taranaki Whānui want to see the acknowledgement of partnership from the outset which sets a precedent for the objectives, policies, and methods of this amended

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	s ecosystems	introductory text			chapter. Suggest adding reference to Te Rito o te Harakeke and the partnership role of mana whenua in the execution of this concept. Suggest adding text to include recognition of the intrinsic value and mauri of indigenous biodiversity as well as people's connections and relationships with it.
S167.034	Chapter 3.6: Indigenous ecosystems	Issue 1: The region's indigenous ecosystems are reduced in extent	Support	Taranaki Whānui supports the inclusion of Issue 1, in particular its reference to mahinga kai.	Retain as notified.
S167.035	Chapter 3.6: Indigenous ecosystems	Issue 2: The region's remaining ecosystems are under threat	Support in part	Taranaki Whānui support the principle of Issue 2. Remiss to not refer to damage done by agriculture.	Request that reference to the damage done to indigenous ecosystems by farming practices, in particular grazing animals/land clearance is added.
S167.036	Chapter 3.6: Indigenous ecosystems	Issue 3: Iwi and landowner values and roles are not adequately recognised and supported	Support	Taranaki Whānui supports the inclusion of Issue 3, in particular the reference to kaitiakitanga and the 'managing' of indigenous biodiversity.	Retain as notified.
S167.037	Chapter 3.6: Indigenous ecosystems	Objective 16	Support	Taranaki Whānui support the principle of Objective 16. In particular, we note the inclusion of Method 32 and 'partnering with mana whenua' and Method IE.2.	Retain as notified.
S167.038	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support in part	Taranaki Whānui support the principle of Objective 16A. We note the inclusion of Method 32 and	Include Method IE.1 under Objective 16A.

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	ecosystems			'partnering with mana whenua' and Method IE.3	
S167.039	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support in part	Taranaki Whānui support the principle of Objective 16B. It is important to note that the implementation of this objective will require adequate resourcing.	Amend the provision to read:, and mana whenua / tangata whenua are supported and resourced to exercise their kaitiakitanga for indigenous biodiversity.
S167.040	Chapter 3.6: Indigenous ecosystems	Objective 16C	Support	Taranaki Whānui support Objective 16.	Retain as notified.
S167.041	Chapter 3.6: Indigenous ecosystems	Table 6(a)	Support in part	Updated the table to include the amendments suggested by Taranaki Whānui	Updated the table to include the amendments requested to Objective 16A and 16B.
S167.042	Chapter 3.8: Natural hazards	General comments - natural hazards	Support in part		Amend chapter to include Māori names - e.g. Hutt River - Te Awa Kairangi
S167.043	Chapter 3.8: Natural hazards	Natural hazards introductory text	Support in part	Taranaki Whānui support the introductory text for Natural Hazards. We note in particular the statement the Climate change will increase the frequency and magnitude of these. Acknowledgment of impacts on mana whenua supports Taranaki Whānui as Treaty partners and sets a precedent for a flow through of partnership in this chapter.	Add description of the impacts of natural hazards on mana whenua and their areas of significance.
S167.044	Chapter 3.8: Natural hazards	Issue 1: Risks from natural hazards	Support	Taranaki Whānui support the inclusion of this provision.	Retain as notified.
S167.045	Chapter 3.8: Natural hazards	Issue 3: Climate change will increase the likelihood and consequence	Support	Taranaki Whānui support the inclusion of this provision	Retain as notified.

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		s from natural hazard events			
S167.046	Chapter 3.8: Natural hazards	Objective 19	Support	Taranaki Whānui support Objective 19. We note in particular the inclusion of Method 22	Retain as notified.
S167.047	Chapter 3.8: Natural hazards	Objective 20	Support in part	Taranaki Whānui support the principle of Objective 20. Areas of significance to mana whenua need to be provided for in this objective.	Amend the provision to read: ... and impacts on Te Mana o te Wai, Te Rito o te Harakeke, areas of significance to mana whenua , natural processes, indigenous ecosystems and biodiversity.
S167.048	Chapter 3.8: Natural hazards	Objective 21	Support	Taranaki Whānui support Objective 19. We note in particular the inclusion of Method 22	Retain as notified.
S167.049	Chapter 3.8: Natural hazards	Table 8(a)	Support in part	Taranaki Whānui want to see objectives in line with Te Tiriti o Waitangi that enable partnership in the incorporation of Te Mana o Te Wai and Te Rito of te Harakeke.	Include specific objective to partner with mana whenua in the protection of iwi/hapū against natural hazards.
S167.050	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Taranaki Whānui supports the direction of general comments and make specific comment on subsequent parts below.	Retain as notified.
S167.051	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	Cultural visibility and the expression of Taranaki Whānui as ahi kā in their areas of interest is important and needs to be articulated throughout the RPS.	Insert a sentence in paragraph 2 (p.76) Well-functioning urban environments provide for the cultural visibility of mana whenua / tangata whenua to be incorporated, integrated, and expressed through design guides and opportunities.
S167.052	Chapter 3.9: Regional form, design	Regional form, design and function introductory text	Support in part	Cultural visibility and the expression of Taranaki Whānui as ahi kā in their areas of interest is important and needs to be articulated throughout the RPS.	Amend paragraph in page 78: The region is facing growth pressure. It is important to recognise the history of impact and effects from growth and urban development

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	and function				<p>on mana whenua / tangata whenua throughout the Greater Wellington region.</p> <p>Based on the May 2022 Wellington Regional Housing and Business Development Capacity Assessment (HBA),.....</p>
S167.053	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	<p>Taranaki Whānui are Treaty partners through the Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009 and consider it necessary for NPS-UD objective 5 and policy 9 to be appropriately reflected in RPS1.</p> <p>Links to Method UD1 about urban design guidance</p>	<p>Amend the second paragraph (p.79) to reflect objective 5 and policy 9 of the NPS-UD that (objective 5) planning decisions relating to urban environments, and FDSs, take into account the principles of Te Tiriti o Waitangi and (policy 9) provisions in relation to urban environments.</p>
S167.054	Chapter 3.9: Regional form, design and function	Issue A: Lack of housing	Support in part	<p>In relation to urban environments, Taranaki Whānui support the direction of this wording on the basis that further opportunities are proffered for their involvement as required by NPS-UD: Policy 9.</p> <p>Taranaki Whānui aspires to provide housing for their own people in their areas of interest.</p>	<p>We note the three issues the NPS-UD requires the RPS to cover:</p> <ul style="list-style-type: none"> • Providing for a well-functioning and liveable urban environment • Enabling and managing urban intensification • Providing for responsive planning through introducing criteria for "adding significantly to development capacity". <p>Support the direction of this wording on the basis that further opportunities are proffered for their involvement as required by NPS-UD: Policy 9:</p> <p>Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:</p> <ul style="list-style-type: none"> (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and

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					(c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and (d) operate in a way that is consistent with iwi participation legislation.
S167.055	Chapter 3.9: Regional form, design and function	Issue B: Inappropriate development	Support in part	<p>In relation to urban environments, Taranaki Whānui support the direction of this wording on the basis that further opportunities are proffered for their involvement as required by NPS-UD: Policy 9.</p> <p>Taranaki Whānui aspires to provide housing for their own people in their areas of interest.</p>	We reference NPS-UD - Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and(c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and(d) operate in a way that is consistent with iwi participation legislation.
S167.056	Chapter 3.8: Natural hazards	Issue 1: Risks from natural hazards	Support in part	<p>Cultural visibility and the expression of Taranaki Whānui as ahi kā in their areas of interest is important and needs to be articulated throughout the RPS. Current and future urban design practices and urban development need to provide for the cultural visibility, identity, and expression for Taranaki Whānui. Amending Issue 1 will sufficiently lift the culture and identity aspirations of Taranaki Whānui.</p> <p>Taranaki Whānui are Treaty partners through the Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009 and consider it necessary for NPS-UD objective 5 and</p>	Amend the provision to read: Poor quality urban design can adversely affect public health, social equity, land values, the cultural practices, visibility, identity , and wellbeing of mana whenua / tangata whenua and communities, the vibrancy of local centres and economies, and the provision of, and access to, civic services. It can also increase the use of non-renewable resources and vehicle emissions in the region.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				policy 9 to be appropriately reflected in RPS1.	
S167.057	Chapter 3.9: Regional form, design and function	Issue 2: Sporadic, uncontrolled and/or uncoordinated development	Support	Taranaki Whānui support the inclusion of Issue 2 here and note the reference to the adverse effects on mana whenua.	Retain as notified.
S167.058	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	<p>Taranaki Whānui support the intent and direction of Objective 22 including the provision at (h) to enable Māori to express their cultural and traditional norms by providing mana whenua / tangata whenua and their relationship with their culture, land, water, sites, waahi tapu and other taonga. We support the intention to direct 'planning decisions relating to urban environments'.</p> <p>Taranaki Whānui understand from GWRC officers that the specific urban development provisions that reflect NPS-UD Objective 5 and Policy 9 are provided by Policies UD1 and UD2. What is lacking in these provisions is specific reference to respective Treaty relationships with mana whenua partners across the region. This is a concern for Taranaki Whānui as treaty partners and in relation to the proposed provisions.</p>	Objective 22 to be re-drafted in a way that reflects Treaty relationships in planning decisions relating to urban environments.
S167.059	Chapter 3.9: Regional form, design and function	Objective 22B	Oppose in part	Taranaki Whānui raised an issue around protections for potential future coastal marine permits and would like to work further in partnership on this objective.	Work in partnership with Taranaki Whānui to amend this objective.
S167.060	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust	Support	Taranaki Whānui supports the amendments to Policy 2	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and fine particulate matter, and reducing greenhouse gas emissions - regional plans			
S167.061	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>Taranaki Whānui supports the principle of new Policy CC.1 but would like to see stronger protection for lower-decile areas (including Māori).</p> <p>Lower-decile areas (including Māori) have been historically disadvantaged by the public transport system.</p> <p>Taranaki Whānui would like to partner and be involved in the decision-making of transport infrastructure planning.</p>	Insert a new sub-part which ensures a focus on equity of access
S167.062	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	Taranaki Whānui supports new Policy CC.2	Retain as notified.
S167.063	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	Taranaki Whānui supports new Policy CC.3	Retain as notified.
S167.064	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Taranaki Whānui supports the principle of new Policy CC.4 but suggests specific cross reference to Policy CC.17 to ensure alignment with mana whenua values.	Retain as notified.
S167.065	Chapter 4.1:	Policy CC.5: Avoid increases in	Support in part	We are aware that central government is taking the lead on the policy approach but given the climate crisis and the role	Amend the policy to read: Policy CC.5: Make reductions Avoid increases in

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Regulatory policies	agricultural greenhouse gas emissions - regional plan		agriculture plays, Taranaki Whānui as mana whenua feel strongly that the minimum expectation for this region should aim for reduction.	agricultural greenhouse gas emissions - regional plan
S167.066	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	Given historical land confiscations and development barriers - there needs to be a specific protection in place to prevent further disadvantage to mana whenua. Future planning in partnership with mana whenua will provide greater confidence of the implementation through regional plans.	Insert a new clause (c) to read: (c) resource and partner with mana whenua in the development of regional forest plans.
S167.067	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Taranaki Whānui supports new Policy CC.7 and notes in particular that it is informed by Method CC.6 which requires partnership with mana whenua.	Retain as notified,
S167.068	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Taranaki Whānui supports new Policy CC.8	Retain as notified.
S167.069	Chapter 4.1:	Policy 3: Protecting high natural	Support in part	Taranaki Whānui supports the amendments to Policy 3, however we would like to see regional council resource	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Regulatory policies	character in the coastal environment - district and regional plans		and partner with mana whenua in identifying and protecting areas of high natural character.	
S167.070	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Taranaki Whānui supports the amendments to Policy 7.	Retain as notified.
S167.071	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Taranaki Whānui supports the amendments to Policy 9.	Retain as notified.
S167.072	Chapter 4.1: Regulatory policies	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support		Retain as notified.
S167.073	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy	Support	Taranaki Whānui supports the amendments to Policy 11.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		efficient design and small scale renewable energy generation - district plans			
S167.074	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Taranaki Whānui supports the inclusion of this new policy. We note in particular the aim for equity and accessibility. Lower-decile areas (including Māori) have been historically disadvantaged by the public transport system.	Retain as notified.
S167.075	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support	Taranaki Whānui supports the amendments to Policy 12. We are keen to see clear statements around the resourcing/funding and capability building of mana whenua in this partnership (Method FW.1)	Retain as notified.
S167.076	Chapter 4.1: Regulatory policies	Policy 13: Allocating water - regional plans	Support		Retain as notified.
S167.077	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Taranaki Whānui supports the amendments to Policy 14.	Retain as notified.
S167.078	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and	Support	Taranaki Whānui supports the amendments to Policy 15. We note mana whenua values have been provided for and that target attribute states must be achieved.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		vegetation disturbance - district and regional plans			
S167.079	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Taranaki Whānui supports the amendments to Policy 17 noting that the first priority is given to the health and wellbeing of the waterbody.	Retain as notified.
S167.080	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Taranaki Whānui supports the amendments to Policy 18.	Retain as notified.
S167.081	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support in part	Support with amendments proposing a stronger partnership with mana whenua	Amend the policy to read: Regional plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users to the limits set in partnership with tangata whenua / mana whenua , including:
S167.082	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	Support with amendments providing a stronger partnership with mana whenua and not restricting policy direction to new infrastructure	Amend clause (a) to read: (a) provisions improving the efficiency of the end use of water on a per capita basis for new developments ; and
S167.083	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	Support with amendments providing a stronger partnership with mana whenua and not restricting policy direction to new infrastructure	Amend clause (b) to read: (b) provisions requiring alternate water supplies for non-potable use in new developments .

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S167.084	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	Support with amendments providing a stronger partnership with mana whenua and not restricting policy direction to new infrastructure	Amend the policy to read: District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users to the limits set in partnership with tangata whenua / mana whenua , including where practicable:
S167.085	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Support with stronger partnership with mana whenua. Policy should also be amended to provide for the urban development outcomes detailed within Te Mahere Wai. This also needs to provide for coastal marine permits.	Amend clause (c) to read: c) Provide for Partner with mana whenua / tangata whenua and to provide for their relationship with their culture, land, water, wāhi tapu and other taonga [Note. This submission point referenced S167.0149]
S167.086	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support in part	Financial contributions cannot be imposed against iwi authorities	Amend the Note section to read: Note: financial contributions cannot be imposed against iwi authorities , Minister of Education or Minister of Defence
S167.087	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	Taranaki Whānui support the amendment of this policy. We support the inclusion of a timeframe. Taranaki Whānui will work in partnership to identify areas outlined in (e). We note the Method 32 to implement this policy and are keen to see assurances regarding resourcing.	Retain as notified.
S167.088	Chapter 4.1:	Policy 24: Protecting indigenous	Oppose in part	Categories of offset. Appendix 1A.	Taranaki Whānui are concerned that adding a pathway for biodiversity offsetting and compensation will inherently create a pathway for further adverse impacts.

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	Regulatory policies	ecosystems and habitats with significant indigenous biodiversity values - district and regional plans			Taranaki Whānui feel strongly that mana whenua needs to partner in the development, management/regulation, and monitoring of this policy. [Note: the decision sought in this submission point cross-references to the decision sought in relation to Appendix 1A in S167.0192.]
S167.089	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	Support with stronger protections for taonga	Insert a new clause: (d) protect ecosystems and habitats that contains characteristics of special spiritual, historical or cultural significance to mana whenua / tangata whenua
S167.090	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Support with strong partnership with mana whenua. Taranaki Whānui is concerned that aspects of this policy will significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over our ancestral lands. We understand the importance of avoiding risk and are keen to work in partnership with the regional council in determining areas that in particular fall under subclause (c) and any management thereof.	Retain as notified.
S167.091	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally	Support	Taranaki Whānui supports the amendments to Policy 30.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and locally significant centres - district plans			
S167.092	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	Taranaki Whānui understands the need for intensification. We want to ensure protection of mana whenua sites and areas of significance and are keen to work with council on this.	Retain as notified.
S167.093	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support in part	Taranaki Whānui want to ensure protection of mana whenua sites and areas of significance and are keen to work with council on this.	Retain as notified.
S167.094	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	Taranaki Whānui supports the amendments to Policy 33.	Retain as notified.
S167.095	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development	Support	Taranaki Whānui notes this is a new policy focussed on providing for the occupation, use, development, and ongoing relationship of mana whenua / tangata whenua with their ancestral land. Taranaki Whānui supports the policy to	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans		<p>direct that district plans must provide for the occupation, use, development, and ongoing relationship of mana whenua / tangata whenua with their ancestral land and provides the minimum requirements in doing so.</p> <p>Enabling mana whenua / tangata whenua to exercise Tino Rangatiratanga may be achieved through District Councils working in partnership with mana whenua / tangata whenua during the plan review, change or variation process.</p> <p>Taranaki Whānui notes that Papakāinga is specifically referenced in the policy and are required to be provided for, which is consistent with Policy 1(a)(ii) of the National Policy Statement for Urban Development. Clause (d) provides the ability for identifying a Māori Purpose Zone, having the same meaning as the National Planning Standards. By way of background Taranaki Whānui has submitted on the Wellington City Council Proposed District Plan that is currently silent on Papakāinga definitions.</p>	
S167.096	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	Taranaki Whānui support policy direction.	Amend clause (d) to read: (d) making decisions based on achieving outcomes set in partnership with mana whenua / tangata whenua and using the best available information, improvements in technology and science, and mātauranga Māori; and
S167.097	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Support	Taranaki Whānui supports the new Policy IM.2 and note the development of Methods are still to come.	Retain as notified.
S167.098	Chapter 4.2: Matters to be	Policy CC.9: Reducing greenhouse gas	Support in part	Lower-decile areas (including Māori) have been historically disadvantaged by the public transport system.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	considered	emissions associated with transport infrastructure - consideration		Taranaki Whānui supports the principle of new Policy CC.9 but again would like to see stronger protection for lower-decile areas (including Māori). Suggest a sub-part which ensures a focus on equity of access or a cross reference.	
S167.099	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	Taranaki Whānui supports the principle of new Policy CC.10 but wants to see protections in place for mana whenua values.	Retain as notified.
S167.0100	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support	Taranaki Whānui supports the new Policy CC.11	Retain as notified.
S167.0101	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Taranaki Whānui supports the principle of new Policy CC.12, noting in particular that it is informed by Method CC.9 and therefore Method IE.2	Retain as notified.
S167.0102	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	We are aware that central government is taking the lead on the policy approach but given the climate crisis and the role agriculture plays, Taranaki Whānui as mana whenua feel strongly that the minimum expectation for this region should aim for reduction.	Amend policy to provide for emissions reduction: Policy CC.13: Managing Reducing agricultural gross greenhouse gas emissions - consideration

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S167.0103	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	[Note. no reason given in this submission point]	Insert a new clause, to read: (x) enabling mana whenua / tangata whenua to provide for their relationship with their culture, land, water, wāhi tapu and other taonga
S167.0104	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support	Taranaki Whānui supports the amendments to Policy 39	Retain as notified.
S167.0105	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause to read: (x) the outcomes defined within Te Mahere Wai o Te Kāhui Taiao
S167.0106	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause to read: (x) partnering with mana whenua / tangata whenua in resource management and decision making
S167.0107	Chapter 4.2:	Policy 41: Controlling	Support	Taranaki Whānui supports the amendments to Policy 41	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Matters to be considered	the effects of earthworks and vegetation disturbance - consideration			
S167.0108	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	Support with further direction for partnership in decision making	Insert a new clause: (x) partnering with mana whenua / tangata whenua in resource management and decision making
S167.0109	Chapter 4.2: Matters to be considered	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Taranaki Whānui supports the deletion of this policy	Retain as notified.
S167.0110	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause: (x) the outcomes defined within Te Mahere Wai o Te Kāhui Taiao are achieved
S167.0111	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause: (x) mana whenua / tangata whenua are partner in resource management and decision making.
S167.0112	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and	Support	Taranaki Whānui supports the new Policy FW.5	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	considered	urban development - consideration			
S167.0113	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	Support with further promotion of mana whenua protections in consideration	Insert a new clause: (x) protecting the relationship between mana whenua / tangata whenua and their culture, land, water, wāhi tapu and other taonga
S167.0114	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support in part	Support with further direction for partnership in decision making	Insert a new clause: (x) partnering with mana whenua / tangata whenua in resource management and decision making
S167.0115	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Given historical land confiscations and development barriers - there needs to be a specific protection in place to prevent further disadvantage to mana whenua. Taranaki Whānui supports the amendments to Policy 51 but want to see specific protections for Māori owned land.	Retain as notified.
S167.0116	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Taranaki Whānui supports the amendments to Policy 52.	Retain as notified.
S167.0117	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban	Support	Taranaki Whānui supports the amendments to Policy 55.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	considered	expansion - consideration			
S167.0118	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	Taranaki Whānui request amendment to be made.	Insert a new clause: (x) the proposal will affect cultural values in rural areas between and around settlements.
S167.0119	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support in part	Lower-decile areas (including Māori) have been historically disadvantaged by the public transport system. Focus needs to be on equity.	Insert a new clause: (x) supports an equitable transport network
S167.0120	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support	Taranaki Whānui supports the amendments to Policy 58.	Retain as notified.
S167.0121	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support in part	Taranaki Whānui supports the principle of this new policy.	We seek further clarification/amendment that protects against proposed developments on land surrounding marae/urupā and other sites.
S167.0122	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support	We note the new policy provides for responsive planning as required by the NPS-UD by introducing criteria for considering developments that add significantly to development capacity.	Retain as notified.
S167.0123	Chapter 4.3: Allocation of responsibilities	Policy 61: Allocation of responsibilities for land use controls for	Support	Taranaki Whānui supports the amendments to Policy 61	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		indigenous biodiversity			
S167.0124	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support	Taranaki Whānui supports Policy FW.6	Retain as notified.
S167.0125	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	<p>We (Taranaki Whānui) are aware that central government is taking the lead on the policy approach but given the climate crisis and the role agriculture plays, Taranaki Whānui as mana whenua feel strongly that the minimum expectation for this region should aim for reduction.</p> <p>Taranaki Whānui supports the new Policy CC.15. In particular the promotion and support of gross greenhouse gas emission reduction.</p>	Retain as notified.
S167.0126	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support	Taranaki Whānui supports the new Policy CC.16	Retain as notified.
S167.0127	Chapter 4.4: Non-regulatory policies	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support in part	<p>The success of this policy will rest on implementation and ability of Councils to work with iwi.</p> <p>Taranaki Whānui supports the principle of new Policy CC.17.</p> <p>Taranaki Whānui recommend this policy is updated to reflect opportunities to be involved in long-term planning process.</p> <p>Taranaki Whānui would like to ensure the</p>	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				funding of these plans and see them as part of the long-term planning process.	
S167.0128	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	<p>Given historical land confiscations and development barriers - there needs to be a specific protection in place to prevent further disadvantage to mana whenua.</p> <p>Future planning in partnership with mana whenua will provide greater confidence that the of implementation through regional plans.</p> <p>Taranaki Whānui supports the principle of new Policy CC.18 but would like to see firm protections for mana whenua in both resourcing and partnering in the development of regional forest plans.</p>	Retain as notified.
S167.0129	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	<p>Taranaki Whānui supports the amendments to Policy 65.</p> <p>Taranaki Whānui want to signal their intention to be involved in partnership and decision-making regarding waste management.</p>	Retain as notified.
S167.0130	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Taranaki Whānui supports Policy FW.7	Retain as notified.
S167.0131	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support	Taranaki Whānui supports Policy FW.8.	Retain as notified.
S167.0132	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem	Support in part	Taranaki Whānui supports the principle of Policy IE.3 but wants to see clearer reference to partnership with and the resourcing of mana whenua.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		health - non-regulatory			
S167.0133	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support in part	Taranaki Whānui supports the principle of Policy IE.4 and feel mana whenua as Treaty partners also have role in this policy and this should be referred to and enabled.	Retain as notified.
S167.0134	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Taranaki Whānui supports the amendments to Policy 67. We note subclause (d) and (f) and are keen to work in partnership with council on this.	Retain as notified.
S167.0135	Chapter 4.5: Methods to implement policies (regulatory methods)	General comments - regulatory methods	Support in part	Taranaki Whānui seek clearer understanding of the Implementation Plan. See Chapter 5 comments - we are seeking that mana whenua are resourced to partner in the setting of AERs, monitoring/State of Environment report and reviewing/developing and executing the Implementation Plan.	Details of decision sought in submission points in particular related to Chapter 5.
S167.0136	Chapter 4.5: Methods to implement policies (regulatory	Method 1: District plan implementation	Support	Taranaki Whānui supports this method and in particular the requirement for district plans to be amended 'as soon as reasonably practicable' so as to begin the implementation of much needed environmental protections.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	y methods)				
S167.0137	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 2: Regional plan implementation	Support	Taranaki Whānui supports this method and in particular the requirement for regional plans to be amended 'as soon as reasonably practicable' so as to begin the implementation of much needed environmental protections.	Retain as notified.
S167.0138	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 3: Wellington Regional Land Transport Plan implementation	Oppose in part	<p>Taranaki Whānui support the intent and direction of Objective 22 including the provision at (h) to enable Māori to express their cultural and traditional norms by providing mana whenua / tangata whenua and their relationship with their culture, land, water, sites, waahi tapu and other taonga. We support the intention to direct 'planning decisions relating to urban environments'.</p> <p>Taranaki Whānui understand from GWRC officers that the specific urban development provisions that reflect NPS-UD Objective 5 and Policy 9 are provided by Policies UD1 and UD2. What is lacking in these provisions is specific reference to respective Treaty relationships with mana whenua partners across the region. This is a concern for Taranaki Whānui as treaty partners and in relation to the proposed provisions.</p> <p>Taranaki Whānui note new policy EIW.1 focusses on providing direction to the Regional Land Transport Plan and by order of hierarchy (including Objective 22) mana whenua / tangata whenua involvement will be required. It is not explicit for treaty partners. As with decision sought on Objective 22, we require explicit direction for treaty partner involvement.</p>	Re-draft Method 3
S167.0139	Chapter 4.5:	Method 4: Consideratio	Support	Taranaki Whānui supports the inclusion of this method.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Methods to implement policies (regulatory methods)	n - resource consents, notices of requirement and when changing, varying or reviewing plans			
S167.0140	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 5: Allocation of responsibilities	Support	Taranaki Whānui notes the intent of Policy FW.6 outlining the allocation of responsibilities for land use and development controls for freshwater between Wellington Regional Council and territorial authorities. We have provided a draft Freshwater Vision and Te Mana o te Wai statement that will explicitly assist in establishing the policy framework for Taranaki Whānui involvement in through the freshwater planning instrument and therefore implementation.	Retain as notified.
S167.0141	Chapter 4.5: Methods to implement policies (regulatory methods)	Method FW.1: Freshwater Action Plans	Support in part	Taranaki Whānui support the inclusion of this method. Taranaki Whānui would like to see clear statements on the resourcing/funding and capability building of mana whenua partners included in the description.	Retain as notified.
S167.0142	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.1: Climate change education and behaviour change programme	Support in part	Taranaki Whānui support the inclusion of this method. Taranaki Whānui would like to see clear statements on the resourcing/funding and capability building of mana whenua partners included in the description.	Retain as notified.
S167.0143	Chapter 4.5: Methods to implement	Method CC.2: Develop carbon emissions	Support in part	Taranaki Whānui support the inclusion of this method. Taranaki Whānui would like to see these	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	t policies (non-regulatory methods)	offsetting guidance		guidelines developed in partnership with mana whenua.	
S167.0144	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.3: Travel demand management plans	Support	Taranaki Whānui support the inclusion of this method.	Retain as notified.
S167.0145	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.1: Partnering with mana whenua / tangata whenua to give local effect to Te Rito o te Harakeke	Support in part	Taranaki Whānui support the inclusion of this method. In particular we note and support the requirement to work in partnership with mana whenua. Taranaki Whānui would like to see clear statements on the resourcing/funding and capability building of mana whenua partners included in the description.	Retain as notified.
S167.0146	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support	Taranaki Whānui support the inclusion of this method and seek to partner with the regional council in this research, planning and decision-making process.	Retain as notified.
S167.0147	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 23: Information about natural features to protect property from natural hazards	Support	[Note. No reason given in this submission point.]	Retain as notified.
S167.0148	Chapter 4.5: Methods to	Method 25: Information about the provision of	Support	[Note. No reason given in this submission point]	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (non-regulatory methods)	walking, cycling and public transport for development			
S167.0149	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support	Taranaki Whānui notes the insertion of new Method UD.1: Development manuals and design guides. The premise of integrated management outlines the notion to work together. With respect to mana whenua / tangata whenua there is an expectation that this will result in partnership opportunities. At present the new Method UD.1 ring-fences mana whenua / tangata whenua involvement to 'Papakāinga design guidance' at (b). This is insufficient to represent the aspirations Taranaki Whānui has in relation to urban development over our areas of interest.	Amend the policy to read: Prepare the following development manuals and design guidance with mana whenua / tangata where practicable :
S167.0150	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support	Taranaki Whānui supports Method IM.1	Retain as notified.
S167.0151	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.2: Protection and interpretation of Mātauranga Māori and Māori data	Support	Taranaki Whānui supports Method IM.2. Taranaki Whānui want to indicate our intention to partner with council on this important mahi. Taranaki Whānui are keen to see assurances in regard to resourcing/funding and capability building.	Retain as notified.
S167.0152	Chapter 4.5: Methods to implement policies (non-	Method FW.2: Joint processing urban development consents	Support in part	Taranaki Whānui note the new method is focused on joint processing of resource consents for urban development. At (b) is the provision to 'encourage resource consent applicants to engage with mana whenua / tangata whenua. Taranaki Whānui require a discussion as to the	Amend clause (b) to read: (b) encourage require resource consent applicants to engage with mana whenua / tangata whenua early in their planning

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	regulatory methods)			<p>impacts of replacing the word encourage with require.</p> <p>Taranaki Whānui can't fully appreciate the impact without a further discussion with officers.</p>	
S167.0153	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 17: Reducing waste and greenhouse gases emissions from waste streams	Support	<p>Taranaki Whānui support the inclusion of this method. In particular we note and support the requirement to work in partnership with mana whenua.</p> <p>Taranaki Whānui would like to see clear statements on the resourcing/funding and capability building of mana whenua partners included in the description.</p>	Retain as notified.
S167.0154	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Support in part	<p>Amended Method 22 is usefully updated. To ensure integrated hazard risk management and climate change adaptation planning in the Wellington region is successfully implemented will be based on the ability to partner with mana whenua / tangata whenua. Taranaki Whānui recommend stronger wording to reflect this.</p> <p>For example, new Method 32 provides for language around 'partnering' so this method could similarly reference that direction.</p> <p>[Note. the submitter would like to note that] Taranaki Whānui currently have applications (in progress) for coastal marine permit applications and have sought specific advice from GWRC officers. At the writing of this submission, there are no clear protections for mana whenua / tangata whenua holding coastal permits and where relevant triggers are located. Further advice has been sought from GWRC officers.</p>	Amend clause (c) to read: (c) partner where practicable assisting with mana whenua / tangata whenua in the development of iwi climate change adaptation plans.
S167.0155	Chapter 4.5: Methods to	Method 31: Protocol for management of earthworks	Support	Taranaki Whānui notes the deletion of Method 31 and new 'Amended Method 32' to reflect partnering with mana whenua /	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (non-regulatory methods)	and air quality between local authorities		tangata whenua in the identification and protection of significant values.	
S167.0156	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support	<p>Taranaki Whānui support the inclusion of this method and in particular note the requirement to partner with mana whenua.</p> <p>Taranaki Whānui want to indicate our intention to partner with council in these processes. We are keen to see assurances regarding the resourcing/funding and capability building of mana whenua in this work.</p>	Retain as notified.
S167.0157	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 33: Identify sustainable energy programmes	Support	Deleted method	Retain as notified.
S167.0158	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support	<p>Taranaki Whānui support the inclusion of this method and in particular note the requirement to partner with mana whenua.</p> <p>Taranaki Whānui want to indicate our intention to partner with council in the development of this strategy.</p>	Retain as notified.
S167.0159	Chapter 4.5: Methods to	Method 35: Prepare a regional	Not Stated / Neutral		Deleted method

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (non-regulatory methods)	stormwater action plan			
S167.0160	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 40: Sign the New Zealand Urban Design Protocol	Support	Deleted method	Retain as notified.
S167.0161	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 41: Integrate public open space	Support	Deleted method	Retain as notified.
S167.0162	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 42: Develop visions for the regionally significant centres	Support	Deleted method	Retain as notified.
S167.0163	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 43: Develop principles for retail activities	Support	Deleted method	Retain as notified.
S167.0164	Chapter 4.5: Methods to	Method 44: Analysis of industrial	Support	Deleted method	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (non-regulatory methods)	employment locations			
S167.0165	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 45: Develop principles for rural-residential use and development	Support	Deleted method	Retain as notified.
S167.0166	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 47: Analysis of the range and affordability of housing in the region	Support	Deleted method	Retain as notified.
S167.0167	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Support in part	Taranaki Whānui to partner in the development of the FDS.	Retain as notified.
S167.0168	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Support in part	<p>Given historical land confiscations and development barriers - there needs to be a specific protection in place to prevent further disadvantage to mana whenua.</p> <p>Future planning in partnership with mana whenua will provide greater confidence of the implementation through regional plans.</p> <p>Taranaki Whānui support the principle of this method. As per our comments on Policy CC.6, we would like to see firm protections in place for mana whenua. The</p>	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<p>'partnership approach' needs to clearly state it is with mana whenua, who need to be resourced for this.</p> <p>Taranaki Whānui want to indicate their intention to work in partnership with councils to prepare these spatial plans.</p>	
S167.0169	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	<p>Taranaki Whānui are aware that central government is taking the lead on the policy approach.</p> <p>Taranaki Whānui support the need for monitoring and review - and reducing the damage done by agriculture.</p> <p>Taranaki Whānui want to signal our support for stronger direction on agricultural emission reduction.</p>	Retain as notified.
S167.0170	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.6: Identifying nature-based solutions for climate change	Support	<p>Taranaki Whānui support the inclusion of this method and in particular note the requirement to partner with mana whenua.</p> <p>Taranaki Whānui want to indicate our intention to partner with council in this process.</p>	Retain as notified.
S167.0171	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.7: Advocating for the use of transport pricing tools	Support in part	<p>Lower-decile areas (including Māori) have been historically disadvantaged by the public transport system.</p> <p>Taranaki Whānui supports the principle of this new method but would like to see stronger protection for lower-decile areas (including Māori). Other than reducing emissions, there needs to be a focus on equity of access to transport.</p>	Retain as notified.
S167.0172	Chapter 4.5: Methods to implement policies (non-	Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Support in part	<p>Taranaki Whānui support the inclusion of this method. In particular we note and support the requirement to work in partnership with mana whenua. We would like to see clear statements on the resourcing/funding and capability building of mana whenua partners included in the description.</p>	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	regulatory methods)			Taranaki Whānui want to indicate their intention to work in partnership with councils in the implementation of this method.	
S167.0173	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.3: Regional biodiversity strategy	Support	<p>Taranaki Whānui support the inclusion of this method. In particular we note and support the requirement to work in partnership with mana whenua. We would like to see clear statements on the resourcing/funding and capability building of mana whenua partners included in the description.</p> <p>Taranaki Whānui want to indicate their intention to work in partnership with the regional council in the development and implementation of the regional biodiversity strategy.</p>	Retain as notified.
S167.0174	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Support	<p>Taranaki Whānui supports this method as part of the implementation of Policy 23.</p> <p>Taranaki Whānui seek to partner with the regional council in the development of this schedule of indigenous ecosystems and habitats.</p>	Retain as notified.
S167.0175	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 48: Water allocation policy review	Support	<p>Taranaki Whānui supports this method and the absolute need to review the first in first served allocation regime.</p> <p>Taranaki Whānui support providing for iwi and hapū rights and interests, and equitable allocation. We also agree that over-allocation must be phased out.</p> <p>In giving effect to the NPS-FM and therefore Te Mana o te Wai, Taranaki Whānui are keen to partner with regional council on this policy review.</p>	Retain as notified.

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S167.0176	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Taranaki Whānui support the principle of this new method. We especially support a programme that promotes a reduction of emissions by the agricultural sector.	Retain as notified.
S167.0177	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Support	Taranaki Whānui support the principle of this new method. We would like to see clarity around the support and funding for mana whenua partners in particular.	Retain as notified.
S167.0178	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support	Taranaki Whānui support the principle of this new method. In particular we support establishing incentives that promote equity and inclusiveness. Taranaki Whānui seek to partner with council on the development of these incentives.	Retain as notified.
S167.0179	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.4: Kaitiaki indigenous biodiversity monitoring	Support	Taranaki Whānui support this new method. Taranaki Whānui note the clear mention of partnership and resourcing. Taranaki Whānui are keen to work with the regional council and to develop our kaitiaki monitoring programme.	Retain as notified.
S167.0180	Chapter 4.5: Methods	Method 53: Support mana	Support	Taranaki Whānui support the principle of this new method. In particular the support stated for mana whenua and the change in	Retain as notified.

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	to implement policies (non-regulatory methods)	whenua / tangata whenua and community restoration initiatives for indigenous ecosystems		focus of this method to include all indigenous ecosystems. Taranaki Whānui are keen to partner in the development of these initiatives.	
S167.0181	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support	Taranaki Whānui support the principle of this new method.	Retain as notified.
S167.0182	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 56: Assist the community to reduce waste and use water and energy efficiently	Not Stated / Neutral		Deleted method
S167.0183	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	General comments - anticipated environmental results	Support in part	Support in partnership (resourcing/funding) with mana whenua. Taranaki Whānui are keen to understand the process to establish the AERs. What input has come from mana whenua? Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).	Amend anticipated environmental results in partnership with mana whenua.
S167.0184	Chapter 5: Monitoring the	Integrated Management Anticipated	Not Stated / Neutral	Support in partnership (resourcing/funding) with mana whenua. Taranaki Whānui are keen to understand	Amend anticipated environmental results in partnership with mana whenua.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Regional Policy Statement and progress towards anticipated environmental results	environmental results		<p>the process to establish the AERs. What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>	
S167.0185	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Climate change Anticipated environmental results	Not Stated / Neutral	<p>Support in partnership (resourcing/funding) with mana whenua.</p> <p>Taranaki Whānui are keen to understand the process to establish the AERs. What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>	Amend anticipated environmental results in partnership with mana whenua
S167.0186	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Objective 12 Freshwater Anticipated environmental results	Not Stated / Neutral	<p>Support in partnership (resourcing/funding) with mana whenua.</p> <p>Taranaki Whānui are keen to understand the process to establish the AERs. What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>	Amend anticipated environmental results in partnership with mana whenua
S167.0187	Chapter 5: Monitoring the	Objective 13 Freshwater Anticipated	Not Stated / Neutral	<p>Support in partnership (resourcing/funding) with mana whenua.</p> <p>Taranaki Whānui are keen to understand</p>	Amend anticipated environmental results in partnership with mana whenua

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Regional Policy Statement and progress towards anticipated environmental results	environmental results		<p>the process to establish the AERs. What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>	
S167.0188	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Objective 14 Freshwater Anticipated environmental results	Not Stated / Neutral	<p>Support in partnership (resourcing/funding) with mana whenua.</p> <p>Taranaki Whānui are keen to understand the process to establish the AERs. What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>	Amend anticipated environmental results in partnership with mana whenua
S167.0189	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Indigenous ecosystems Anticipated environmental results	Not Stated / Neutral	<p>Support in partnership (resourcing/funding) with mana whenua.</p> <p>Taranaki Whānui are keen to understand the process to establish the AERs. What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>	Amend anticipated environmental results in partnership with mana whenua
S167.0190	Chapter 5: Monitoring the	Regional form, design and function Anticipated	Not Stated / Neutral	<p>Support in partnership (resourcing/funding) with mana whenua.</p> <p>Taranaki Whānui are keen to understand</p>	Amend anticipated environmental results in partnership with mana whenua

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Regional Policy Statement and progress towards anticipated environmental results	environmental results		<p>the process to establish the AERs. What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>	
S167.0191	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Natural hazards Anticipated environmental results	Not Stated / Neutral	<p>Support in partnership (resourcing/funding) with mana whenua.</p> <p>Taranaki Whānui are keen to understand the process to establish the AERs. What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that AERs need to be developed and monitored in partnership with mana whenua and include mātauranga Māori. (State of Environment Reports).</p>	Amend anticipated environmental results in partnership with mana whenua
S167.0192	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support in part	<p>Taranaki Whānui are keen to understand the method used for compiling and rating/grading the list in Appendix 1A.</p> <p>What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that this list needs to be developed in partnership with mana whenua and to include mātauranga Māori. Due to the significance of the list and what it protects, mana whenua should also partner in the management/regulating and monitoring of the implementation of Policy 24.</p>	Amend this provision to address the relief sought. [Note.: This submission point refers back to S167.088 in relation to Policy 24]
S167.0193	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	Not stated	Insert a new definition Mahinga kai (Wording adopted from Te Mahere Wai o Te Kāhui Taiao):

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					<p>Mahinga kai is described as:</p> <ul style="list-style-type: none"> • Our kaitiaki relationship with water is through mahinga kai. • Mahinga kai are the places where we practice our cultural harvest. • Mahinga kai are the taonga species; plants, birds, fish, and animals that we provide for as kaitiaki. • Mahinga kai are the activities which we undertake as kaitiaki. • Mahinga kai activities enable us to maintain and transfer kaitiaki knowledge between generations. • Mahinga kai supports cultural wellbeing through manaaki tangata; the provision of kai to our guests. • Mahinga kai enables us to assess the wellbeing of water and all that it supports; including people
S167.0194	Appendix 3: Definitions	Marae	Oppose	<p>Taranaki Whānui Note new definition needed.</p> <p>Taranaki Whānui suggests regional council provide for mana whenua to develop their own definition of marae within each iwi and hapū.</p>	Amend the definition of Marae with input from each iwi and hapū.
S167.0195	Appendix 3: Definitions	Papakāinga	Oppose	<p>Taranaki Whānui note new definition needed.</p> <p>Taranaki Whānui suggests regional council provide for mana whenua to develop their own definition of marae within each iwi and hapū.</p>	Amend the definition of Papakaainga with input from each iwi and hapū.

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S167.0196	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	Not stated	Definition needed here as used widely throughout the RPS. Something that speaks to equality of voice, goals for equity, and power-sharing.
S167.0197	Chapter 3.8: Natural hazards	General comments - natural hazards	Support in part		Give effect to higher order direction in the National Policy Statement for Freshwater Management 2020.
S167.0198	Chapter 3.8: Natural hazards	General comments - natural hazards	Support in part		Reflect the updated scientific knowledge regarding climate change and its effects.
S167.0199	Chapter 3.8: Natural hazards	General comments - natural hazards	Not Stated / Neutral		Taranaki Whānui want to signal their intention to be involved in partnership and decision-making regarding Natural Hazards.

S75 Te Aka Taura - Victoria University of Wellington Students Association (VUWSA)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S75 Te Aka Taura - Victoria University of Wellington Students Association (VUWSA)					
S75.001	Chapter 3.1A: Climate change	General comments - climate change	Support	<p>Supports new climate provisions, specifically the insertion of Chapter 3.1A: Climate Change. We recognise that climate change effects are unavoidable and commend the council in its efforts to ensure communities can prepare to adapt to these effects.</p> <p>Support maintaining of the regional emissions reduction target to stay within 1.5 degrees of warming above pre-industrial levels, including a 50% reduction by 2030 and net zero by 2050.</p> <p>Supports the RPS responding to climate change as many students and young people experience climate anxiety and worry about their futures.</p>	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S75.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	<p>Support accessible and attractive options for public transport, walking and cycling.</p> <p>Support the maintenance and strengthening of the links in the RPS between transport and urban development emissions reduction so that any new transport and urban development projects must show how they will not increase emissions.</p> <p>Support provisions that set a clear direction that everyone deserves access to good housing.</p> <p>Support provisions that encourage denser suburbs that are well connected by public transport with reduced dependence on private motor vehicle transport.</p>	Retain as notified.
S75.003	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	<p>Supports the maintenance of strong provisions on freshwater including the provisions related to Te Mana o Te Wai and the environmental bottom lines related to freshwater pollution. Te Tiriti should be upheld in freshwater policy through stringent pollution targets. The important relationship between freshwater and iwi must be recognised and reflected in regulation and consulting policies.</p> <p>Support for ambitious freshwater guidelines that serve a healthy community.</p> <p>Support for implementation of the National Policy Statement on Freshwater Management to work towards improving degraded water bodies and preventing further degradation of wetlands and streams.</p> <p>Supports the integration of Te Mana o Te Wai in freshwater management. This is about recognising the importance of freshwater ecosystems and communities relying on them for health and well-being.</p>	Retain as notified.

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S75.004	General comments	General comments - overall	Support	Generally supports the proposed change and is fully in support of work to ensure Wellington is protected for future generations, to ensure students have access to warm and liveable housing and a city that is liveable and thriving.	Retain as notified.
S75.005	General comments	General comments - overall	Not Stated / Neutral	<p>VUWSA supports the use of plain language in all areas of government, including local bodies like regional councils. Active participation is a core pillar of democracy and with more students working longer hours or multiple jobs to meet rising living costs, they need to be able to easily read and understand changes to regulations that have implications for them, so they can provide their input and ensure that their voice is heard.</p> <p>In the future, it would be great to see these documents become more accessible to the communities they serve through plain language or the inclusion of documents such as a summary and overview information sheet. Not only does this benefit those who are time-poor, but also those whose first language is not English</p>	Ensure the provisions use plain language or include documents such as a summary and overview information sheet.

S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council					
S34.001	Chapter 3: Resource management issues, objectives and summary	Overarching Issue 1: Adverse impacts on natural environments and communities	Oppose in part	The issue is negatively worded and this sets the tone for the rest of the plan change. As a result, the proposed provisions do not appear to support or acknowledge the population growth that is forecast and subsequent development that is necessary/enabled for the Wellington Region.	<p>Amend to:</p> <ul style="list-style-type: none"> include more neutral language and address balance between environmental protection and enabling the significant development necessary to accommodate forecast growth in for the region. source and reference more relevant and up to date evidence base and data to support statements and review and amend provisions based on this evidence

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	of policies and methods to achieve the objectives in the Regional Policy Statement			<p>For issue one, whilst Council recognises that adverse environmental effects need to be managed, this appears to insinuate that the listed effects are attributable solely to poorly managed land use and development activities when other external factors have also played an important part, for example, funding availability to comprehensively address mode shift and transport related emissions or to deliver networked biodiversity projects.</p> <p>In following links in the Section 32 report to technical reports supporting the provisions, it appears as if some of the evidence base relies on state of the environment monitoring reports that are now over ten years old, and so responses via proposed provisions to issues that were identified some time ago may no longer be relevant or appropriate.</p> <p>Fundamentally, issue one appears to state that growth within the region is an inherently negative outcome which is contrary to the intention and direction of the NPS- UD. Council notes that well managed and integrated growth and infrastructure can be and is good for the region - socially and economically and environmentally.</p>	
S34.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Oppose in part	<p>The issue statement is negatively worded, and this sets the tone for the rest of the plan change. As a result, the issue statement does not appear to support or acknowledge the population growth that is forecast and subsequent development that is necessary/enabled for the Wellington Region.</p> <p>Issue two appears to be incomplete and to make two separate points for which there is no supporting explanatory text.</p>	Amend to complete and provide further explanation for issue two and include more detail on the problems that this pressure is causing, that the proposed provisions are seeking to address, including providing the framework for possible infrastructure growth/delivery provisions within the RPS.

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	the objectives in the Regional Policy Statement				
S34.003	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 3: Lack of mana whenua / tangata whenua involvement in decision making	Oppose in part	The issue statement is negatively worded, and this sets the tone for the rest of the plan change.	Clarification
S34.004	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	Whilst the proposed overarching objective is supported, Council is concerned that clause (f) with regards to population growth and development is unclear and could be difficult to achieve within the context of the provisions proposed within RPSPC1.	Retain objective largely as notified but amend provisions that Council seeks changes to within this submission, and amend clause (f) of the overarching objective to read: (f) responds effectively to the current and future pressures of environmental issues such as climate change and water quality whilst providing for future population growth, required infrastructure delivery and development

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S34.005	Chapter 3.1A: Climate change	Issue 1: Greenhouse gas emissions must be reduced significantly, immediately and rapidly	Support in part	<p>Council understands the evidence supporting the climate change predictions and causes and supports the need to address climate change in the Wellington Region.</p> <p>However, it is considered that the provisions identified in the RPSPC1 do not support this, particularly without significant funding to provide infrastructure and tools to achieve this.</p>	Amend to recognise that there are tools to help address this, but that funding will be an important factor in achieving this.
S34.006	Chapter 3.1A: Climate change	Issue 3: The risks associated with natural hazards are exacerbated by climate change	Support in part	<p>Council sees no evidence within the Section 32 Assessment to support that some hard engineered solutions will inevitably become overwhelmed, and the provision fails to recognise that there also may be supporting solutions, alongside alternative solutions that can aid resilience. It is short- sighted to disregard a suite of tools which could contribute to the outcome sought.</p>	<p>Amend to read:</p> <p>"...Traditional approaches to development that have not fully considered the impacts on natural systems, and our over-reliance on hard engineered protection works, which will inevitably may become overwhelmed and uneconomic to sustain, will ultimately may increase the risk to communities and the environment."</p>
S34.007	Chapter 3.1A: Climate change	Issue 6: Social inertia and competing interests need to be overcome to successfully address climate change	Support in part	<p>This statement assumes that many people and businesses do not understand or do not want to address climate change. This is not necessarily true or evidenced. Many people are aware of the impacts of climate change but lack the ability or funding to support transition.</p>	<p>Amend to read: "Many people and businesses lack an understanding of the connection between their actions, greenhouse gas emissions and climate change and the ways that it will impact their lives. In turn, this detracts from our ability and support to conceive of the changes we can make to help the transition to a low-emissions and climate-resilient future. Social inertia and competing interests are the biggest issues to overcome to address climate change."</p>
S34.008	Chapter 3.1A: Climate change	Objective CC.1	Support in part	<p>Council supports the intention to have a low emission and climate resilient region. However, Council has some concerns about the implementation measures proposed to achieve this, and that the Section 32 does not adequately assess if</p>	<p>Retain the objective but seek amendments to some policies and methods to achieve this. Amend the explanatory text to reflect, and advocate, for the significant funding that will be required to support climate change adaptation and mitigation in new</p>

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				<p>the provisions are the most appropriate ways of achieving the desired outcome.</p> <p>There also seems to be a disconnect / conflict between what the RPSPC1 is saying and national direction/understanding.</p> <p>It needs to be recognised that success is not just a function of regional and district plans, but that funding and community buy in are also fundamental components.</p> <p>This includes central government funding, the relationship with long term plans and other measures that seek to support change such as the Emissions Reductions Plan.</p> <p>In addressing equity, it should also be recognised that, even with the proposed level of growth for Wellington Region, local authorities will not have sufficient funding through rates to support the step change necessary.</p> <p>Notwithstanding the capital costs associated with development, the maintenance and operation costs of infrastructure largely leave Councils able to only achieve a status quo if the proportion of funding required from territorial authorities remains at current levels. The Section 32 needs to consider the true scale and significance of implementation.</p>	developments.
S34.009	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose in part	<p>Council supports the intent to enable climate resilient urban areas, however, it is considered inappropriate for RPS to direct many of the measures identified to achieve this in Policy CC.14.</p> <p>It is unclear what is meant by "the ability to withstand" the factors identified. This is not consistent with terminology in the RMA and</p>	Delete the policy, or amend policy to read: "District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas." by including provisions to address: providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments. • the effects of increasing

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				<p>the policy ignores the fact that provisions in district plans alone cannot achieve this policy. There is no evidence to support what level of intensity of these hazards should be provided for nor recognition that other methods such as the three waters reform and the Building Act are relevant to the ability to achieve this policy.</p> <p>The policy fails to acknowledge that the desire to create climate resilience urban areas, will inevitably require the support of hard infrastructure alongside nature-based solutions.</p> <p>The explanation for Policy CC.4 also appears to provide direction / identifies factors that need to be addressed that more appropriately sit within a policy, rather than the reasoning for the policy. As explanatory text Council is concerned that this would not have been through a sufficient Section 32 assessment.</p> <p>It is also considered problematic to cross reference both specifically and generally to another provision that is relevant in interpreting another policy.</p> <p>The relief sought by Council is more consistent with the issues identified in the RPSPC1, provides territorial authorities flexibility to address specific issues in their areas.</p> <p>The relief sought by Council also allows recognition that there are limits to the practicality in urban areas of measures to address drought and urban water scarcity, such as off grid water sources.</p>	<p>temperatures; and urban heat island;• increasing intensity of rainfall and urban flooding;• Droughts and urban water scarcity and security;• Increased intensity of wind, cold spells, landslides, fire, and air pollution• natural hazards; and• water securityby providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well functioning urban environments."</p> <p>Explanation Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. For the purposes of this policy, climate resilient urban areas mean urban environments that have the ability to withstand;• Increased temperatures and urban heat island• Increased intensity of rainfall and urban flooding• Droughts and urban water scarcity and security• Increased intensity of wind, cold spells, landslides, fire, and air pollution</p>
S34.010	Chapter 4.2: Matters to	Policy CC.14: Climate-resilient	Oppose	There appears to be no clear legislative or policy statement support for requiring the implementation of the specific measures	Delete policy CC.14 in its entirety and consider non regulatory methods as a means of

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	be considered	urban areas - consideration		<p>proposed within this policy.</p> <p>The policy also contains several terms that are not clearly defined or clarified, e.g., 'urban greening' and requirements that neighbourhood scale infrastructure is provided for at all scales of development, with no direction on what threshold should be applied to these requirements.</p> <p>Council notes that the Section 32 report identifies that nature- based solutions are an important response to climate change adaptation and mitigation, but it is not considered that this meets the test of Section 32 (1) (b) of the RMA - that there has been sufficient examination on "whether the provisions in the proposal are the most appropriate way to achieve the objectives".</p> <p>In respect of the individual clauses:</p> <p>Clause (a) - it is unclear how this can be achieved, measured and monitored. It is noted that in some areas there is more than 10% canopy already, and many trees may not grow quickly enough to achieve the canopy requirements by 2030. It is also noted that 'tree canopy cover' is a very selective term which discounts a number of vegetation types which could contribute positively to the intent of the policy and the higher order objective but have been excluded by the use of the term 'canopy'. Council further notes that the requirements for tree canopy cover are at odds with NPS-UD, as canopy cannot work with townhouses, and it is impractical to rely solely on street trees to achieve this measure.</p> <p>Clause (c): It is not considered appropriate to set, nor does there appear to be sufficient evidence, legislative support or justification for the setting of, targets for</p>	compliance to achieve policy CC.4.

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				<p>urban roof area rainwater collection in district plans. This also ignores that there could be other nature-based solutions that may support other objectives e.g., hydraulic neutrality and open space requirements in urban areas, through methods such as green rooves or rooftop gardens.</p> <p>Clauses (b) and (c), natural water systems and capturing rainwater at a community level and rainwater tanks require space, which may not be available in an urban context. It may also be a resource burden that Council is not appropriately funded or resourced to maintain.</p> <p>Regarding clauses (e) and (f), it is unclear why the proposed provisions include requirements in district plans (or when considering consents) to address water use in buildings, and that buildings are able to withstand the effects of climate change. The proposed provisions do not address how this could be achieved in district plans, nor does there appear to be a higher order document that supports this. These provisions seem to be more appropriately dealt with through the Building Act.</p>	
S34.011	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Oppose in part	<p>This policy reads more like an overarching objective or policy.</p> <p>Council supports clause a) but is concerned that clauses b) to d) may be difficult to achieve, particularly at a resource consent level.</p> <p>The language here is also very strong, which sets a high bar, and there are no measures to determine how you would know that these lists of matters were not being met. As an example, the location of development could have an impact on access to public transport if connections</p>	<p>Amend to be an overarching objective or policy, and amend to read: Policy / Objective IM-2 XX: Equity and inclusiveness - consideration When considering an application for a notified resource consent, a notice of requirement, or a change, variation or review of a regional and district plan particular regard shall be given to achieving the objectives and policy outcomes of this RPS in an equitable and inclusive way, by: (a) avoiding addressing compounding historic grievances with iwi/Māori; and</p>

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				<p>are severed or not properly planned. However, access is also related to service provision, which is a regional council function, and regional and district plans have no control over the implementation or withdrawals of public transport services.</p> <p>Clause b) is open to much interpretation that would also be difficult to evidence at a resource consent level.</p> <p>Clause c) would not require if the policy becomes an overarching objective/policy as this is already covered by other provisions in the RPSPC1.</p> <p>Under clauses c) and d) it is unclear what the environmental issues and burdens are that this provision is seeking to address. There may also be circumstances where acting in a way that is not considered equitable, could reduce a future burden.</p> <p>The provisions should more accurately reflect the purpose of the RMA.</p>	<p>(b) not exacerbating existing addressing social inequities, in particular but not limited to, access to public transport, amenities and housing; and (c) not exacerbating environmental issues; and (d) not increasing the burden on supporting the sustainable management of resources for future generations.</p> <p>Explanation This policy requires that equity and inclusiveness are at the forefront of resource management and decision making to prevent any increase in existing inequities, to ensure intergenerational equity, and to improve the overall wellbeing of people and communities.</p>
S34.012	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	<p>Council supports the need to develop closer working relationships with mana whenua and the need to give effect to section 31 of the RMA in respect of integrated management, but it is difficult to achieve some of these matters at resource consent or notice of requirement level.</p> <p>Clause g) does not work for a consent or a notice of requirement so should be deleted or constrained only to plan changes.</p> <p>Council supports clause c) but there needs to be a clear relationship with practical and workable methods to achieve this.</p> <p>Support in particular d) and e), in that Council believes that it requires going to mana whenua to obtain information on what they think is important to them and for</p>	<p>Amend to define 'Data sovereignty' Delete clause g) or amend to exclude resource consents and notice of requirements. Amend to ensure methods of implementation are achievable.</p>

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S34.013	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	<p>mana whenua to determine the information they choose to release.</p> <p>Council is concerned with some of the drafting of this policy and its application in relation to the definition of urban areas, which is zone based and does not recognise some of the zones of Upper Hutt, such as the Special Activity Zones, as well as the Settlements Zone, which is identified in the NPS- HPL as an urban zone. In this respect there seems to be a disconnect between this policy and the WRGF.</p> <p>It is unclear what "appropriate" means in the context of this policy and consider that the original policy wording title identifies more articulately, the outcome wished to be achieved.</p> <p>The policy seems to be being used to define "a well- functioning urban environment" which is already defined in the NPS-UD and does not take account of locational differences across the region. It is unclear how the extent of the 'urban development' is defined e.g. the extent of the existing built urban environment or by zoning as at August 2022.</p> <p>This policy, along with other provisions within RSPSP1 will make it very difficult for greenfield development to be achieved, when it is necessary to meet our housing needs.</p> <p>Clause a) and a)i) seems to take a provision in section 3.8 of the NPS that applies to out of sequence developments. This does not take account of future planned long-term development and does not allow Council to address capacity issues.</p> <p>Clause a)ii)1) refers to Policy 29, which is</p>	<p>Delete or amend to be consistent with the NPS-UD definition of a well-functioning urban environment, define 'urban development' and 'planned urban area' and read: "Policy 55: Providing for appropriate urban expansion Maintaining a compact, well designed and sustainable urban form regional form - consideration</p> <p>When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region's urban areas (as at August 2022), particular regard shall be given to whether:</p> <p>a)</p> <p>i. the urban development will be well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors;</p> <p>ii. the location, design including</p> <p>1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29,</p> <p>2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values; as identified by Policy 23,</p> <p>6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC.17 b) the proposed urban development is consistent with any Future Development Strategy, or the Council's regional or local strategic growth and/or development framework or strategy that describes where and how future urban development should occur in that district or</p>

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				<p>now proposed to read "manage" and not "avoid inappropriate" development and so there should be consistency between the two provisions.</p> <p>Clause a)ii)6) refers to policies that Council is seeking to be deleted or amended.</p> <p>Clause b) could apply to any document in the absence of the Future Development Strategy being released. It should be recognised that a future document should not be relied upon as is unknown what implications such a document would have. However, any future document that is incorporated through a future plan change should be sufficiently evidenced and supported or jointly developed by all local authorities.</p> <p>Clause c) it is unclear who is developing the structure plan and how. This needs to be collaborative and approved through a relevant process in order to be given any weight in decision making. A future plan change to incorporate this document should be undertaken at a later stage.</p> <p>Clause d) Council does not consider that Policy 8 of the NPS-UD intended that out of sequence or unanticipated development should be given regard to when considering an application for resource consent, since Policy 8 only appears to refer to plan changes. It is also unclear what is meant by significant / what thresholds or locations apply.</p> <p>Council also notes that there are interrelated factors that play a part in urban development including infrastructure delivery and funding (through mechanisms such as Long Term Plans and external funding programmes), that are not</p>	<p>region, should the Future Development Strategy be yet to be released; and/or</p> <p>c) a structure plan has been prepared and approved by the wellington regional local authorities; and/or</p> <p>d) Any urban development</p> <p>.....</p> <p>Explanation</p> <p>....</p> <p>Clause (b) requires consideration... Future Development Strategy is in development, clause (b) also requires consideration to be given to the consistency with any regional strategic growth and/or development framework which is prepared and approved by the Wellington Region local authorities is currently the Wellington Regional Growth Framework Clause (d) requires consideration of any proposals that would add"</p>

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				sufficiently financed and operate on different funding cycles.	
S34.014	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Oppose in part	Regard should be given to local growth strategies in the absence of an FDS, not regional strategies for which the impact of provisions at a district level are unclear and unknown. It is inappropriate to rely on a document that does not exist and only existing documents available at the time of policy development should be relied upon.	Amend to read: "When considering an application for a resource consent or a change, variation or review of a district plan, in rural areas (as at August 2022), particular regard shall be given to whether: (d) the proposal is consistent with any Future Development Strategy , or the city or district regional or local strategic growth and/or development framework or strategy that addresses future rural development., should the Future Development Strategy be yet to be released; or(e) in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity."
S34.015	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Oppose	<p>Many of these matters are outside the control of district and city councils and so this cannot be achieved.</p> <p>This policy applies no threshold and means that even small developments or applications for alterations or a change of use to a building would be captured by this rule, placing undue burden on Council and developments.</p> <p>Clause b) is too onerous for resource consents. Particular examples are new tourism related activities in rural areas accommodation or experiences and will stymie comprehensive development opportunities that grow over time.</p> <p>d) is duplicating c)</p> <p>Under clause e) low carbon modes should</p>	<p>Define low carbon modes amend to read: "When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, require land use and transport planning within the Wellington Region is integrated in a way which:(b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity;(c) minimises private vehicle travel and trip length while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes;(d) encourages an increase in the amount of travel made by public transport and active modes; (e) provides for consider where practicable enabling a well-connected, safe and</p>

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				<p>be defined. Council is also concerned that the provision of public transport is not a function of the district plan and relies on services being provided by other organisations / agencies.</p>	<p>accessible multi modal transport networks while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical; ... Explanation: Policy 57 lists matters that need to be given particular regard when considering considered for all proposals that affect land transport outcomes. It seeks to align with the Wellington Regional Land Transport Plan and support decarbonising the transport system in the Wellington Region"</p>
S34.016	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Oppose in part	<p>It is unclear who will be promoting this and how, and at what scale properties are expected to have a farm plan. It is also unclear which mechanism is intended to be used to require farm plans and suggests regulatory processes such as resource consents may be intended to serve this function.</p> <p>Territorial authorities are unlikely to have the expertise or resources to support this.</p> <p>Farm plans under clause (b) are also not defined and this could have range of requirements.</p>	Clarify policy and define farm plans or delete clause (b).
S34.017	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Oppose in part	<p>It is unclear who is undertaking the research required by this method. We would support the approach, on the basis that it is a regional council responsibility.</p> <p>This method seems to now require territorial authorities to undertake research rather than prepare and disseminate, which presents a resourcing issue.</p>	Amend to make responsibilities clear and ensure that this is practical and feasible with the organisations/councils impacted by this provision.

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S34.018	Chapter 3.1A: Climate change	Objective CC.2	Support in part	<p>Whilst Council supports the intent to share costs and benefits equally, it is unclear what is meant by this in practice, and how this can be achieved.</p> <p>There is a lack of clarity on expectations from territorial authorities and it is noted that there are third party costs and benefits that are not within the remit of Local Government functions including resource consents.</p>	Amend to identify how this can be measured and enforced in an RMA/RPS context.
S34.019	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support in part	<p>Support insofar as it only applies to the RLTP.</p> <p>This provides appropriate direction for the regional land transport plan, which in turn will support advocacy for the regional and territorial authorities to seek funding for public transport and active modes. However, we consider this should go further and this should be prioritised not only promoted.</p> <p>Council notes however, that the implementation of which may be difficult to achieve and will require engagement with Waka Kotahi and KiwiRail for efficient regional planning for Wellington.</p>	<p>Amend policy to read: "Policy EIW.1: Prioritising Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan The Wellington Regional Land Transport Plan shall include objectives, policies and methods that prioritise promote equitable..... "</p>
S34.020	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.1: Climate change education and behaviour change programme	Support	Support in principle and that this is a regional function only.	Retain method as notified.
S34.021	Chapter 4.5: Methods to implement policies (non-	Method CC.10: Establish incentives to shift to active and public transport	Support in part	<p>Council supports measures to enable shift to active and public transport.</p> <p>However, it is unclear what an equitable and inclusive transition means or how this will be determined, enforced in an RMA context and measured</p>	Clarify what is meant by an equitable and inclusive transition, who is eligible for funding, and establish or advocate for funding to address the identified issues.

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	regulatory methods)			<p>It is also unclear who will be eligible to receive funding, e.g. Territorial Authorities.</p> <p>The funding of these incentives needs to be considered within the context of other funding needs and priorities in the region, such as the need to support underinvestment in walking and cycling, especially if these are established through the RLTP process.</p>	
S34.022	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Council supports the intent of the policy, but it states it is non-regulatory policy and then requires action under the Local Government Act, and for regulatory actions to be taken in district plans under clause (c).	Amend to make it non-regulatory measures only and delete clause c).
S34.023	Chapter 4.4: Non-regulatory policies	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Council supports mana whenua being supported to develop iwi climate change adaptation plans, to manage the impacts of climate change.	Retain provision as notified.
S34.024	Chapter 3.1A: Climate change	Objective CC.3	Support in part	<p>This objective refers to methods that are proposed for deletion under plan change 1.</p> <p>Under objective CC.3, the proposed method of implementation appears to be a regional council responsibility. However, the overarching policies identified in Objective CC.13 i.e., policies CC1, CC.2 and CC.3 requires actions from regional, district and city councils.</p> <p>Territorial authorities have some limited influence over clause (a)(i) and no ability to influence a)(ii) and a) (iii),</p>	Delete references to methods proposed for deletion. Amend to clarify roles and functions with regards to implementation methods required to achieve this objective.
S34.025	Chapter 4.1:	Policy CC.1: Reducing greenhouse	Oppose	Council considers that there is no legislative support for this policy, and it is not clear how district plans are expected to	Amend the provision to read: "Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and

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	Regulatory policies	gas emissions associated with transport infrastructure - district and regional plans		<p>give effect to this policy.</p> <p>The road controlling authorities are responsible for the design, construction and operation of the transport network and regional council is responsible for public transport provision.</p> <p>There is also a scale and significance issue with this policy, particularly when it is applied to altered transport infrastructure and no threshold has been proposed. For example, many of the existing projects in Upper Hutt in the RLTP do not align with this and would be very difficult to achieve under this policy. The policy seems to be a catch all policy that is at odds with the projects named within the RLTP.</p> <p>The ability to do this is also wholly reliant on the provision of funding and this could have unintended consequences on the ability to perform maintenance and renewal function and create additional resource burdens on territorial authorities. Under clause a) optimising transport demand is also ambiguous.</p>	<p>regional plans</p> <p>District and regional plans shall include objectives, policies, rules and/or methods to consider how require that all new and altered transport infrastructure is designed, constructed, and operated in a way that contributes to reducing greenhouse gas emissions by:</p> <p>(a) Optimising overall transport demand;</p> <p>(b) Maximising mode shift from private vehicles to public transport or active modes; and</p> <p>(c) Supporting the move towards low and zero-carbon mode"</p>
S34.026	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>Council opposes the inclusion of arbitrary timescales and requirements on territorial authorities. The regional council not in a position to mandate this, particularly in a residential context. It is not considered that this is sufficiently evidenced, nor an appropriate RMA tool that is supported by legislation or a higher order document.</p> <p>The provision, and the deadline imposed by it, places an undue resource burden on territorial authorities to identify these thresholds and a definition of "more than minor" with respect to different parts of the local transport network and for different sites.</p>	<p>Delete provision or amend provision to read:</p> <p>"By 30 June 2025, dDistrict plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to consider provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development where there are known capacity issues over a specified development threshold. where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in</p>

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				<p>A threshold in an area with known capacity issues, would be lower than where sufficient capacity exists. It also does not account for differences in site location and development typology.</p> <p>It would be unrealistic to reflect these differences in a rule and is unnecessary given that district plans contain provisions to address adverse effects, which include effects on the transport network.</p> <p>By making this a regulatory method - GWRC creates additional regulatory debate for each territorial authority with our communities, and places additional consent burdens on each plan, likely limiting development in the process which is at odds with our housing needs and the intentions of the NPS-UD.</p>	<p>greenhouse gas emissions."</p>
S34.027	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Oppose	<p>Support intent but oppose provision as written and the inclusion of arbitrary timescales. Public transport relates to a range of vehicles, and it is not appropriate, for example, to provide for rail infrastructure to be a permitted activity when other environmental effects could be significant.</p> <p>Transport is the responsibility of the road controlling authority and district plans do not prevent the provision of such infrastructure.</p> <p>Most of this will be on public land which will be covered by other processes e.g., bylaws.</p> <p>Council notes, it is unclear how can district plans can support EV charging when all parking standards were required to be removed under the NPS-UD.</p>	Delete policy in its entirety or amend to delete timescale and provide clarity on how this can be achieved.
S34.028	Chapter 4.1:	Policy 2: Reducing adverse	Support	Support the inclusion of greenhouses gasses and insofar as this relates to regional plans only.	Retain policy as notified but recognise that funding may be an issue.

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	Regulatory policies	effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans		Note that some of this is going further than national direction and could be difficult to achieve, and a significant burden for industrial businesses if not properly supported / funded.	
S34.029	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	<p>Council notes that some of these matters can extend beyond what can be achieved by district plans, especially when it comes to buildings and it is unclear how district plans are expected to promote energy efficient design.</p> <p>Some matters for buildings are more appropriately dealt with under the Building Act or via non-regulatory guidance.</p> <p>Councils is also concerned that there is an issue of scale of significance in respect of alterations to existing buildings. Some alterations to a residential building, for example, may require a consent but only because they have a minor breach of height in relation to boundary rules.</p> <p>In this case it is not reasonable or practical to apply clause b) in particular.</p>	Amend policy to delete reference to alterations to existing buildings or apply a threshold and delete reference to "promote".
S34.030	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional	Support in part	<p>It is noted that there is no legislative support for 'having particular regard for' low and zero carbon regionally significant infrastructure or definition of what this means.</p> <p>It is unclear if this includes embodied carbon and if so how this would be addressed.</p>	<p>Amend policy to read: "District and regional plans shall include policies and/or methods that recognise: (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, including and in particular low and zero carbon regionally significant infrastructure in ways that can include: (i) encourage people and goods can to</p>

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		and district plans		<p>Some regionally significant infrastructure, particularly roads may not in themselves be low or zero carbon but can accommodate low or zero carbon multi modal travel.</p> <p>Some of these matters are also not within the control of district plans to achieve, or it is unclear how the district plans can support low and zero carbon regionally significant infrastructure transitioning to low or zero carbon multi modal travel modes. As an example, district plans cannot influence travel choice, public transport fuel choice or funding to support and public transport.</p>	<p>travel to, from and around the region efficiently and safely and in ways that support transitioning to promote low or zero carbon multi modal travel modes;</p> <p>(ii) maintain public health and safety is maintained through the provision of and enabling essential services: supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</p> <p>(iii) people have support access to energy, and preferably low or zero carbon energy, so as to meet their needs; and</p> <p>(iv) people have support access to telecommunication services "</p>
S34.031	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Support insofar as this relates to regional plans.	Retain provisions as notified.
S34.032	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	<p>Council supports the intent of this policy but considers that district plans, and in particular resource consents and notice of requirements cannot achieve this, particularly in relation to optimising travel demand and influencing travel choice and ensuring public transport service provision, given public transport is a regional function.</p> <p>It is also unclear what is meant by</p>	<p>Amend to read:</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and development have been planned to optimise overall transport demand, maximising mode shift from private vehicles to</p>

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				<p>optimising travel demand.</p> <p>As with other policies there is also an issue of significance of scale. As an example, it is inappropriate for alterations of buildings to have particular regard to this.</p> <p>The NPS-UD already directs that district plans cannot require parking standards, the effects of which are yet to be fully identified.</p>	<p>public transport or active modes, in a way that contributes to reducing greenhouse gas emissions</p>
S34.033	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	<p>These matters, especially new industrial areas, are also most appropriately dealt with at a plan change or variation scale.</p>	<p>Amend policy to read: "When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan for freight distribution centres and new industrial areas or similar activities with significant freight servicing requirements, particular regard shall be given to the proximity of efficient transport networks and.."</p>
S34.034	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose	<p>This will place unnecessary and additional burdens on Councils including consent processes and does not consider scale.</p> <p>'Altered infrastructure' is an all-inclusive term can range from a change from a roundabout to traffic lights to significant road widening.</p> <p>It is also unclear how a policy that 'encourages' an action can be classified as a regulatory policy.</p> <p>Councils have no control over the end user of the infrastructure beyond enabling mode shift through, for example, the provision of cycle lanes and the operation of transport infrastructure is a function of the road controlling authority and not district plans.</p> <p>It is noted that around 51% of transport funding comes from Waka Kotahi, which has its own investment prioritisation method including criteria to assess effects</p>	<p>Delete provision in its entirety or amend to provide non-regulatory guidance.</p>

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				on climate change. It is not considered necessary or appropriate to duplicate or conflict with this (or future) Waka Kotahi assessment processes.	
S34.035	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	<p>It is unclear whether this policy applies to urban or rural areas, or both and how these are defined.</p> <p>Council is unclear on the legislative basis for the approach. Given the lack of statutory basis it is unclear how district plan could give regard to this policy in its decision making under the RMA. Therefore, Council considers this policy should relate to only regional plans should the provision be retained.</p> <p>Council considers that a suite of tools should be applied to address greenhouse gas emissions, not just one option, as all sites are all different.</p> <p>In addition, Council notes proposed methods don't seem to sit with the policy, for example, the methods include producing guidance, programmes to support reduction, and review regional response. It is inappropriate to be in a position where guidance outside of the RPS sets direction for inclusion of elements in district plan.</p> <p>This places undue obligation on the applicant and territorial authorities to assess, enforce and monitor as well as identifying thresholds.</p> <p>Council notes that there was not response by GWRC to the KCDC submission in the Section 32 report on this policy.</p>	<p>Delete provision in its entirety or amend to provide options in guidance for a suite of non-regulatory methods that could achieve an outcome rather than a regulatory approach.</p> <p>Should provision be retained, it should be amended to read: "District and RRegional plans shall include objectives, policies, rules and/or methods to prioritise..."</p> <p>District and city councils will still be required to give effect to the RPS, and assessment and appropriate measures can be assessed on a site-by-site basis.</p>
S34.036	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse	Oppose in part	<p>There is no clear evidence that this is a particular issue in the Wellington Region compared to other regions where agricultural emissions are much higher, for example Waikato where the percentage of</p>	<p>Delete the policy in its entirety or clarify that this policy and the method to achieve it are a regional only function. Review proposal to ensure that this is feasibly able to be implemented and does not place undue obligations on</p>

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		gas emissions - regional plan		<p>emissions from agriculture is over 50% according to Stats.NZ regional emissions data.</p> <p>This policy is identified as a regional function, but method CC.8 (d) (non-regulatory) appears to imply the requirement of farm plans through a resource consent process. The scale and thresholds for farm plan requirements are unclear and it does not appear scale has been considered.</p> <p>There are many minor changes to land use, or between agricultural activities where the public would be required to undergo an assessment to determine greenhouse gas emissions as a result of this policy. This places an unnecessary burden on the consents and applications. This is likely to disincentivise positive changes in land and be counterproductive to the aim of the objective.</p> <p>Council does not consider it appropriate to require landowners to go through a form of consent for a land use change which may be positive.</p> <p>It is noted that work is the Emissions Trading Scheme does not yet cover agriculture and that this does not address land use changes that would traditionally appear to have a greater possibility of emissions, but these could be remedied.</p> <p>There is no definition of what these activities might be or what tools are available to remedy, measure or monitor the effects that the RPSPC1 is seeking to address.</p>	landowners.
S34.037	Chapter 4.2: Matters to be	Policy CC.13: Managing agricultural gross	Oppose in part	This is a significant change to regional consents and will place onerous requirements on all consents, even those that:	Delete policy or amend policy to clarify that this relates to regional consents only, and set a threshold for when the provision applies, Review proposal to ensure that this is feasibly able to be implemented and does not place undue

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	considered	greenhouse gas emissions - consideration		<ul style="list-style-type: none"> • are relatively small • propose a reduction in intensity • result in a less than minor effects or • reduce environmental effects. <p>Council considers this policy does not consider future growth being required to meet our housing needs and is contrary to the outcomes sought under the NPS-UD. It also does not allow for innovation and reductions in activity without the need for a resource consent.</p>	obligations on landowners. Clarify how this will relate to the NPS-HPL.
S34.038	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support in part	This method is supported in principle, but it is unclear which mechanism territorial authorities would use to give effect to the measures identified in this method, and how this will work within the context of three waters reform.	Review and amend method to address these issues and ensure that responsibilities can feasibly be supported under the RMA. Amend g) to read "developing methods to protect future and existing public potable water supply sources"
S34.039	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support in part	<p>Integration between transport and land use is important to ensure that growth is supported by infrastructure. The RLTP is appropriate place for this to be.</p> <p>Support insofar as it only relates to the RLTP and that it can be used to support advocacy for funding.</p>	Retain provision as notified.
S34.040	Chapter 3.1A: Climate change	Objective CC.4	Support in part	<p>The is supported in principle but the Council has some concerns over the policies that relate to this objective.</p> <p>There is no full understanding of the maintenance costs associated with nature-</p>	Amend to read that "nature- based solutions are recognised as an integral part " Allow district councils to define and provide guidance on what tools best work under this policy as a mean of compliance, through their own

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				<p>based solutions, such as rain gardens in the long term and to whom this burden should fall within the context of limited territorial authority resources. It is noted that nature-based solutions have been defined in a loose way which can lead to inconsistencies and confusion. It is unclear whether it is expected that territorial authorities would define what this means, given the policies in the RPSPC1 that require provisions in district plans for them.</p> <p>It is also noted that nature-based solutions seem too be used interchangeably with green infrastructure, which has not been defined. Council seeks consistency in terms used within the RPS.</p>	<p>definition of nature-based solutions. Provide clarity on nature-based solutions vs. green infrastructure and apply consistent terms throughout the RPS.</p>
S34.041	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose in part	<p>This policy stretches the legislative powers and authority of territorial authorities and Council considers this policy should be a regional council function only.</p> <p>It is unclear what nature-based solutions would mean in a rural context, or how this would be achieved in a non-regulatory way. This could place additional burden without required financial support.</p> <p>The policy also does not consider how benefits would be apportioned when something is generated or demanded in an urban and rural area.</p>	<p>Amend to clarify as a regional council function only, what is meant and review to ensure that this can be achieved.</p>
S34.042	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	<p>Support the measures to increase forest and that this is a regional function only, however, it is unclear how this will be balanced against housing need, and it does not appear that this is supported by the Emissions Trading Scheme Credit which may impact on willingness to adopt the practice.</p> <p>There is a need to ensure that regional council adequately resources incentives for landowners.</p>	<p>Advocate for central government supporting indigenous forest cover in the Emissions Trading Scheme as the primary incentive for the implementation of this method.</p>

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S34.043	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	<p>Council is concerned that there is no legislative ability to direct district plans on the use of nature-based solutions under sections 30 and 31 of the RMA. There is also no understanding of the full maintenance costs associated with these solutions over long term.</p> <p>Council also notes that there are other solutions which can achieve positive outcomes, which do not necessarily have natural components, e.g., subsurface water attenuation.</p> <p>See our notes on Objective CC.4 for comments regarding clarity of the definition of nature-based solutions.</p>	<p>Delete or amend to make this policy a regional council function only.</p> <p>"District and R-Regional plans shall include objectives, policies, rules and/or methods..."</p> <p>Allow district councils to define and provide guidance on what tools best work under this policy as a mean of compliance, through their own definition of nature-based solutions.</p> <p>Provide clarity on nature-based solutions vs. green infrastructure and apply consistent terms throughout the RPS.</p>
S34.044	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.6: Identifying nature-based solutions for climate change	Oppose in part	<p>Whilst this is identified as a GWRC action it is unclear whether and how territorial authorities will be involved in this important work.</p> <p>It is also unclear whether there is an expectation that this will also require a regulatory response by territorial authorities, given that the RPSPC1 proposes that district plans identify and provide for nature-based solutions and seeks to include provisions in district plans relating to indigenous ecosystems.</p> <p>See our notes on Objective CC.4 for comments regarding clarity of the definition of nature-based solutions.</p>	Amend to clarify role for territorial authorities. See also related comments on Policy CC.7 and Objective CC.4.
S34.045	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose in part	<p>It is unclear what the intent of this provision is, regarding climate change mitigation or adaptation functions. Is this intending to address existing nature-based solutions or future planned solutions?</p> <p>It is also unclear how territorial authorities are supposed to identify these effects, the scale of the effects and ensure that that they are avoided.</p>	<p>Delete policy in its entirety.</p> <p>See also comments on Policy CC.7 and Objective CC.4.</p>

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				<p>Council does not oppose the intent of what the RSPSC1 is trying to achieve but considers that this places an onerous burden on territorial authorities and applicants.</p> <p>See our notes on Objective CC.4 for comments regarding clarity of the definition of nature-based solutions.</p>	
S34.046	Chapter 3.1A: Climate change	Objective CC.5	Support in part	<p>Council supports a desire to increase cover, but is concerned about timeframe, balancing this against forecasted projections of growth and subsequent development over the next 10 years and willingness and ability to implement.</p> <p>It is also not identified how this will be achieved, measured and monitored by the policies and methods below.</p> <p>It is noted that the regulatory policy relating to this objective is a regional function.</p>	Amend to remove arbitrary timeframe and review policies associated with this objective to ensure that they can be achieved (as a Tier 1 Council under the NPS-UD) and that this is identified as a regional function only.
S34.047	Chapter 3.1A: Climate change	Objective CC.6	Support in part	Support the need to increase resilience, however Council is concerned about some of the policies supporting this objective.	Retain objective as notified and review policies to ensure an ability to reasonably implement.
S34.048	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Council supports the intent but considers that the policy should be specific to changes, variations or reviews which deal with public potable water supply only.	Amend to read: When considering a change, variation or review of a regional or district plan which includes a requirement for a public potable water supply particular regard shall be given to..... (a) climate change impacts on public potable water supply , including water availability and demand..."
S34.049	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from	Support in part	<p>Council notes that section 6 of the RMA identifies the management of significant risks from natural hazards as a matter of national importance</p> <p>In this regard it would seem more appropriate to avoid inappropriate</p>	Define extreme, high, moderate and low risk and amend policy to read: Policy 29: Avoiding inappropriate Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans.

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		natural hazards - district and regional plans		<p>subdivision, use and development in areas of high to extreme risk, whilst managing development in areas assessed as having a low to moderate risk. It is also noted that under section 30 and 31 there is a direction for the avoidance or mitigation of natural hazards.</p> <p>The term 'managing' is a bit ambiguous and this policy should provide a strong message that inappropriate development should be avoided.</p> <p>It is unclear how an area of extreme, high, moderate or low risk is defined in this context.</p>	
S34.050	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>Council supports the provisions that recognise and seek to address issues relating to natural hazards.</p> <p>It is noted that under sections 6, 30 and 31 of the RMA it recognises the need to manage significant risk and avoid or mitigate effects. In this regard, Council wonder whether the policy is strong enough by using the term minimised. It is also unclear what 'minimises' means and what level of minimisation would be acceptable.</p>	<p>Retain provision a notified, except amend to read:</p> <p>"Policy 51: Minimising Addressing the risks and consequences of natural hazards - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to: ... Policy 51 aims to address minimise the risk and consequences..."</p>
S34.051	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation	Support in part	<p>Council queries the use of nature-based solutions vs. green infrastructure throughout RPSPC1, as noted on other provisions, and asks that there be consistency in terms.</p>	<p>Provide clarity, recognise that there will be costs associated with non-hard engineered measures that territorial authorities do not have the resources to meet, and amend the policy to read: "Policy 52: Addressing Minimising adverse effects</p>

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		measures - consideration		It is recognised that the green infrastructure is an appropriate method, but there will also be long-term maintenance and associated costs which should be recognised. It is also unclear of what the land requirements associated with "room for the river" means, as well an acceptable level if minimisation means in this context.	of hazard mitigation measures - consideration variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given.... Mātauranga Māori options provide a more appropriate or suitably innovative solution; ..." Amend for consistency between nature-based solutions and green infrastructure.
S34.052	Chapter 3.1A: Climate change	Objective CC.8	Support in part	Support the intent of the objective but seek amendments to some of the policies relating to it.	Retain objective as notified and seek specific relief identified in relation to policies as identified in this submission. Clarify the role of urban Māori and how they are represented within the RPSPC1.
S34.053	Chapter 3.3: Energy, infrastructure and waste	General comments - energy, infrastructure and waste	Support in part	Support the intent of the changes but seek some amendments to the policy updates in this chapter.	Seek specific relief identified in relation to policies as identified in this submission.
S34.054	Chapter 3.4: Fresh water (including public access)	Objective 12	Oppose in part	Council supports the objective in principle. However, is considered unnecessary to repeat the provisions of the NPS-FM. It is also noted that the provisions included are inaccurate, and inconsistent with the wording of the NPS- FM. Clause c) may be an issue for parts of the communities, especially for those reliant on/the users of irrigation and bore water.	Amend (c) to reflect the NPS- FM accurately.
S34.055	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	Council supports the intent of the policy to implement Te Mana o Te Wai. It is unclear what outcomes and visions need to be achieved under clause f) Council notes that the policy states regional plans will identify target attribute state, however it is unclear if/ how district plans are expected to respond and enforce	Amend to provide more clarity on clause g) and the application of the policy.

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				these targets under Policy 15, and in response to action plans required by 3.12 of the NPS-FM.	
S34.056	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>Council supports the intent to give effect to Te Mana o te Wai but is concerned that this policy appears to include a list of matters over which authorities should restrict their discretion and some matters seem to go beyond what is required in the NPS- FM.</p> <p>The policy also seems want to transfer some of the regional council functions to district and city council without fully understanding the implications of doing so and could make some infrastructure projects difficult to achieve.</p> <p>Some clauses such as clause (i) seem to require a consent requirement, which Councils may not be resourced to address.</p> <p>Council considers that this policy is overly prescriptive using 'in doing so must' and is not consistent with the Ministry for the Environment guidance on the NPS- FM, which identifies that:</p> <p>"The NPS-FM 2020 does not provide specific directions about what approaches territorial authorities should use to manage the effects of land use and development on freshwater in district plans. The approach provides flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district"</p>	<p>Work with territorial authorities to clarify roles and functions and develop a policy that is achievable. Amend policy to read:</p> <p>"District plans shall include objectives, policies, and methods including rules, that give effect to Te Mana o te Wai and section 3.5(4) of the NPS- FM, and in doing so must where relevant and practicable: ..."</p>
S34.057	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support in part	<p>Council supports the intent to fund stormwater infrastructure but does not consider that it is appropriate to 'require' that financial contributions are used as a mechanism for this.</p> <p>It is also unclear how territorial authorities are expected to determine how a fair share</p>	<p>Amend to read:</p> <p>"District plans shall may include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent, particularly where off site stormwater quality and quantity treatment is</p>

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				<p>of the cost is determined or how this links to other local authority funding processes such as the long-term plan. It should be for the local authority to determine the most appropriate funding mechanism.</p> <p>We note that network discharge consents are also a function of the regional council.</p> <p>There appears to be an issue here where territorial authorities are required to apply for a discharge consent but then are also required to collect financial contributions.</p>	<p>required., as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose."</p>
S34.058	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	<p>Some of this is already current practice and district plans must give effect to the NPS-FM.</p> <p>Council supports the amendments that move from district councils 'managing discharges' to 'managing land'.</p> <p>However, it is noted that territorial authorities do not have functions to control activities to achieve target attributable states or discharge to water.</p>	Amend to clarify this is a regional function.
S34.059	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	<p>Council supports the need to attenuate and retain water and considers that this should be a regulatory approach, except that the measures to achieve this should be non-regulatory, particularly given our comments on nature-based solutions.</p>	Retain clauses a) and b) as a non-regulatory means of compliance but include a new regulatory policy that identifies that plan changes and variations should promote and support water attenuation and retention.
S34.060	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>Council supports the policy intent and that this should apply to regional plans.</p> <p>However, in developing the objectives, policies, and methods including rules, GWRC must work with territorial authorities to ensure that the impacts any new provisions may have on infrastructure delivery, operation and maintenance are understood and addressed.</p>	Retain policy as notified but acknowledge the need include a method of delivery to address the comments from Council.

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S34.061	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose in part	<p>Council supports the intent to manage freshwater to provide for mana whenua and their relationship with te taiao.</p> <p>This represents a change in approach that would relate to all vegetation even where vegetation disturbance is a permitted activity on which district plans cannot then impose conditions. Regional council already provide guidance on earthworks management alongside provisions relating to earthworks.</p> <p>Council considers that water quality is a regional council function and the NPS- FM in its guidance identifies "flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district"</p> <p>We consider that the measures the policy is now trying to manage, is outside the scope territorial authority. Council notes that some forms of vegetation disturbance (such as trimming) do not alter the ground conditions.</p>	<p>Amend so that this applies to regional plans only or to identify measures over which territorial authorities have control.</p> <p>Amend to read: "Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance removal to..."</p> <p>If necessary, add a specific district plan policy related to erosion and sediment run-off from small scale earthworks in urban areas.</p>
S34.062	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	<p>Support changes since the exposure draft, to refer to regional consents only.</p> <p>However, the change from 'maintain' to 'protect' is significant, as well as the change in verbs from 'discourage' to 'restrict' and 'avoid' and the need to 'restore'.</p>	<p>Planning and legal review of the verbs to ensure this is feasibly able to be achieved.</p> <p>Amend the Section 32 Assessment to adequately assess this significant difference in policy direction.</p>
S34.063	Chapter 4.2: Matters to be	Policy 41: Controlling the effects of earthworks and	Support in part	<p>Support insofar as it pertains to regional functions.</p> <p>This place additional costs on our landowners with unclear/unjustified</p>	<p>Amend policy to read: Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration</p> <p>When considering an application for a regional resource consent, particular regard shall be given to</p>

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	considered	vegetation disturbance - consideration		<p>benefits.</p> <p>Districts and city councils don't control discharges and NPS- FM clause 3.5 (4) refers to managing effects of urban development on water, not discharges.</p> <p>The urban stormwater network has a regional consent and Council considers this process is better suited to manage any sediment issues.</p>	<p>controlling earthworks and vegetation disturbance by:</p> <p>(a) erosion; and</p> <p>(a) considering whether the activity will achieve environmental outcomes and target attribute states; silt and sediment runoff into water, or onto or into land that may enter water, so that healthy aquatic ecosystems are sustained; and</p> <p>(b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.</p> <p>See comment in Policy 40 for inclusion of new district plan specific policy.</p>
S34.064	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	Support amendment to apply to regional consents only.	Retain the policy as notified, as regional consents only.
S34.065	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	In regard to clause (c), Council recommends caution around how the extent of natural inland wetlands is determined and defined, and to ensure that this is consistent with the NES-F 2020.	Retain policy as notified.
S34.066	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater	Oppose in part	This uses general and undefined terms including 'urban development', 'requiring the control' and 'require the development'. This creates unnecessary confusion and will result in unequal application of the	<p>Amend to clarify definitions of identified undefined terms. Clarify role of urban Māori and how they are represented. Amend policy to address comments. Amend (i) to read:</p>

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		and the coastal marine area - regional plans		<p>policy.</p> <p>Clarity is required to determine if development includes small scale rural development, especially where it adjoins urban zones, and thresholds relating to clause (e). Through clause e), GWRC is acting in ultra vires, as it relates to limits which have not yet been defined.</p> <p>The policy direction is very strong in respect of the need to protect and enhance features under (h). This places resource burdens on territorial authorities and developments and goes beyond what is required by section 3.5 (4) if the NPS-FM</p> <p>Council is concerned that (i) would relate to very small streams and wetlands even if they are ephemeral.</p> <p>Urban development design required under (f) would also appear to require a change to district plans as well as (l), to give effect to mapped rivers and wetlands. Council notes that this put resource burdens on territorial authorities.</p> <p>A definition of wetland is required. It is unclear whether the use within the RPS is consistent with the definition under the NPS-FM.</p>	"Require riparian buffers for all natural waterbodies and avoid piping of rivers where practicable "
S34.067	Chapter 3.4: Fresh water (including public access)	Table 4	Support in part	<p>Method 36</p> <p>The proposed method considered appropriate, however as no explanation has been provided for the method, Council's ability to provide comments is constrained. It is unclear whether this method is a regulatory or non-regulatory method and Council notes there are no clear regulatory mechanisms for territorial authorities to utilise.</p> <p>Council also notes that industry led</p>	Provide an explanation for the method and develop in conjunction with submitters.

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				standards may also not be best practice, or in the greater public good.	
S34.068	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support in part	In regard to clause (a) it is unclear how provisions in a RPS are expected to address leaks when this is a maintenance issue, and delivery will be impractical within the context of three waters reform.	Review to ensure provisions can be implemented.
S34.069	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Oppose	<p>It is unclear what is meant by 'registered water suppliers and users'. Is this intended to have the same definition as Taumata Arowai - the Water Services Regulator Act 2020?</p> <p>Council notes that if the RPS also refers to existing registered water suppliers and users, territorial authorities have no authority to impose conditions over them.</p> <p>There appears to be no provisions in section 31 of the RMA to support this requirement and section 30 of the RMA identifies the development of rules "if appropriate", for the taking and use of water, as a function of the regional council. It is also unclear how this will work within the context of the three waters reform.</p> <p>Beyond this, if they are existing registered users, we do not have the ability to impinge on existing use rights in district plans, this is a regional council function only.</p> <p>A policy within an RPS should not direct joint processing of developments. This is impracticable given the separation of powers between regional and district/city councils.</p> <p>Council does not consider district plans an appropriate mechanism to regulate end water use per capita and considers this is best handled within the</p>	Delete policy or amend to establish non-regulatory methods.

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				Building Act.	
S34.070	Chapter 3.4: Fresh water (including public access)	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	No comment	No relief sought
S34.071	Chapter 3.4: Fresh water (including public access)	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	No comment	No relief sought
S34.072	Chapter 3.6: Indigenous ecosystems	Objective 16	Support in part	Council notes that 'protect' and 'enhance' is a change in direction that may be difficult to achieve within the context of limited resources.	If objective is retained, amend the policy to read: "Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are protected, enhanced maintained and where possible enhanced , and restored to a healthy functioning state"
S34.073	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>Councils opposes the arbitrary timeframe imposed on territorial authorities, particularly in advance of the NPS- IB. It is impractical to require territorial authorities to implement this policy by 2025, particularly given timeframes within the NPS-IB indicate a timeframe of 5 years from implementation.</p> <p>Council notes implementation of this policy ahead of the NPS-IB would duplicate a resource heavy and expensive process unnecessarily.</p> <p>Council supports the amendments to refer to the correct wording of mana whenua.</p>	Retain as operationally written and review once NPS-IB has been gazetted but include wording changes referring to mana whenua.
S34.074	Chapter 4.5: Methods to implement policies (non-	Method 21: Identification and protection of indigenous ecosystems and habitats	Oppose	Council fundamentally disagrees with going ahead in advance of NPS-IB being gazetted but notes that Council may be interested in working with regional council if the provision remains.	Retain as operationally written and review once NPS-IB has been gazetted.

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	regulatory methods)	with significant indigenous biodiversity values			
S34.075	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	Council fundamentally disagrees with going ahead in advance of NPS-IB being gazetted but notes that the intent of the provision by could be useful if the provision remains.	Retain as operationally written and review once NPS-IB has been gazetted.
S34.076	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.3: Regional biodiversity strategy	Oppose in part	<p>Council supports the intent to work in partnership with mana whenua regarding indigenous biodiversity, however it is inappropriate to do so prior to the NPS-IB being gazetted.</p> <p>Council is also concerned that the proposed non-regulatory method, appears to rely on a future regulatory process.</p>	Delete method in its entirety and review once NPS-IB is gazetted.
S34.077	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Support	Council supports the targets being removed from proposed provision seen in the draft RPS.	Retain method as notified.
S34.078	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous	Oppose	<p>Council is concerned that this policy aims to direct territorial authorities in advance of identifying indigenous ecosystems under Policy 23 and 24 (the timelines of which Council opposes).</p> <p>It is impractical to apply requirements, or consider whether a proposed activity is inappropriate, ahead of the NPS-IB or</p>	Retain as operationally written and review once NPS-IB has been gazetted.

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		biodiversity values - consideration		appropriately considered criteria and is likely to result in inconsistencies should changes be made to Policy 23 and 24.	
S34.079	Chapter 3.6: Indigenous ecosystems	Objective 16A	Oppose	Intent of objective is supported but is inappropriate until the NPS-IB is gazetted.	Delete in its entirety and review once the NPS-IB has been gazetted.
S34.080	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Support in part	Supports consistency across the region but Council is concerned that a proposed non-regulatory method, appears to require a regulatory response.	Retain as operationally written and review once NPS-IB has been gazetted. If the method is retained, amend method to delete clause (b) to ensure that method can be fully achieved using non regulatory methods.
S34.081	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Oppose	Council is concerned that the proposed non-regulatory approach, appears to be setting targets. It is unclear how these targets are intended to be applied via a non-regulatory mechanism. Council also notes that any targets set under the RPS require consultation.	Delete policy in its entirety and review once NPS-IB is gazetted.
S34.082	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support	Notwithstanding the general comments on waiting for the NPS- IB, we support the need to recognise mana whenua values	Retain provision as notified.
S34.083	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and	Support	Notwithstanding the general comments on waiting for the NPS- IB, we support the need to recognise mana whenua values. However, the district or regional plan components of this method need to occur once the NPS-IB has been gazetted, in order to avoid duplication and unnecessary waste of Council effort, mana whenua resources and ratepayer's money.	Retain provision as notified.

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		regional plans			
S34.084	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose in part	Council supports the intent of the policy, but it cannot be implemented until the NPS-IB, given the uncertainty of provisions once finally gazetted.	Delete indigenous biodiversity provisions until the NPS-IB is gazetted.
S34.085	Chapter 3.6: Indigenous ecosystems	Objective 16C	Oppose in part	Council supports and recognises the role of landowners and the community; however, it is unclear how conflicting values and requirements will work in practice to balance and management expectation. Council considers this is inappropriate at this time.	Delete indigenous biodiversity provisions until the NPS-IB is gazetted.
S34.086	Chapter 3.8: Natural hazards	Objective 19	Support in part	Council supports the need to recognise and address risks associated with natural hazards. See comments on Policies 29 and 51.	Retain objective as notified and seek relief sought in relation to policies 29 and 51.
S34.087	Chapter 3.8: Natural hazards	Objective 20	Support in part	Council supports the need to recognise and address risks associated with natural hazards. See comments on Policies 52, FW.7 and FW.8.	Retain objective as notified and seek relief sought in relation to policies 52, FW.7 and FW.8
S34.088	Chapter 3.8: Natural hazards	Objective 21	Support in part	Council supports the need to increase resilience. See comments on Policies 29, 51 and 52.	Retain objective as notified and seek relief sought in relation to policies 29, 51 and 52 and the definition of resilience.
S34.089	Chapter 3.9: Regional form, design and function	Objective 22	Oppose in part	Council is concerned that this objective goes beyond the requirements of the NPS-UD, and what an RPS can specify the districts should do to give effect to NPS-UD.	Amend objective to address concerns by deleting sub clauses a-k and allowing district plans flexibility to respond to local characteristics and issues.
S34.090	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability	Support in part	Council supports the intent to support vitality and vibrancy of the range of centres in the region	Retain policy as notified.

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		and vibrancy of regionally and locally significant centres - district plans			
S34.091	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	<p>Council considers this policy is unnecessary and may cause confusion, as clause (b) does not seem consistent with MDRS requirements.</p> <p>Council notes that the NPS-UD provides all the criteria necessary for adjustments to district plans as a matter of national direction and this is not required to be repeated, inaccurately, in the RPSPC1.</p>	Delete entirely or refer to 'enabling a range of building heights and density to give effect to the NPS' only without specific sub clause a) and b).
S34.092	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support in part	It is beyond the legislative ability of GWRC to direct or require district plans to protect some types of industrial development. Council notes that this policy is quite directive given the use of 'shall; and 'protect' and questions the role of the RPS to direct this	Amend policy to delete sub clauses b) and d) and not amend 'should' to "shall".
S34.093	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support	Support provisions that enable Māori to express their culture and traditions.	Retain as notified.
S34.094	Chapter 4.2:	Policy UD.2: Enable Māori	Support	Support provisions that enable Māori to express their culture and traditions.	Retain provision as notified. Consider amendment to read: "Policy UD.2 supports Māori to express their cultural

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	Matters to be considered	cultural and traditional norms - consideration			traditions and norms in land use and development. This includes recognising taonga and sites and areas of significance, awa and moana and important places to where mana whenua/ tangata still practice mātauranga in accordance with Mātauranga Māori Consider the role of urban Māori and how they are presented within the objective and policy.
S34.095	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose	Clarify that this policy relates to urban development outside of existing urban areas.	Amend policy to clarify that this relates to urban development only including the following amendments: "When considering a change of a district plan for an urban development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met: ..."
S34.096	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Oppose in part	Many of these matters are outside the legislative control and authority of district and city councils and so this cannot be achieved. It is inappropriate for these to be directed by the RPS.	Amend policy by deleting all references to 'require'.
S34.097	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Oppose	Council is concerned that the proposed non-regulatory method, appears to rely on a future regulatory process under clause (e). In addition, it is inappropriate to rely on future plans and strategies where the content of these is unknown. References to an undeveloped strategy are ultra vires.	Amend policy to provide clarity on where this should apply and include non-regulatory methods that could achieve an outcome rather than a regulatory approach and remove all references to the yet to be developed Future Development Strategy.
S34.098	Chapter 3.9: Regional	Objective 22B	Support in part	Council supports the intent of this objective, insofar as the key fundamental issues within the RPS are addressed	See comments on provisions relating to the inclusion of NPS- IB provisions, throughout this submission. Clarify how NPS-HPL relates to this objective and how it is

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	form, design and function				proposed to be implemented.
S34.099	Chapter 4.3: Allocation of responsibilities	Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	Support	Support changes to Policy 61 to refer to the correct term of 'biodiversity' not 'biological'	Retain policy as notified.
S34.0100	Appendix 3: Definitions	High density development	Oppose in part	High density development should not have a 'minimum height of 6 storeys'. It is possible to have high density without 6 storeys. It is not for RPS to direct on matters of national direction and we note the definition is not consistent with UHCC permitted activity standards.	Delete reference to minimum storey requirements.
S34.0101	Appendix 3: Definitions	Hydrological controls	Not Stated / Neutral	'Undeveloped state' is not defined but is referred to regarding hydrological controls for greenfield and brownfield developments. Would a site which has been cleared and infrastructure included still considered to be undeveloped? Or which has buildings etc, which must be removed to develop into the final land use?	Include definition of 'undeveloped state'.
S34.0102	Appendix 3: Definitions	Maintain /maintained /maintenance : (in relation to indigenous biodiversity)	Support in part	Regarding the definition of maintenance of IB - the definition refers to at least no reduction in which may result in perverse outcomes in relation to any restoration or enhancement activities and the statement at the end of the definition does not resolve this if some temporary 'reduction' is required to carry out effective restoration or enhancement activities. In addition enabling activities such as trimming or modification of vegetation to occur as necessary for the maintenance of infrastructure or prevention of harm (such	Amend definition to be more clearly enabling of restoration or enhancement activities which may temporarily reduce components of the ecosystem or habitat and enable modification that is a functional need for infrastructure, health and safety and access.

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				as fire breaks or clearance on roads or near powerlines).	
S34.0103	Appendix 3: Definitions	Medium density residential development	Support in part	Do not support including a minimum height of three stories. It is unclear why this has been included in the definition given MDH can be achieved without developments being three stories, as an example terraced housing may be two stories. MDRS rules also refer to a maximum of three stories. The definition is unhelpful and goes beyond what is required for the RPS.	Amend to delete reference to minimum storey requirements.
S34.0104	Appendix 3: Definitions	Naturally uncommon ecosystems	Oppose in part	Only 15 of 72 across NZ are mapped so we cannot know what the implications of these are. Council notes these seem to relate mainly to coastal features including dunes and areas, but they also talk about strongly leached terraces, inland dunes from river sands and habitats of acutely and chronically threatened indigenous species. It is unclear the legislative basis for the inclusion of this definition, particularly ahead of the gazetting of the NPS-IB.	Delete the proposed definition and review once NPS-IB has been gazetted and more detailed information on these ecosystems is available.
S34.0105	Appendix 3: Definitions	Nature-based solutions	Support in part	Council supports the intent of the definition but notes there needs to be a balance between increased trees with increased need for development. See comments on not directing in above policies and methods. Council considers planting forest as an action to reduce greenhouse gases, but the protection of peatlands is not an action (at least in the Upper Hutt context) and is not considered to be a good example for inclusion in the RPS.	That the definition is amended to delete 'protecting peatland to retain carbon stores.
S34.0106	Appendix 3: Definitions	Protect (in relation to indigenous biodiversity)	Oppose	The definition itself is very directive, and it is unclear how this relates to the NPS-IB, and the legal protection included.	Delete and review once NPS-IB has been gazetted.
S34.0107	Appendix 3:	Resilience (in relation to a	Not Stated / Neutral	Should relate to all resilience identified in the plan not just ecosystems e.g., resilience for people.	Amend to address comments.

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	Definitions	natural ecosystem)			
S34.0108	Appendix 3: Definitions	Strategic Transport network	Not Stated / Neutral	This is only referred to in definitions so there are no provisions relating to it. Method 16 still refers to the strategic public transport network, but this is just provision of information on areas with good access to the network. May require amendment for consistency.	Amend to address comments.
S34.0109	Appendix 3: Definitions	Tier 1 territorial authority	Not Stated / Neutral	Tier 1 authorities - words missing in the note.	Amend definition to fix errors.
S34.0110	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Oppose	Council does not support amendments to this Chapter until the NPS-IB has been gazetted. Changing this chapter at this time will result in duplication of effort and waste of ratepayer's money, and mana whenua resources, throughout the whole region.	Retain as operationally written and review once NPS-IB has been gazetted

S170 Te Rūnanga o Toa Rangatira

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S170 Te Rūnanga o Toa Rangatira					
S170.001	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Not Stated / Neutral	We (the submitters) also have provided our 'Statement of Ngāti Toa Rangatira - Freshwater Vision' as part of this submission.	Insert a new 'Statement of Ngāti Toa Rangatira - Freshwater Vision' . [Note. Please refer to the original submission for details of a draft of Statement of Ngāti Toa Rangatira - Freshwater Vision]
S170.002	Chapter 3: Resource management issues, objectives and summary of	Overarching Issue 3: Lack of mana whenua / tangata whenua	Support in part	There are issues clause 3 of the Chapter 3 changes: Firstly, lack of Mana Whenua / Tangata Whenua involvement in decision making and lack of Te Ao Māori and mātauranga Māori in making resource management decisions are two different matters. First generation plans do lack both of these components as the former one is about iwi engagement and transfer of powers and	Re-draft to read: Mana whenua / tangata whenua values, Te Ao Māori and mātauranga Māori have not been involved given sufficient weight in decision-making, including from governance level through to the implementation. As a result, mana whenua / tangata whenua values have not been adequately provided

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	policies and methods to achieve the objectives in the Regional Policy Statement	involvement in decision making		<p>allowing iwi as the decision maker; the other one is about how to use the knowledge systems of iwi and Māori in giving decisions regarding resource management.</p> <p>We (the submitter) believe the wording of Objective 3 can be strengthened even further; 'sufficient weight' suggests that, to date, Tangata Whenua / Mana Whenua had established processes and clear decision-making powers over the matters of Regional Policy Statement. However, iwi does not have such relationship with the Regional Policy Statement or the RPS acknowledges transfer of powers to Ngāti Toa Rangatira in the governance matters of Regional Policy Statement.</p>	<p>for in resource management, causing disconnection between mana whenua / tangata whenua and the environment. This caused major disruption Mana Whenua / Tangata Whenua not being able to connect with Taiaio, but also put them into a position where they were not able to perform their kaiataikitanga.</p>
S170.003	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	<p>Objective 3 (2) uses the phrase 'Te Ao Māori and Mātauranga Māori' have not been given sufficient weight in decision-making'.</p> <p>It is encouraging to see the value of mātauranga Māori being recognised in the Objective 3 A (a). It seems this objective only recognises mātauranga as a knowledge system with evidence. The Objective 3 A (a) can be improved to recognise the resource management methodologies within mātauranga.</p>	Amend Objective 3 (2) to say: 'Te Ao Māori and Mātauranga Māori' have been given limited and in some cases no weight from the governance level through the implementation".
S170.004	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	<p>We recommend that there is more recognition of the significant role that Māori have of kaitiakitanga, the obligation of care and protection for the environment, and the importance for Māori to have the ability to carry out this role.</p> <p>Objective A mentions 'integrated and respectful environmental stewardship'. Does the reference to stewardship is written to mean the Crown? If this means to say kaitiakitanga, the text needs to be clear separating these. Objectives from (a) to (e) do not mention how Objective A will be implemented with Mana Whenua; an additional clause (f) could be inserted and could mean to say: co-designs with Mana Whenua and iwi how Te Ao Māori and Mātauranga will be used, and responds to Mana Whenua and iwi principles and values and aspirations delivering environmental outcomes.</p>	<p>Recommend that there is more recognition of the significant role that Māori have of kaitiakitanga, the obligation of care and protection for the environment, and the importance for Māori to have the ability to carry out this role.</p> <p>Specify how objective A will be implemented with mana whenua by adding an additional clause "(g) co-designs with Mana Whenua and iwi how Te Ao Māori and Mātauranga will be used, and responds to Mana Whenua and iwi principles and values and aspirations delivering environmental outcomes."</p> <p>Clarify that environmental stewardship is different to kaitiakitanga.</p>

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S170.005	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support	Objective A(e) aims to respond effectively to pressures such as, climate change. However, these are not only future pressures but pressures we currently experience.	We recommend rewording this objective as to read 'responds effectively to the current and future pressures of climate change, population growth and development.'
S170.006	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	Objective A mentions 'integrated and respectful environmental stewardship'. Does the reference to stewardship is written to mean the Crown? If this means to say kaitiakitanga, the text needs to be clear separating these. Objectives from (a) to (e) do not mention how Objective A will be implemented with Mana Whenua;	Insert a new clause that mean to say: (g) co-designs with Mana Whenua and iwi how Te Ao Māori and Mātauranga will be used, and responds to Mana Whenua and iwi principles and values and aspirations delivering environmental outcomes.
S170.007	Chapter 3.1A: Climate change	Issue 4: The impacts of climate change will exacerbate existing inequities	Support in part	We note that there is placeholder introductory text to be coming for this Objective. This text will be crucial to express the different impacts our whānau and communities will face from Climate Change. Objectives 3.1.A 4 and 5 are connected but yet still, they seem to be disconnected the way they are worded. Under the Objective 3.1.A 4 'The impacts and costs of responding to climate change will not be felt equitably.' This is more so for iwi and Māori and needs to be clearer in the text to say, '...will not be felt equitably, especially iwi and Māori.'	Amendments to paragraph 4 (page 10) 4. The impacts of climate change will exacerbate existing inequities The impacts and costs of responding to climate change will not be felt equitably, especially for iwi and Māori.
S170.008	Chapter 3.1A: Climate change	Objective CC.1	Support in part	This objective is supported in part that it may not be intuitive for people to take it to next level, in terms of what the objective means and how we are supposed to give effect. This is also valid for consent planners as they take direction from higher order documents. There is Mana	Include mana whenua in this objective e.g. co-governed and co-designed with iwi and Māori and that iwi and Māori aspirations and values are not jeopardised and threatened by the said immediate, rapid, and large-scale changes.

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				<p>Whenua missing from this objective, where any decision regarding what the Objective CC.1 is trying to achieve is co-governed and co-designed with iwi and Māori. Iwi and Māori aspirations and values are not jeopardised and threatened by the said immediate, rapid, and large-scale changes.</p>	
S170.009	Chapter 3.1A: Climate change	Objective CC.3	Not Stated / Neutral	<p>The nature-based solutions suggest that there are a handful of proven and trustworthy solutions and proposals in place to responding to Climate Change. However, if looked closer, this objective targets increasing planting practices, as well as the planting extent that aims to achieve multiple outcomes as a core part of climate change adaptation. It is encouraging to see the role of increasing our forest cover and ecosystems, however the current phrasing and content of the Objective and what is actually meant, could lead to misunderstanding of offering less of a kete of larger solutions.</p> <p>The consideration behind preparing forest spatial plans seem to align with the intention of increasing forest cover for climate change adaptation purposes. However, it is unclear whether such exercise is time and resource intensive and could draw us away from the implementation path. Another question regarding spatial forest plans is that how this impacts on land ownership and land use.</p>	Clarify/assess whether forest spatial plans could draw us away from the implementation path, as well as the impact on land ownership and land use.
S170.082	Chapter 3.1A: Climate change	Objective CC.4	Not Stated / Neutral	<p>The nature-based solutions suggest that there are a handful of proven and trustworthy solutions and proposals in place to responding to Climate Change. However, if looked closer, this objective targets increasing planting practices, as well as the planting extent that aims to achieve multiple outcomes as a core part of climate change adaptation. It is encouraging to see the role of increasing our forest cover and ecosystems, however the current phrasing and content of the Objective and what is actually meant, could lead to misunderstanding of offering less of a kete of larger solutions.</p> <p>The consideration behind preparing forest spatial plans seem to align with the intention of increasing forest cover for climate change adaptation purposes. However, it is unclear whether such exercise is time and resource intensive and could draw us away from the implementation path. Another question regarding spatial</p>	Clarify/assess whether forest spatial plans could draw us away from the implementation path, as well as the impact on land ownership and land use.

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				forest plans is that how this impacts on land ownership and land use.	
S170.010	Chapter 3.1A: Climate change	Objective CC.4	Not Stated / Neutral	This objective can be strengthened from 'recognises and provides for', especially considering Policy 29, Policy 51, Policy 52, and CC.13 being non-regulatory, specifying how these policies performed and whether the current wording would improve the status quo. Since the first generation regional and district plans, the objectives could not avoid inappropriate subdivision and development in natural hazard overlays, and in some cases, plans could not deliver the objective of reducing the risk and consequences faced from natural hazards. Looking at Policy 52 to deliver this Objective, somewhat contradicts the strength of the Objective CC.4. Given that Policy CC.13 is also non-regulatory, the regulatory impact of CC.4 can be diluted in the consent process. 'recognises and provides for' could be redrafted to say 'Land use planning will respond with appropriate tools and practices...'	Use stronger wording than 'recognises and provides for'. e.g. 'Land use planning will respond with appropriate tools and practices...'
S170.011	Chapter 3.1A: Climate change	Objective CC.5	Not Stated / Neutral	Objective CC.5 is powerful in the sense that a Regional Policy Statement could impact the behavior strongly- however the Objective is implemented with Policy CC.19 climate change adaptation strategies which is a non-regulatory instrument. Can this objective be used in land use planning practices?	Clarifications to address the relief sought.
S170.083	Chapter 3.1A: Climate change	Objective CC.6	Not Stated / Neutral	This objective can be strengthened from 'recognises and provides for', especially considering Policy 29, Policy 51, Policy 52, and CC.13 being non-regulatory, specifying how these policies performed and whether the current wording would improve the status quo. Since the first generation regional and district plans, the objectives could not avoid inappropriate subdivision and development in natural hazard overlays, and in some cases, plans could not deliver the objective of reducing the risk and consequences faced from natural hazards. Looking at Policy 52 to deliver this Objective, somewhat contradicts the strength of the Objective CC.4. Given that Policy CC.13 is also non-regulatory, the regulatory impact of CC.4 can be diluted in the consent process. 'recognises and provides for' could be redrafted to say 'Land use planning will respond with appropriate tools and practices...'	Use stronger wording than 'recognises and provides for'. e.g. 'Land use planning will respond with appropriate tools and practices...'
S170.012	Chapter 3.1A:	Objective CC.6	Oppose in part	This objective does not recognise the lack of resources, funding, and capability of iwi and hapū to help build climate resilience. The wording is suggesting an objective	Objective CC.6 can be reworded to express the objective of 'increasing the resilience of iwi and hapū' if that is what was intended and clarify the audience of the Objective.Objective CC.6:

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	Climate change			that iwi and hāpu would do anyway without the RPS dictating it. This brings in the question of who is the audience of the Objective.	Resource management and adaptation planning increase the resilience of iwi and hāpu communities and the natural environment to the short, medium, and long-term effects of climate change.
S170.084	Chapter 3.1A: Climate change	Objective CC.7	Not Stated / Neutral	Objective CC.5 is powerful in the sense that a Regional Policy Statement could impact the behavior strongly-however the Objective is implemented with Policy CC.19 climate change adaptation strategies which is a non-regulatory instrument. Can this objective be used in land use planning practices?	Clarifications to address the relief sought.
S170.090	Chapter 3.1A: Climate change	Objective CC.8	Oppose in part	This objective does not recognise the lack of resources, funding, and capability of iwi and hapū to help build climate resilience. The wording is suggesting an objective that iwi and hāpu would do anyway without the RPS dictating it. This brings in the question of who is the audience of the Objective.	Objective CC.6 can be reworded to express the objective of 'increasing the resilience of iwi and hāpu' if that is what was intended and clarify the audience of the Objective.Objective CC.6: Resource management and adaptation planning increase the resilience of iwi and hāpu communities and the natural environment to the short, medium, and long-term effects of climate change.
S170.013	Chapter 3.3: Energy, infrastructure and waste	General comments - energy, infrastructure and waste	Oppose in part	<p>It is surprising to see the text used in 2013 when the RPS became operative has not changed, since New Zealand in particular, and world in general are going through some major events, that will fundamentally impact our energy use, food demand, and transport.</p> <p>Particularly, the third paragraph that refers to energy demand from all sectors continuing to grow, and with the most significant growth coming from transport. Seeing a raft of Objectives on Climate Change being introduced in this RPS, Section 3.3 is not well connected to these objectives.</p> <p>Global oil demand is changing with the invasion of Ukraine and we are living in a world where food scarcity is a real prospect. Our choice of energy will be impacted by these developments. The introductory text does not refer to this new contextual environment and reads as if we still need to grow our requirements of energy and therefore, associated emissions.</p> <p>Paragraph six that refers to our international obligations on reducing our emissions; reads as the core reason of reducing our emissions in New Zealand. We are not</p>	<p>Amend the introductory text to recognise major events and new contextual global environment that will fundamentally impact our energy use, food demand and transport, and that our associated emissions should not be growing.</p> <p>Recognise other matters that influence emissions reductions. Reflect the latest policies and documents associated with the Governments Energy strategies (2011-2021 and plan for new version to be released in 2024).</p> <p>Include broader context, by referring to the connections between infrastructure and waste and issues for tangata whenua including around water.</p> <p>Update the problem statement in the waste section. They system is still requiring land fill consent applications.</p>

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				<p>necessarily reducing our emissions because of our international obligations.</p> <p>Paragraph eight refers to 2007 and 2008 Government's Energy strategies and is not reflecting the latest policies and documents that are associated with this section. The latest New Zealand Energy Strategy is 2011-2021 and there are plans for a new one to be released in 2024.</p> <p>Section (b) and Section (c) that refers to infrastructure and waste, do not connect the dots about how infrastructure and waste has been dealt with through the RPS. The issue analysis, for instance, in these sections do not link the issues Tangata Whenua face regarding these subject-matters. For instance, the analysis of waste issues do not refer how connected this issue to infrastructure and three waters network management. These issues pop in consent applications and processes which are the inappropriate processes for them to be addressed.</p> <p>(2) Regarding the infrastructure section, it seems the discussion focus is the barriers that infrastructure faces rather than its broader context.</p> <p>(3) Regarding the waste section, a most up to date issue definition is needed, as the system is still requiring landfill consent applications for addressing waste management, although the RPS is aspiring to lessen the need for new landfills.</p>	
S170.014	General comments	General comments - overall	Support	Objective 11 could be worded to express a stronger behavioral direction to say: the quantity of waste disposed of is reduced to ultimately remove our reliance on landfills.	Objective 11 could be worded to express a stronger behavioral direction to say: the quantity of waste disposed of is reduced to ultimately remove our reliance on landfills.
S170.015	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Not Stated / Neutral	Objective 11 could be worded to express a stronger behavioral direction to say: the quantity of waste disposed of is reduced to ultimately remove our reliance on landfills. Policy 65 is non-regulatory for the extent of the Objective. To be able to remove our reliance on landfills, a policy that is regulatory will be required.	Move Policy 65 to Regulatory policy chapter
S170.016	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems introductory text	Oppose in part	Iwi and landowner values- roles are not adequately recognised and provided for. These are two different matters and need to be decoupled on page 29. It would invite confusion to bring two matters in one phrase.	Split the statement of Iwi values and landowner values into two paragraphs.

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S170.017	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support	Objective 16B is supported specifically recognising Mana Whenua values relating to indigenous biodiversity and these values are given effect to in decision-making and the roles of mana whenua as kaitiaki are supported and resourced. The use of Policy IE.2 and Policy IE.3 is also fundamental to achieve this objective.	Retain as notified.
S170.018	General comments	General comments - overall	Support in part	Objective 29A It is encouraging to see an objective that is aiming to increase the resilience of the land. The policies to implement this objective seems to be limited to forest cover and extent. Was there any deliberation of using District Plan and land use controls to strengthen the tools that are available to us increasing land resilience, not just a regional policy. Another consideration is the negative impacts of development on the decrease of resilience, how does the RPS address that?	Objective 29A It is encouraging to see an objective that is aiming to increase the resilience of the land. The policies to implement this objective seems to be limited to forest cover and extent. Was there any deliberation of using District Plan and land use controls to strengthen the tools that are available to us increasing land resilience, not just a regional policy. Another consideration is the negative impacts of development on the decrease of resilience, how does the RPS address that?
S170.019	General comments	General comments - overall	Oppose in part	Objective 31 The wording of Objective 31 can be strengthened to mean: the demand for mineral resources is met from resources located in close proximity to the areas of demand - in an appropriate way we can reduce its footprint. The Objective should not encourage further mining, and the wording could somewhat contain the need of mining and its footprint. This objective should not read to encourage mining activities further.	Objective 31 The wording of Objective 31 can be strengthened to mean: the demand for mineral resources is met from resources located in close proximity to the areas of demand - in an appropriate way we can reduce its footprint. The Objective should not encourage further mining, and the wording could somewhat contain the need of mining and its footprint. This objective should not read to encourage mining activities further.
S170.020	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support in part	The new addition to the policy where existing industrial and trade premise consent holders to demonstrate a reduction in GHGs at consent renewal is encouraging as well as the phasing out the coal. However, we are unsure of the policy impact on our communities especially given that the transition required is not too far (2024). Having access to a warm and dry house in most instances could mean domestic fires. It will be costly to change this overnight. Another question this Policy also poses is how monitoring and compliance will be performed.	Some consideration could be included on implementation (monitoring and compliance) and impact on communities.

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S170.021	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	The changes and amendments made in Policy 7 (a) and (a) (i) supporting a low or zero carbon system, Policy (i) (1), (2), and (3) are contributing to the status quo and might be doing more of the same. For instance, reducing fugitive GHGs from wastewater treatment plants and increasing the diversion of wastewater sludge, requiring efficient municipal landfill gas systems. The RPS policy intention could encourage practitioners to transition to new and innovative systems- not doing more of the same. Allowing a more efficient landfill could be seen as improvement, but the policy could re-shift focus on having no landfills.	The policy could re-shift focus on having no landfills.
S170.022	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Oppose in part	The preparation of another plan (Regional Land Transport Plan) to give effect to Policy 9 dilutes the policy intent. It is unclear that as a higher order document, the RPS will be reconciled with a lower order document (Regional Land Transport Plan), which may not be binding, producing policies to give effect to policy 9. The wording also 'promotes reduction', it is more cost-effective to reduce than promote, and why promote while we can be more directive to 'reduce'.	Reword "promote reduction" to "reduce" in the policy
S170.023	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support in part	The intent of the policy is supported - however we are conscious a variety of infrastructure is needed to be present to align, to make this happen. Without needing to own a private vehicle is a significant statement, where for affordable high quality active mode and car share infrastructure, and public transport services may not be available for our communities. We need to ensure that the policy intention is not disadvantaging our communities.	Reword the policy to include sentences to read: Regional Land Transport Plan should provide detail frameworks how this can be implemented with iwi partners and ensure a detailed co-design is worked with Tangata Whenua.
S170.024	Chapter 4.1: Regulatory policies	Policy 10: Promoting travel demand management - district	Support in part	Detailed travel demand management plans would help us make aligned decisions while land use is being planned. The production of a travel demand management plan will be time and resource intensive. It is unclear, undertaking such exercise, just to 'promote' the reduction of using non-renewables and GHG emissions justifies the time and	Retain policy 10.

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		plans and the Regional Land Transport Strategy		resource required to complete these plans. It is unclear whether they are secondary decision-making documents; should they be prepared to produce evidence for our reductions, or because they offer opportunity to change the way land is used, should they be directive rather than promotional and optional.	
S170.025	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	Policy 11 can be more directive in allowing District Plans to use more directive words for energy efficient designs for all new development.	The provision needs to be more directive with energy efficiency designs required for all new development.
S170.026	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	This policy does not make clear whose objectives that we are setting our vision for. Tangata Whenua objectives are not the same with the communities', the Crown's, or the Councils'. There are not clauses that mention Mana Whenua identifies Freshwater Management Units (FMUs), environmental flows, environmental outcomes, and limits co-designing with the Council. FMUs need to align with Sites of Significance to iwi and Māori, and this has not been mentioned or referred to in this Policy.	All sub-clauses could be re-phrased to say ' co-designed with Mana Whenua '
S170.027	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Support in part	The wording of Policy FW.1 clause (b) takes away from the strength this Policy is anchored on. This could be rewritten to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'. The clause (c) is using the word 'minimise' which does not have teeth when it comes to rules in the district plans, and their implementation. This clause caveats the land contours and extent practicable; it is unclear what triggers (rules) District Plans would have, this to be implemented. Most of the land is on challenging contours in Wellington and on hills that need to be cut out for feasible development to occur. Any mitigation that might be	Rewrite Policy FW.1 clause (b) to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'. Use stronger wording than 'minimise' in clause (c) and ensure the policy is worded in a way that the District Plan rules which flow on from this provision can be implemented. E.g. it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place. Ensure the provision is workable given the topographical and geological context. Ensure there are stormwater-basics and bottom lines, the 'musts of stormwater management and land development' are captured in this policy. If these are first achieved then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention.

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				<p>possible for flatter regions such as, Waikato or Auckland, may not be realisable, possible, or feasible in Greater Wellington.</p> <p>The policy should acknowledge and change the wording to say, if it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place.</p> <p>In summary, the policy contradicts itself because minimising earthworks in Wellington may not be able to be an option in some instances due to topography and soil conditions.</p> <p>The drafting intent of Policy FW.1 (f) is optimistic to reflect achieving multiple gains for stormwater management. In our built / urban environments, we observe the multiple issues of our stormwater network which won't be able to achieve the intent of this Policy.</p> <p>The policy should ensure there are stormwater-basics and bottom lines are achieved- not compromised then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention. The policy should focus on absolute musts of stormwater management and land development and acknowledge in the absence of standards and bottom lines, delivering other aspects may be a luxury. The policy needs to ensure the stormwater system provides safe and clever solutions to our communities then the rest, multiple positive outcomes, will come.</p> <p>The policy also needs to acknowledge the need of additional infrastructure to be able to give effect to this Policy.</p>	<p>The policy also needs to acknowledge the need of additional infrastructure and provides for safe and clever solutions for communities.</p>
S170.085	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area – district plans	Support in part	<p>The wording of Policy FW.1 clause (b) takes away from the strength this Policy is anchored on. This could be rewritten to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.</p> <p>The clause (c) is using the word 'minimise' which does not have teeth when it comes to rules in the district plans, and their implementation. This clause caveats the land contours and extent practicable; it is unclear what triggers (rules) District Plans would have, this to be implemented.</p>	<p>Rewrite Policy FW.1 clause (b) to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.</p> <p>Use stronger wording than 'minimise' in clause (c) and ensure the policy is worded in a way that the District Plan rules which flow on from this provision can be implemented. E.g. it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place. Ensure the provision is workable given the topographical and geological context. Ensure there are stormwater-basics and bottom lines, the 'musts of stormwater management and land development' are captured in this</p>

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				<p>Most of the land is on challenging contours in Wellington and on hills that need to be cut out for feasible development to occur. Any mitigation that might be possible for flatter regions such as, Waikato or Auckland, may not be realisable, possible, or feasible in Greater Wellington.</p> <p>The policy should acknowledge and change the wording to say, if it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place.</p> <p>In summary, the policy contradicts itself because minimising earthworks in Wellington may not be able to be an option in some instances due to topography and soil conditions.</p> <p>The drafting intent of Policy FW.1 (f) is optimistic to reflect achieving multiple gains for stormwater management. In our built / urban environments, we observe the multiple issues of our stormwater network which won't be able to achieve the intent of this Policy.</p> <p>The policy should ensure there are stormwater-basics and bottom lines are achieved- not compromised then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention. The policy should focus on absolute musts of stormwater management and land development and acknowledge in the absence of standards and bottom lines, delivering other aspects may be a luxury. The policy needs to ensure the stormwater system provides safe and clever solutions to our communities then the rest, multiple positive outcomes, will come.</p> <p>The policy also needs to acknowledge the need of additional infrastructure to be able to give effect to this Policy.</p>	<p>policy. If these are first achieved then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention.</p> <p>The policy also needs to acknowledge the need of additional infrastructure and provides for safe and clever solutions for communities.</p>
S170.028	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support in part	<p>Developers are required to make financial contributions to subdivision and development as a condition of their consent, ensuring that there is treatment for stormwater. It is commonly mentioned that these contributions have not been enough in the past and can only deliver less than ideal systems when it comes to stormwater systems. We are aware that Councils are geared up for reviewing their Financial Contribution policies as to identify what constitutes a 'fair contribution'. This policy could be reworded; instead of 'how a fair share of the cost is</p>	<p>This policy could be reworded; instead of 'how a fair share of the cost is determined, and the nature of the contribution' it could focus on a realistic calculation of proposed development's greater connection with the current and existing infrastructure as well as the burden that it will lay on this infrastructure.</p>

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				<p>determined, and the nature of the contribution' it could focus on a realistic calculation of proposed development's greater connection with the current and existing infrastructure as well as the burden that it will lay on this infrastructure. It is unproductive for development contributions to just focus on the site-based stormwater systems instead of looking at the whole system and its connections.</p> <p>We have seen yet again many examples in Porirua, a development does not just have impacts where it is located but need to be considered within its overall downstream and upstream environments in the whole catchment and the infrastructure associated with it. We currently do not have well established systems to cope with existing loads regarding stormwater and wastewater overflows, let alone the needs of new subdivisions and development.</p>	
S170.029	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>Policy 14: Managing contamination in stormwater from development - regional plans</p> <p>It is worthwhile to consider whether this policy could also be included in District Plans, not just the Regional Plans. The word 'manage' is not ideal as it refers to a world that we may never reduce the contamination. It is not appropriate that, with this wording we are required to accept some form of contamination to constantly occur. It is ideal that the policy intent reflects the contamination from stormwater will be phased off because we have rules and provisions in place that we stopped the contamination to reach to our rivers, ocean, and wetlands. New and existing subdivision and development (their regulation mostly covered by District Plan clauses) should not allow parū water reaching to our precious freshwater environments, in which some of them are severely contaminated already.</p>	<p>Require inclusion in District Plans as well as Regional Plans. Replace 'manage' with stronger wording to ensure the contamination of stormwater is phased out. Subdivisions should not be allowed if parū water will reach freshwater environments.</p>
S170.030	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	<p>By using the word 'managing' we are accepting and acknowledging the effects of earthworks and vegetation disturbance instead of avoiding these activities to achieve the target attribute states for water bodies and freshwater ecosystems.</p>	<p>Change the word "Managing" in the policy to avoid.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S170.031	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	This policy contradicts Te Ao Māori view that humans do not sit at the centre of Taiao and take and use of water is just for health needs of the people. The policy detail that says 'providing for the health and wellbeing of water bodies and freshwater ecosystems' in a way covers this view but also contradictorily says the 'health needs of people ahead of any take and use for other purposes while providing for...'	Amend the provision to address the contradictions outlined.
S170.032	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>The policy seems to be strengthened by using the word 'avoid' in the Policy 18 (e), (f), (g), (h) and (i) maintaining the fish passages. It is unclear, though, if the policy intention is being levelled down with the word use of 'promoting' in the clause (a), (b), (c), and (d).</p> <p>It is unclear whether the hierarchy of these clauses are considered; where 'avoidance' should be emphasized more than the 'promotion' side of the Policy 18 whether should the 'avoiding' clauses be coming first before the less directive clauses. The wording 'promote' could be rewritten into 'ensure' or 'give effect to' and rendered to a more impactful and directive policy wording instead of promoting. This will balance the priorities targeted within this policy; 'avoid' and 'ensure' reflects better of the intention of the Policy 18.</p> <p>This Policy could apply to regional plans and the district plans.</p>	Use strong wordings like 'avoid' , 'ensure' or 'give effect to' in this policy.
S170.033	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Not Stated / Neutral	<p>Policy 23 and Policy 24 identifying and protecting Significant Natural Areas (SNAs) are a critical part of the RPS. It is concerning these values to be identified by June 2024. Policy 23 and 24 have been in effect for a long time and is not ideal some Councils have not given effect to these Policies and / or gave effect partially, either to include just Public SNAs and leaving out the private land areas.</p> <p>It is crucial that councils that are tentatively holding space for these policies implement Policy 23 and 24 since District Plans to map, identify the SNAs, and undertake public consultation, and finally performing plan change to give effect to SNAs protection in the form of provisions are long processes that jeopardise the protection of SNAs.</p> <p>An important development that involves the implementation of Policy 23 and 24, is the Ministry for the Environment released the exposure draft for the National Policy Statement Indigenous Biodiversity (NPS-IB). This</p>	Ensure the provisions give effect to recent national direction.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>means there will be further policy implications to Regional Plan and District Plans. Since the exposure draft is accepting public submissions, it will be sometime for policies to take effect then to be implemented in Regional and District Plans.</p> <p>The intention of Policy 23 and 24 becomes more important where all Councils are about to give effect to National Policy Statement-Urban Development (NPS-UD) prioritising housing and development needs. It is critical that SNAs are provided protection in this uncertain environment where the Councils still to give effect to NPS-IB but will give effect to NPS-UD before National Policy Statement - Freshwater Management (NPS-FM) and NPS-IB start to take effect providing protection for our freshwater and indigenous ecosystems. Note that these NPSs are not synchronised, it is imperative Policy 23 and 24 ensures the Plan is given effect as soon as practicable.</p>	
S170.034	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Not Stated / Neutral	<p>Policy 23 and Policy 24 identifying and protecting Significant Natural Areas (SNAs) are a critical part of the RPS. It is concerning these values to be identified by June 2024. Policy 23 and 24 have been in effect for a long time and is not ideal some Councils have not given effect to these Policies and / or gave effect partially, either to include just Public SNAs and leaving out the private land areas.</p> <p>It is crucial that councils that are tentatively holding space for these policies implement Policy 23 and 24 since District Plans to map, identify the SNAs, and undertake public consultation, and finally performing plan change to give effect to SNAs protection in the form of provisions are long processes that jeopardise the protection of SNAs.</p> <p>An important development that involves the implementation of Policy 23 and 24, is the Ministry for the Environment released the exposure draft for the National Policy Statement Indigenous Biodiversity (NPS-IB). This means there will be further policy implications to Regional Plan and District Plans. Since the exposure draft is accepting public submissions, it will be sometime for policies to take effect then to be implemented in Regional and District Plans.</p> <p>The intention of Policy 23 and 24 becomes more important where all Councils are about to give effect to National Policy Statement-Urban Development (NPS-UD) prioritising housing and development needs. It is critical that SNAs are provided protection in this uncertain</p>	Ensure the provisions give effect to recent national direction.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				environment where the Councils still to give effect to NPS-IB but will give effect to NPS-UD before National Policy Statement - Freshwater Management (NPS-FM) and NPS-IB start to take effect providing protection for our freshwater and indigenous ecosystems. Note that these NPSs are not synchronised, it is imperative Policy 23 and 24 ensures the Plan is given effect as soon as practicable.	
S170.035	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	The clause (a) of this Policy, that the offsetting should not be applied if the species or ecosystems are threatened, or the ecosystem is uncommon is supported.	Retain (a) as notified.
S170.036	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	<p>This policy is a pleasant improvement from the current framework that the RPS provides for. Clauses (a), (b), and (c) allows Mana Whenua to exercise their rights, and these clauses can be strengthened.</p> <p>District and regional plans can only provide a Mātauranga framework when iwi desires to share this framework as it applies to indigenous biodiversity. This clause to say: partner with iwi to apply a mātauranga Māori framework for the management and monitoring of indigenous biodiversity' would be better.</p>	Amend clause (a) to read: (a) partner with iwi to apply a mātauranga Māori framework for the management and monitoring of indigenous biodiversity apply mātauranga Māori frameworks, and support mana whenua / tangata whenua to exercise their kaitiakitanga, in managing and monitoring indigenous biodiversity;
S170.037	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity -	Support in part	<p>This policy is a pleasant improvement from the current framework that the RPS provides for. Clauses (a), (b), and (c) allows Mana Whenua to exercise their rights, and these clauses can be strengthened.</p> <p>Clause (b) should not say actively involve as Tangata Whenua holds the kaitiakitanga status; they will plan, decide, and monitor how indigenous biodiversity is tracking. Kaitiaki Monitoring Framework should be included here and be binding for District and Regional</p>	Clause (b) should not say actively involve as Tangata Whenua holds the kaitiakitanga status; they will plan, decide, and monitor how indigenous biodiversity is tracking. Kaitiaki Monitoring Framework should be included here and be binding for District and Regional Plans. These Plans should spell out how the monitoring will be applied.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		district and regional plans		Plans. These Plans should spell out how the monitoring will be applied.	
S170.038	Chapter 4.1: Regulatory policies	Policy 1E.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	<p>This policy is a pleasant improvement from the current framework that the RPS provides for. Clauses (a), (b), and (c) allows Mana Whenua to exercise their rights, and these clauses can be strengthened.</p> <p>Clause (c) is not clear whether the (c) is allowing Mana Whenua to access and use indigenous biodiversity. This could be reworded to say Mana Whenua has access and use rights, and District and Regional Plans should acknowledge these rights and set up processes to ensure that their access and use are not limited and restricted in any way.</p>	Reword the policy to say Mana Whenua has access and use rights, and District and Regional Plans should acknowledge these rights and set up processes to ensure that their access and use are not limited and restricted in any way.
S170.039	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	<p>It is positive to see a stronger wording of Policy 29 and the intent of the policy is supported as the new wording provides. It is unclear of the Policy that specifies 'manage subdivision, use and development where the risks are low and tolerable'. The management of low and tolerable risks suggests that we might deal with cumulative effects if development is allowed in such areas. It could also mean for those who interpret the Plans where these areas are not necessarily discouraged and that we have confidence the cumulative and unknown impacts can be managed. It is unclear in this policy what tools and management options we would have that would help managing the subdivision, use and development in those areas.</p>	Retain as notified.
S170.040	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Not Stated / Neutral	<p>This policy does not mention the role of intensification and greenfield development interaction, and this may not recognise the land development trends and nuances that every city in the Greater Wellington region is going through. In Porirua, Porirua PDP Future Urban Zone (FUZ) suggested large areas of greenfield development including central government fast track greenfield development projects such as, the Plimmerton Farms. This means Porirua will gear up for quite a number of housing projects, supplied with greenfield development as well as giving effect to Government's NPS-UD requirements of intensification and densification.</p> <p>This policy is not clear where the intensification is expected to be covered by brownfield development and</p>	Retain as notified.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>whether greenfield development is considered as part of intensification. This will have repercussions for the environment.</p> <p>It is unclear that Policy UD.1 Enabling intensification - district plans is kept separately as the policy intention could have been included in Policy 31.</p>	
S170.041	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Not Stated / Neutral	<p>The policy intent of asking territorial authorities to prepare travel demand management plans is unclear. What does preparing travel demand management plans look like and whether this distracts the local authorities to execute zero carbon policies? Because producing such plans will take time, resources and requires robust evidence.</p> <p>It is unclear also whether producing these plans will bear any additional costs to communities and whether this can be done in a more efficient way through a resource consent application.</p> <p>It is unclear, the word 'minimising' in the policy refers to District Plan minimising the reliance on private vehicles, or developers are required to prepare travel management plans so that they can provide a plan on how their development promotes and enables a zero carbon travel framework.</p>	<p>Amend the provision to make it clearer that consent applicants are responsible for the preparation of travel demand management plans.</p> <p>Clarify the content and purpose of these plans.</p>
S170.042	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	<p>Policy CC.3 Environmental integration in urban development -district plans</p> <p>The policy intention is supported however, the policy wording 'ensure' is not strong enough directing district plans to integrate environment in urban development. This policy could give stronger direction to District Councils that the policy is implemented in rules and standards.</p>	<p>Amend the word 'ensure' to provide stronger direction to District Councils.</p>
S170.043	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Not Stated / Neutral	<p>Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we</p>	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p> <p>It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.</p>	
S170.044	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Not Stated / Neutral	<p>Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p> <p>It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to</p>	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.</p>	
S170.045	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Not Stated / Neutral	<p>Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p> <p>It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.</p>	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>
S170.091	Chapter 4.1: Regulatory policies	Policy CC.12: Protect, enhance and restore ecosystems that provide naturebased solutions to climate change –	Not Stated / Neutral	<p>Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we</p>	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		consideration		<p>would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p> <p>It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.</p>	
S170.046	General comments	General comments - overall	Not Stated / Neutral	<p>Historic Heritage Policy 21 and Policy 22:</p> <p>We are unsure whether Policy 21 and 22 make a distinguished note between the historic heritage and Sites and Areas of Significance to Māori (SASM) identification and mapping and protection. They should be separated - or the policy 21 and 22 to be worded to ensure that distinguishing features are identified and comes across in the paragraph.</p>	Distinguish between the historic heritage and Sites and Areas of Significance to Māori (SASM) identification and mapping and protection. Separate or ensure that distinguishing features are identified.
S170.047	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	The policy ensures the involvement of mana whenua in resource management and decision making. It incorporates a more holistic view of the environment and its interconnectedness. There might need to be further clarification that making decisions based on mātauranga Māori need to be informed by mātauranga Māori knowledge holders. In terms of sharing data and information across all relevant agencies it should be specified that mātauranga Māori data sovereignty will be upheld, and Māori decide when their knowledge is shared.	Add further clarification that making decisions based on mātauranga Māori need to be informed by mātauranga Māori knowledge holders, and that in terms of sharing data and information across all relevant agencies mātauranga Māori data sovereignty will be upheld, and Māori decide when their knowledge is shared.
S170.048	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant	Not Stated / Neutral	<p>Most regionally significant infrastructure is located where iwi and Tangata Whenua has sites of significance or cultural redress in their Treaty Settlement Claims Act.</p> <p>This consideration of Policy 39 should not clash implementing iwi's rights of Tino Rangatiratanga and should not be interpreted in a way that the need for infrastructure does not recognise the rights and interests</p>	Recognise that regionally significant infrastructure is often located where iwi and Tangata Whenua has sites of significance or cultural redress in their Treaty Settlement Claims Act. The need for infrastructure must recognise these rights and interests, and Tino Rangatiratanga.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		infrastructure - consideration		associated with the proposals. If there is such prospect of this happening, going forward should be co-designed with Tangata Whenua and iwi. This link between the sites and areas of significance and regionally significant infrastructure is crucial.	
S170.049	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Not Stated / Neutral	Policy 40 is important to consider when evaluating consents however it is challenging to identify how developers and land users will implement these considerations and how the impact of Policy 40 (a) is assessed. The Policy requires that water quality, flows and water levels and aquatic habitats of surface water bodies are 'managed in a way that gives effect to Te Mana o Te Wai' it is unclear how this will be achieved. One other question related to this matter is that if an integrated view to water and a whole catchment approach is aimed at in this consideration, why this Policy only includes surface water bodies. Couldn't a development and land use activity negatively impact the groundwater?	Amend the provision to address the relief sought.
S170.050	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Policy FW.3 Implementing Te Mana o Te Wai in urban development - consideration is supported; clauses of (i) and (l) can be strengthened by rewording. Instead of minimising earthworks extent and volume of works, this could mean to say performing earthworks, will need to be justified as to when they are absolutely needed. Identifying and mapping streams also need to be done as part of the stormwater and related-infrastructure investigations, that are attached to the consent application. This consideration could be strengthened to say no negative impact will occur in the identified and mapped streams.	Strengthen the wording of the provisions. In place of 'minimising' this could say 'performing earthworks, will need to be justified as to when they are absolutely needed'. Identifying and mapping streams must be required as part of the stormwater and related-infrastructure investigations attached to the consent application. Strengthen this provision to say no negative impact will occur in the identified and mapped streams.
S170.051	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	From this a good segue way is, the Policy 41 Controlling the effects of earthworks and vegetation disturbance - consideration as per the comments above, 'minimising' can be strengthened to say controlled or avoided. We agree that this needs to be a consideration.	Retain as notified.
S170.052	Chapter 4.2: Matters to	Policy 42: Effects on freshwater	Not Stated / Neutral	'Minimising contamination' is not adequate wording for the intention of the Policy. It is ideal this consideration to	'Minimising contamination' is not adequate wording for the intention of the Policy. Reword to say, no contamination in stormwater.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	be considered	and the coastal marine area from urban development - consideration		Policy 42 is reworded to say, no contamination in stormwater.	
S170.053	Chapter 4.2: Matters to be considered	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	How do we identify resource consents' ability to demonstrate the 'contribution to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems'? There is need for resource consents to show the environmental progress they are demonstrating in the application and proposal. It is unclear how this would be evaluated. Even in the cases of drafting clauses in consents, may not be doing much- what is our benchmark and how do we measure and label what is an ecosystem achievement? The consideration may not provide applicants and consent processing staff enough clarity and certainty to describe what is a contribution. Contribution as a word can be stronger; if this is a consideration it needs to match its empowering qualities and the level of higher order policy execution.	Require resource consents to demonstrate environmental progress to the 'contribution to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems'. Clarify how this would be evaluated (e.g. benchmarks and how this is measured) Strengthen the wording of the provision (e.g. replace 'contribution' for a stronger word).
S170.054	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Not Stated / Neutral	Policy 44 Managing water take and use to give effect to Te Mana o Te Wai - consideration This consideration needs to consider the needs of iwi and Māori and should be able to give flexibility to the needs of Mana Whenua.	Policy 44 Managing water take and use to give effect to Te Mana o Te Wai - consideration This consideration needs to consider the needs of iwi and Māori and should be able to give flexibility to the needs of Mana Whenua.
S170.055	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Not Stated / Neutral	Policy IE.3 Giving effect to mana whenua roles and values when managing indigenous biodiversity - consideration It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous biodiversity but not other parts of the Plan.	Require mana whenua roles and values to be given consideration in consent applications. All taonga need to be linked to a kaitiaki monitoring framework

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S170.086	Chapter 4.1: Regulatory policies – direction to district and regional plans and the Regional Land Transport Plan	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – district and regional plans	Not Stated / Neutral	<p>Policy IE.3 Giving effect to mana whenua roles and values when managing indigenous biodiversity - consideration</p> <p>It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous biodiversity but not other parts of the Plan.</p>	<p>Require mana whenua roles and values to be given consideration in consent applications.</p> <p>All taonga need to be linked to a kaitiaki monitoring framework</p>
S170.056	General comments	General comments - overall	Not Stated / Neutral	<p>Policy 49 Recognising and providing for matters of significance to tangata whenua - consideration</p> <p>It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous biodiversity but not other parts of the Plan. Policy 49, in a way, explains it to extend the policy intention to fresh and coastal waters in the clause (b) and the exercise of kaitiakitanga in the clause (a) however this comes through as fragmented. The word 'recognised' can be strengthened, we suggest removing this wording and leave it with providing for.</p>	<p>Require mana whenua roles and values to be given consideration in consent applications.</p> <p>All taonga need to be linked to a kaitiaki monitoring framework. Replace the word 'recognised' with stronger policy direction. We suggest removing this wording and leave it with providing for.</p>
S170.057	General comments	General comments - overall	Not Stated / Neutral	<p>Policy 48 Principles of the Treaty of Waitangi provides a generic explanation what the applicants need to provide and what the consideration would be from the perspective of resource consent issuer. Deed of Settlement Acts should be clause (c) and any other evidence that are provided such as, Cultural Impact Assessments and iwi environmental management plans.</p>	<p>Clause (c) should refer to Deed of Settlement Acts. Other relief sought unclear without the context of the relevant provision (see notes below).</p>
S170.058	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to development s that	Not Stated / Neutral	<p>Policy UD.3 Marae and papakāinga - consideration</p> <p>The consideration of this policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi. Some of these lands that are</p>	<p>This policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi. Urban Development provisions need to recognise these values, that they can change over time and that recognise they will play out differently in different sites.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
		provide for significant development capacity - consideration		<p>returned to Tangata Whenua, iwi would have a raft of different values associated to the whenua and the values will be dynamic -can change over time. Urban Development provisions need to recognise these values and that recognise they will play out differently in different sites.</p> <p>Marae and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications. This may need to extend to other taonga and sites and areas of significance, awa and moana and important places where iwi still practice cultural matāuranga.</p>	Marae and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications. This may need to extend to other taonga and sites and areas of significance, awa and moana and important places where iwi still practice cultural matāuranga.
S170.087	Chapter 4.1: Regulatory policies – direction to district and regional plans and the Regional Land Transport Plan	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land – district plans	Not Stated / Neutral	<p>Policy UD.3 Marae and papakāinga - consideration</p> <p>The consideration of this policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi. Some of these lands that are returned to Tangata Whenua, iwi would have a raft of different values associated to the whenua and the values will be dynamic -can change over time. Urban Development provisions need to recognise these values and that recognise they will play out differently in different sites.</p> <p>Marae and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications. This may need to extend to other taonga and sites and areas of significance, awa and moana and important places where iwi still practice cultural matāuranga.</p>	<p>This policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi. Urban Development provisions need to recognise these values, that they can change over time and that recognise they will play out differently in different sites.</p> <p>Marae and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications. This may need to extend to other taonga and sites and areas of significance, awa and moana and important places where iwi still practice cultural matāuranga.</p>
S170.059	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>It is important to support this policy as a consideration and appreciate the detail that it goes into covering all the potential issues we experience from natural hazards. It is noticeable there are water quality and overflow issues with our three-water network and flooding exacerbates these issues, and further making them more hazardous catalysed by the floods. There are not any connections created in the Policy 51. Yet this is an important consideration for Tangata Whenua.</p> <p>Clause (i) includes moderate risks; it is not convincing, if the risk is moderate, the Policy should not automatically</p>	<p>Recognise in the provision water quality and overflow issues with our three-water network and flooding exacerbates hazard issues.</p> <p>Clause (i) should only allow subdivision, use and development with mitigation when the hazard risk is low.</p> <p>Clarify clause (ia) and the interaction with district plans.</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				<p>allow that subdivision, use and development. Only if the risk is low then this could justify a mitigation if the hazard occurred.</p> <p>Clause (ia) is not clear; District Plans are responsible to make rules, making sure that the developments do not block the overland flood paths; do we consider the RPS should mention this, too? What policy gap this is looking into addressing or is it doubling up?</p> <p>It is unclear whether the clause (j) was too conservative, taking into account 1 in a 100-year flood as we are seeing them more often in the face of worsening impacts of Climate Change and global warming.</p>	
S170.060	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	<p>Some of the new additions to the policy are encouraging, such as the long-term viability; no increase in risk to adjacent properties, and adverse effects on Te Mana o Te Wai, Te Mana o te Taiao, and that they are considered as part of the consent applications. However, the impacts of hazard mitigation measures to be minimised: these mitigations do alter the site and change the environment in ways that we cannot bring it back.</p> <p>The wording of the first clause (a) 'justifiable', for instance is a subjective word and all flood hazard structures are justifiable at some point in time and that this may not be able to be evaluated from an objective perspective. Policy 52 does not elaborate how consent planner will make their assessment. Same with the cumulated effects, how these are assessed are important and may be made on some judgement and value points.</p> <p>The word 'minimise' still leaves policy door open for those who are inclined to think bringing hard engineering structures to the scene is the ultimate answer.</p>	Strengthen the wording of this provision, e.g. use more directive words in place of 'justifiable' and 'minimise'.
S170.061	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Not Stated / Neutral	<p>Policy 55 Establishing and maintaining well-functioning urban environments - consideration</p> <p>In clause 7, suggest delete the word 'recognise' and just keep the provide for to strengthen the intention.</p>	<p>[Note. the policy title quoted in this submission point does not align with the RPS Change1 documents, but the Decision Requested seem to be correctly referenced]</p> <p>Amend clause 7: 7. Recognises and pProvides for values of significance to mana whenua / tangata whenua,</p>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S170.062	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Not Stated / Neutral	Mana Whenua and iwi have land in rural areas that was returned through the Deed of Settlement Acts. Policy 56 consideration needs to include the execution of Tino Rangatiratanga on this land and to be able to allow the land aspirations of iwi and Māori is accounted for.	Consideration needs to include the execution of Tino Rangatiratanga on land that was returned through the Deed of Settlement Acts and provide for the land aspirations of iwi and Māori.
S170.063	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Not Stated / Neutral	The part of the Policy 58 that says 'ensure all new urban development including form, layout, location, and timing is sequenced in a way that...' seems to belong to the 'responsive planning' section of the RPS. Co-ordinating land use with development and operation of infrastructure is not just about transport as specified in clause (b).	Move 'ensure all new urban development including form, layout, location, and timing is sequenced in a way that...' to the 'responsive planning' section of the RPS. The provision should ensure that co-ordinating land use with development and operation of infrastructure is not just about transport as specified in clause (b).
S170.064	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Not Stated / Neutral	Policy CC.9 Equity and inclusiveness - consideration This clause should apply all policy in the RPS, not just to Climate Change parts. Inter-racial and inter-generational equity is impacting iwi and Mana Whenua differently as far as Climate Change impacts.	This clause should apply all policy in the RPS, not just to Climate Change parts. It should also be recognised that inter-racial and inter-generational equity is impacting iwi and Mana Whenua differently as far as Climate Change impacts.
S170.065	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Not Stated / Neutral	Policy CC.15 Reducing agricultural gross biogenic methane emissions - consideration Does this policy cover methane emissions from landfills?	Policy CC.15 Reducing agricultural gross biogenic methane emissions - consideration Does this policy cover methane emissions from landfills?
S170.066	Chapter 4.2: Matters to	Policy IM.1: Integrated	Not Stated / Neutral	How does this Policy and its consideration work in the greater context for the Regional Policy Statement?	Clarify in the provision how this will work in the context of the wider RPS.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	be considered	management - ki uta ki tai - consideration			
S170.088	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness – consideration	Not Stated / Neutral	Policy CC.9 Equity and inclusiveness - consideration This clause should apply all policy in the RPS, not just to Climate Change parts. Inter-racial and inter-generational equity is impacting iwi and Mana Whenua differently as far as Climate Change impacts.	This clause should apply all policy in the RPS, not just to Climate Change parts. It should also be recognised that inter-racial and inter-generational equity is impacting iwi and Mana Whenua differently as far as Climate Change impacts.
S170.067	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Not Stated / Neutral	General comment regarding the methods and the involvement of tangata whenua in the implementation of policies in the Regional Policy Statement: Method 32, 37 and 38. The methods (some more than the others) outlined under the Subject 'Resource Management with Tangata Whenua' should be used and applied to other topics in the RPS. The methods, Method 32, Method 37, and Method 38 are such like and cannot see these spelled out in important topics 'Climate Change', 'Regional Form, design and function', 'Natural Hazards', 'Soils and Minerals'. Suggest adding these methods into these topics.	Methods set out under 'Resource Management with Tangata Whenua' should be used and applied to other topics in the RPS. e.g. 'Climate Change', 'Regional Form, design and function', 'Natural Hazards', 'Soils and Minerals'. Suggest adding these methods into these topics.
S170.068	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 17: Reducing waste and greenhouse gases emissions from waste streams	Support in part	Method 17 Promote and assist actions on waste management It is not clear what has changed from the previous method in terms of outcomes. The wording seems that it could be strengthened. The intention of the method is not clear in the drafting; promoting and assisting actions on waste management does not seem to be targeted at what activity they are aiming for - and it is a generic statement that may not find its audience. Could this phrase be changed to say, 'ensure waste management's impact on the environment are removed gradually within the limitations of our current waste management systems'. The methods outlined are targeted at supporting District and City councils? Ideal to clarify what authority this will apply.	Strengthen the wording, making the intention of the method clear e.g. promoting and assisting actions on waste management targeted to specific activities. Amend to say, 'ensure waste management's impact on the environment are removed gradually within the limitations of our current waste management systems'. Clarify the authority of District and City councils in relation to this provision.
S170.069	Chapter 4.5: Methods to implement policies (regulatory methods)	Method FW.1: Freshwater Action Plans	Not Stated / Neutral	As a method, it does not say much about the involvement of Tangata Whenua. This could be something that Tangata Whenua would want to co-design.	Amend the provision to allow for co-design from tangata whenua.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S170.070	Chapter 4.5: Methods to implement policies (regulatory methods)	Method FW.1: Freshwater Action Plans	Not Stated / Neutral	It is not clear what role Tangata Whenua has in this process.	Amend the provision to clarify role of tangata whenua in this process.
S170.089	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Not Stated / Neutral	It is not clear what role Tangata Whenua has in this process.	Amend the provision to clarify role of tangata whenua in this process.
S170.071	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Not Stated / Neutral	Under the central government direction, how can Regional Councils achieve emission reductions from agriculture? Is this method, just limited to reviewing the regional response, which means reviewing land use emissions impact? It is not clear.	Clarify how this will achieve emissions reductions from agriculture.
S170.072	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support in part	The content covered in the Method 32 is supported, however it is not clear the intention of the drafting in some places, such as, 'engaging with stakeholders, landowners and community'. This method could emphasize 'co-design of actions, policies and implementation' -it is not an exercise just regarding sites of significance to iwi and Māori.	Retain as notified.
S170.073	Chapter 4.5: Methods to implement policies	Method 34: Prepare a regional	Not Stated / Neutral	No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	Clarify how these methods will impact iwi, hāpu and Māori.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	(non-regulatory methods)	water supply strategy			
S170.074	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Not Stated / Neutral	No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	Clarify how these methods will impact iwi, hāpu and Māori.
S170.075	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Not Stated / Neutral	No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	Clarify how these methods will impact iwi, hāpu and Māori.
S170.076	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.4: Kaitiaki indigenous biodiversity monitoring	Not Stated / Neutral	Method IE3 Kaitiaki indigenous biodiversity monitoring programme This is connected throughout the plan; kaitiaki monitoring is not intended just for biodiversity; the theme needs to spread throughout all areas of taiao. It has not been consistently applied the same language provided here in this method as it needs to be coming across all the RPS. The word 'support' mana whenua can be redrafted to say, 'ensure Mana Whenua has sufficient resources to establish a mana whenua kaitiaki monitoring programme to monitor the health of the region's indigenous biodiversity.' Note that comments made above, the kaitiaki monitoring does not just apply to indigenous biodiversity and the method should speak to how this is incorporated to the GWRC monitoring frameworks.	Amend the word 'support' to say, 'ensure Mana Whenua has sufficient resources to establish a mana whenua kaitiaki monitoring programme to monitor the health of the region's indigenous biodiversity.' Kaitiaki monitoring shouldn't just be in relation to biodiversity.
S170.077	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Not Stated / Neutral	Policy 6 recognises the significance of Porirua Harbour. This could be further discussed.	Discuss in more detail the significance of Porirua Harbour.
S170.078	Chapter 4.2: Matters to be considered	General comments - consideration policies	Not Stated / Neutral	4.2 Regulatory Policies - matters to be considered Explanations for Policy 48 (Principles of the Treaty of Waitangi) and Policy 49 (Recognising and providing for matters of significance to tangata whenua) have been removed. These are beneficial explanations which provide greater context for policies. These explanations discuss how Māori values and sites of significance should be	Reinstate explanations for Policy 48 (Principles of the Treaty of Waitangi) and Policy 49 (Recognising and providing for matters of significance to tangata whenua). If these explanations are going to be put somewhere else there should be guidance on where to find them.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				considered. If these explanations are going to be put somewhere else there should be guidance on where to find them.	
S170.079	Chapter 3.1A: Climate change	Issue 5: Climate change threatens tangible and spiritual components of Māori well-being	Support in part	If the policy intention of the Objective 3.1.A 4 was to highlight inequities, this can also be mentioned under the Objective 3.1.A 5. .	Reflect the inter-racial and inter-generational inequities that are generated within the Resource Management System and its decision-making mechanisms, which will in return impact more of our communities when dealing with Climate Change.
S170.080	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Not Stated / Neutral	It is unclear how the clause (b) come to the number 'at least 10%'. How do we identify the benefits of and understand the results of 10%? How do we make sure that the biodiversity compensation is adequate or enough to protect what we want to protect? Given that most of the species and ecosystems in Greater Wellington, in part, are limited, in danger or threatened, we are unsure the biodiversity value loss and gain can be in balance.	Ensure biodiversity compensation is adequate or enough to protect what we want to protect.
S170.081	General comments	General comments - overall	Not Stated / Neutral	It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous biodiversity but not other parts of the Plan.	There should be a framework for giving effect to mana whenua roles and values for all topics, not just indigenous biodiversity.

102 Te Tumu Paeroa | Office of the Māori Trustee

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S102 Te Tumu Paeroa Office of the Māori Trustee					
S102.001	Chapter 3:	Overarching Objective A	Support in part	Generally supports Objective A. However, Te Mana o te Wai needs to be given effect	Insert new subclause into Objective A to give effect to Te Mana o te Wai as follows:

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	Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement			to in Objective A. This will ensure that the overarching resource management objective is appropriately addressing issues raised, particularly issue 1 and 3.	Objective A Integrated management of the region's natural and built environments is guided by TeAo Māori and: (a) Gives effect to Te Mana o te Wai;...
S102.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	Generally supports Objective A. However, ki uta ki tai should be recognised and provided for within Objective A. This will ensure that mana whenua/ tangata whenua values and mātauranga Māori is appropriately recognised and provided for in decision making.	Amend Objective A(b) as follows: ... (b) recognise and provides for ki uta ki tai - the holistic nature and interconnectedness of all parts of the natural environment. ...
S102.003	Chapter 3.1A: Climate change	General comments - climate change	Support	Supports the inclusion of Chapter 3.1A as Māori land is disproportionately affected by climate change, particularly when it comes to resilience.	Retain as notified.
S102.004	Chapter 3.1A: Climate change	Objective CC.1	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.

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S102.005	Chapter 3.1A: Climate change	Objective CC.2	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.
S102.006	Chapter 3.1A: Climate change	Objective CC.3	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.
S102.007	Chapter 3.1A: Climate change	Objective CC.4	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.
S102.008	Chapter 3.1A: Climate change	Objective CC.5	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.
S102.009	Chapter 3.1A: Climate change	Objective CC.6	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.
S102.010	Chapter 3.1A: Climate change	Objective CC.7	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.
S102.011	Chapter 3.1A: Climate change	Objective CC.8	Support	Generally supports the objectives in the 'Climate Change' chapter.	Retain as notified.
S102.012	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.
S102.013	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	Generally supports regulatory policies in the 'Climate Change' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S102.014	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.
S102.015	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.
S102.016	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.
S102.017	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.
S102.018	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		change - district and regional plans			
S102.019	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.
S102.020	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.
S102.021	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.
S102.022	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.
S102.023	Chapter 4.2: Matters to	Policy CC.12: Protect, enhance and	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	be considered	restore ecosystems that provide nature-based solutions to climate change - consideration			
S102.024	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural greenhouse gas emissions - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.
S102.025	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.
S102.026	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	Policy IM.1 be changed to a regulatory policy to align with the changes sought in Objective A.	Policy IM.1 to be changed to a regulatory policy.
S102.027	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Support in part	Policy IM.1 be changed to a regulatory policy to align with the changes sought in Objective A. This is pertinent given that Māori landowners have historically been disadvantaged within the resource management system and decision-making processes. Therefore, the policy should be regulatory to prevent further inequities. This change will directly address issue 3 in the 'Proposed Amendment to Chapter 3'.	Policy IM.2 be changed to a regulatory policy.
S102.028	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementati	Support in part	Generally supports the non-regulatory policies in the 'Climate Change' chapter. However, Māori landowners should also be included in the decision-making process. This will allow for a collaborative approach, ensuring that Māori landowners have an equitable stake when it comes to outcomes	Amend Policy CC.16 as follows: Regional, city and district councils should, under the Local Government Act 2002, partner with mana whenua / tangata whenua, landowners and engage local communities in a decision-making process to develop and implement strategic climate change

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		on programmes - non-regulatory		of adaptation, managed retreat or re-location.	adaptation plans that map out management options over short, medium and long term timeframes, using a range of tools and methods.
S102.029	Chapter 4.4: Non-regulatory policies	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support in part	This policy should be "considered" at implementation as climate change will disproportionately affect Māori.	Amend policy as follows: Policy CC.17: Iwi climate change adaptation plans - non-regulatory considered.
S102.030	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.1: Climate change education and behaviour change programme	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.
S102.031	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.2: Develop carbon emissions offsetting guidance	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.
S102.032	General comments	General comments - overall	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.
S102.033	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.
S102.034	Chapter 4.5: Methods to	Method CC.5: Review regional	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (non-regulatory methods)	response to reducing agricultural greenhouse gas emissions			
S102.035	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.6: Identifying nature-based solutions for climate change	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.
S102.036	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.7: Advocating for the use of transport pricing tools	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.
S102.037	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.
S102.038	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and nature-based solutions			
S102.039	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.
S102.040	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Support	Generally supports the 'Chapter Introductions' for Freshwater (including public access).	Retain as notified.
S102.041	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	Generally supports the objectives in the 'Freshwater' chapter. However, the statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa should be recognised and provided for to ensure their expression of Te Mana o te Wai is considered appropriately when implementing the Proposed Policy Statement.	Amend Objective 12 as follows: ... And The Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa are recognised and provided for .
S102.042	Chapter 3.4: Fresh water (including public access)	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Generally supports Rangitāne o Wairarapa Te Mana o te Wai expression.	Retain as notified.
S102.043	Chapter 3.4: Fresh water (including public access)	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	Generally supports Kahungunu ki Wairarapa Te Mana o te Wai expression.	Retain as notified.
S102.044	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	Generally supports policy 12 in the 'Freshwater' chapter. However, to ensure tino rangatiratanga is exercised appropriately, affected Māori landowners should be included in the partnership.	Amend Policy 12 subclause (a) as follows: (a) are prepared in partnership with mana whenua / tangata whenua and affected Māori landowners ;

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S102.045	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Considers there is an express need for iwi, hapū and affected landowners to identify and map rivers, and in particular wetlands with the regional and district councils. This will guarantee that Māori landowners have the opportunity to ensure water bodies of significance to them are appropriately identified.	Amend Policy 14 clause (l) to read: (l) Identify and map rivers and wetlands in conjunction with iwi, hapū and affected landowners.
S102.046	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Supports Policy 17 and its implementation through regional plans, and the review of water allocation plans. However, considers that "papakāinga" should be added to point (d), to ensure water can be provided.	Amend Policy 17 clause (d) to read: (d) the taking of water for marae and papakāinga.
S102.047	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Partially supports Policy FW.3. However, to give effect to the relationship mana whenua / tangata whenua have, provision (c) needs to be more directive to preclude ambiguity within the policy.	Amend Policy FW.3 clause (c) as follows: (c) Recognise and provide for mana whenua / tangata whenua and their relationship with their culture, land, water, wāhi tapu and other taonga;
S102.048	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Considers that Policy 44 should be a regulatory policy, rather than a "Matter to be considered". This will ensure appropriate emphasis of the policy is applied and to give effect to the overarching Resource Management objective.	Amend Policy 44 to be a regulatory policy.
S102.049	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Policy FW.7 should be a "Matter to be considered", rather than non-regulatory. This will work towards strengthening a change of view and promoting and encouraging ecosystem health.	Amend Policy FW.7 to a 'considered' policy.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S102.050	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support in part	Generally supports the methods to implement in the 'Freshwater' Chapter. However, Method 32 should be a regulatory method to ensure the protection of significant values.	Amend Policy 32 to a 'regulatory' method.
S102.051	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 48: Water allocation policy review	Support in part	Supports the review of the water allocation policy in the regional policy statement, particularly alternative solutions to a first in first served policy which has historically disadvantaged Māori landowners. However, considers 'rights and interests' do not recognise the full extent of Māori rights, interests and responsibilities in freshwater, including the preservation of those rights and interests. Therefore, there is an express need to include 'responsibilities' to guarantee Māori rights, interests and responsibilities in freshwater are appropriately recognised and provided for.	Amend Method 48 clause (e) as follows: (e) provide for iwi, hapū and Māori landowners rights, and interests and responsibilities;
S102.052	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems introductory text	Support	Generally supports the inclusion of the 'Chapter Introductions' for 'Indigenous ecosystems'.	Retain as notified.
S102.053	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support	Generally supports the objectives in the 'Indigenous ecosystems' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S102.054	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support	Generally supports the objectives in the 'Indigenous ecosystems' chapter.	Retain as notified.
S102.055	Chapter 3.6: Indigenous ecosystems	Objective 16C	Support	Generally supports the objectives in the 'Indigenous ecosystems' chapter.	Retain as notified.
S102.056	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Generally supports Policy 24. However, Policy 24 should be changed to include text to state that biodiversity offsetting should not be provided for "where it is not appropriate". This will provide greater clarity as there will likely be instances where offsetting is possible but not appropriate, particularly for whenua Māori.	Amend Policy 24 subclause (a)(i) as follows: (a) not provide for biodiversity offsetting: (i) where it is not appropriate , there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or
S102.057	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	Generally support Policy IE.2. However, Policy IE.1 should include a provision for giving local effect to Te Rito o te Harakeke, to be consistent with Policy IE.2. Furthermore, Policy IE.1 should allow for Māori landowners to exercise kaitiakitanga on their whenua as not all Māori within the same iwi or hapū have the same tikanga when managing and monitoring indigenous biodiversity on their land.	Amend Policy IE.1 clause (a) as follows: (a) apply mātauranga Māori frameworks, and support mana whenua / tangata whenua and Māori landowners to exercise their kaitiakitanga, in managing and monitoring indigenous biodiversity, including giving effect to Te Rito o te Harakeke .
S102.058	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats	Support in part	Generally supports the policies that need to be considered in the 'Indigenous ecosystems' chapter. However, under Policy 47, there is a need to expressly state that Māori values be included as part of any assessment of biodiversity values.	Insert a new clause in Policy 47, as follows: (j) identified historical, cultural and spiritual relationships and values tangata whenua have with indigenous biodiversity.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		with significant indigenous biodiversity values - consideration			
S102.059	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support	Generally supports the non-regulatory policies in the 'Indigenous ecosystems' chapter.	Retain as notified.
S102.060	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support	Generally supports the non-regulatory policies in the 'Indigenous ecosystems' chapter.	Retain as notified.
S102.061	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support in part	<p>Generally supports the methods to implement in the 'Indigenous ecosystems' chapter.</p> <p>Supports the consideration for rates rebates, particularly as whenua Māori tends to have a greater amount of indigenous cover, limiting its land use capabilities.</p> <p>However, Māori landowners should be assisted in the cost to maintain, enhance and restore indigenous ecosystems by way of Ngā Whenua Rāhui as well as QEII covenants.</p>	<p>Amend Method 54 as follows:</p> <p>...</p> <p>(a) assisting with the costs of legally protecting indigenous ecosystems by way of open space covenants with Queen Elizabeth the Second National Trust (QEII) and Ngā Whenua Rāhui;</p>
S102.062	Chapter 4.5: Methods	Method IE.1: Partnering with mana	Support in part	Considers Method IE.1 be changed to "regulatory" to guarantee partnership with mana whenua/tangata whenua is	Amend Method IE.1 to a 'regulatory' method.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	to implement policies (non-regulatory methods)	whenua / tangata whenua to give local effect to Te Rito o te Harakeke		established to give effect to Te Rito o te Harakeke by the Regional Council.	
S102.063	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Support	Supports Method IE.2.	Retain as notified.
S102.064	Chapter 3.8: Natural hazards	Objective 19	Support	Generally supports the objectives in the 'Natural Hazards' chapter.	Retain as notified.
S102.065	Chapter 3.8: Natural hazards	Objective 20	Support	Generally supports the objectives in the 'Natural Hazards' chapter.	Retain as notified.
S102.066	Chapter 3.8: Natural hazards	Objective 21	Support	Generally supports the objectives in the 'Natural Hazards' chapter.	Retain as notified.
S102.067	Chapter 3.8: Natural hazards	Natural hazards introductory text	Support	Generally supports the inclusion of the 'Chapter Introductions' for Natural Hazards.	Retain as notified.
S102.068	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Generally supports Policy 29 in the 'Natural Hazards' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S102.069	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 1: District plan implementation	Support	Generally supports the methods to implement for the 'Natural Hazards' chapter.	Retain as notified.
S102.070	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 4: Consideration - resource consents, notices of requirement and when changing, varying or reviewing plans	Support	Generally supports the methods to implement for the 'Natural Hazards' chapter.	Retain as notified.
S102.071	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support	Generally supports the methods to implement for the 'Natural Hazards' chapter.	Retain as notified.
S102.072	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Support	Generally supports the methods to implement for the 'Natural Hazards' chapter.	Retain as notified.
S102.073	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 5: Allocation of responsibilities	Support	Generally supports the methods to implement for the 'Natural Hazards' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	y methods)				
S102.074	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support	Generally supports the inclusion of the 'Chapter Introductions' for the Regional form, design and function.	Retain as notified.
S102.075	Chapter 3.9: Regional form, design and function	Objective 22	Support	Generally supports the objectives in the 'Regional form, design and function' chapter.	Retain as notified.
S102.076	Chapter 3.9: Regional form, design and function	Objective 22B	Support	Generally supports the objectives in the 'Regional form, design and function' chapter.	Retain as notified.
S102.077	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support in part	Generally supports the regulatory policies in the 'Regional form, design and function' chapter. Provision UD.1(f) should provide for the development of land owned by Māori landowners, whether its whenua under General land or Māori Freehold land.	Amend Policy UD.1 clause (f) as follows: (f) providing for the development of land owned by mana whenua / tangata whenua and Māori landowners.
S102.078	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support	Generally supports the policies that need to be considered in the 'Regional form, design and function' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S102.079	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Generally supports the non-regulatory policies in the 'Regional form, design and function' chapter.	Retain as notified.
S102.080	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support	Generally supports the methods to implement for the 'Regional form, design and function' chapter.	Retain as notified.
S102.081	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support	Generally supports Policy 3 for the Coastal Environment.	Retain as notified.
S102.082	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 1: District plan implementation	Support	Generally supports the methods to implement for the 'Coastal Environment' chapter.	Retain as notified.
S102.083	Chapter 4.5: Methods to implement	Method 2: Regional plan implementation	Support	Generally supports the methods to implement for the 'Coastal Environment' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	t policies (regulatory methods)				
S102.084	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 4: Consideration - resource consents, notices of requirement and when changing, varying or reviewing plans	Support	Generally supports the methods to implement for the 'Coastal Environment' chapter.	Retain as notified.
S102.085	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Support	Generally supports the methods to implement for the 'Coastal Environment' chapter.	Retain as notified.
S102.086	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support	Generally supports the methods to implement for the 'Coastal Environment' chapter.	Retain as notified.
S102.087	Chapter 4.5: Methods	Method 53: Support mana	Support	Generally supports the methods to implement for the 'Coastal Environment' chapter.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	to implement policies (non-regulatory methods)	whenua / tangata whenua and community restoration initiatives for indigenous ecosystems			
S102.088	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	Generally supports the content of IM.1 for 'Integrated Management'. However, Policy IM.1 should be changed to 'regulatory'. This will ensure that recognising and providing for Ki uta ki tai is paramount to resource management decisions. Furthermore, mana whenua/tangata whenua should be actively involved in resource management and decision-making to directly address Issue 3 in the 'Proposed Amendment to Chapter 3'.	Amend Policy IM.3 clause (a) as follows: (a) partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua active involvement in resource management and decision making.
S102.089	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support in part	Generally supports Method IM.1 for 'Integrated management'. The methods of implementation of Method IM.1 should be alongside mana whenua/tangata whenua to guarantee that the fundamental concept of ki uta ki tai is integrated appropriately.	Amend Method IM.1 as follows: Implementation: Wellington Regional Council*, city and district councils, and mana whenua/tangata whenua.
S102.090	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support in part	Generally supports Method IM.1 for 'Integrated management'. However, considers that Method IM.1 be changed to regulatory. This coincides with the requested change of Policy IM.1 to regulatory, further strengthening the implementation of ki uta ki tai.	Amend Method IM.1 to a 'regulatory' method.
S102.091	Chapter 4.5: Methods to implement policies (non-	Method IM.2: Protection and interpretation of Mātauranga	Support in part	Generally supports IM.2 for 'Integrated Management'. However, Method IM.2 should be changed to regulatory, ensuring adequate protection is afforded to mātauranga Māori and Māori data sovereignty within the Proposed Policy Statement.	Amend Method IM.2 to a 'regulatory' method.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	regulatory methods)	Māori and Māori data			
S102.092	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.2: Protection and interpretation of Mātauranga Māori and Māori data	Support in part	Generally supports Method IM.2 for 'Integrated management'. However, the methods of implementation of Method IM.2 should be alongside mana whenua/tangata whenua. This will ensure that mātauranga Māori and Māori data sovereignty is protected and interpreted as intended.	Amend Method IM.2 as follows: Implementation: Wellington Regional Council and mana whenua/tangata whenua.
S102.093	Appendix 3: Definitions	Papakāinga	Oppose	The reason for the removal of "Papakāinga" is entirely unclear. In the absence of a good reason, the definition should be reinstated and should include reference to residential accommodation, communal buildings and facilities for iwi, hapu and/or Māori landowners who whakapapa to the area. Consultation with iwi, hapu and/or Māori landowners should be undertaken.	Oppose the removal of "Papakāinga". Amend the "Papakāinga" definition following further consultation with iwi, hapu and Māori landowners to include reference to residential accommodation, communal buildings and facilities for iwi, hapu and/or Māori landowners who whakapapa to the area.
S102.094	Chapter 3.1A: Climate change	Climate change introductory text	Support	Generally supports the chapter introductions for climate change.	Retain as notified.
S102.095	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Considers that Policy 52 should be a "Regulatory" option, rather than a "Consideration" option, to give this greater weight.	Amend Policy 52 to a regulatory policy.
S102.096	Appendix 3: Definitions	General comments - definitions	Support in part	'Ancestral land' is not defined and should be defined in the definitions chapter to avoid ambiguity in regards to individual's interpretation of ancestral lands and their extent.	Insert definition for 'Ancestral Land'.
S102.097	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development and ongoing	Support in part	Believes there is a need for the Regional Council to clarify who will identify a Māori Purpose Zone, if it is appropriate within the districts. Considers that it is appropriate that iwi, hapū and Māori landowners identify a Māori Purpose Zone in their respective rohe.	clarify who will identify a Māori Purpose Zone if deemed appropriate

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		relationship of mana whenua / tangata whenua with their ancestral land - district plans			

S22 Tegan McGowan

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S22 Tegan McGowan					
S22.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Support councils doing everything to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.
S22.002	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Support provisions for uplifting Te Mana o Te Wai.	Retain, refine and enhance provisions.
S22.003	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Support creating climate-resilient urban areas.	Retain, refine and enhance provisions.
S22.004	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support the provisions supporting biodiversity.	Retain, refine and enhance provisions.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S22.005	Chapter 3.1A: Climate change	General comments - climate change	Support	Support provisions relating to reducing emissions and Traffic Demand Plans. There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other policy tools than TDM plans, provisions be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.

S126 Templeton Kapiti Limited (TKL)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S126 Templeton Kapiti Limited (TKL)					
S126.001	Appendix 3: Definitions	Regionally significant infrastructure	Oppose in part	<p>Kāpiti Coast Airport does not significantly support efficient travel to and from the region or significantly support the maintenance of public health and safety through essential services. There is no legal obligation for, or basis for an assumption that, KCA will remain as operational infrastructure.</p> <p>The inclusion of KCA in the RSI Definition effectively prevents a potentially more appropriate use and development of the TKL Land for other purposes that would better enable people and communities to provide for their social, economic and cultural wellbeing and would better achieve the Urban Design Amendments, the Freshwater Amendments and the Indigenous Biodiversity Amendments. The site is ideally suited being bounded by urban development.</p>	Remove Kāpiti Coast Airport from the definition of regionally significant infrastructure.
S126.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Not Stated / Neutral	The TKL Land could implement the Urban Design Amendments.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S126.008	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	The TKL Land could implement the fresh water amendments.	Retain as notified.
S126.009	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	The TKL Land could implement the Indigenous Biodiversity Amendments.	Retain as notified.
S126.010	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Oppose in part	To support other submission point requesting the deletion of Kapiti Coast Airport from the definitions of Regionally Significant Infrastructure.	Amend 'Figure 3: Wellington Regional Growth Framework corridors', to remove the small aeroplane annotation just above the centre of the 'Western Growth Corridor - Tawa to Levin'.

S98 Teresa Homan

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S98 Teresa Homan					
S98.001	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Supports low rise intensification of housing across the Wellington region and specifically in Upper Hutt. Housing should be on identifiable available urban and rural land not used for production of food. However, recognises a need to limit housing based on population growth and fluctuation.	Add provision(s) which consider the effect that overinflated housing can have on the health and welfare of current and future residents and undue strain on the regions infrastructure.
S98.002	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	All public transport needs to be connected and subsidised by central government, regional council and local territorial authorities. There is no need for housing to be concentrated near rail if other forms of public transport are connected such as buses to trains, inner city shuttle services.	Amend provisions to address relief sought.
S98.003	Chapter 3.9: Regional	General comments -	Support	Supports improved cycle tracks (active transport routes).	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	form, design and function	urban development			
S98.004	Chapter 3.9: Regional form, design and function	General comments - urban development	Support	Supports affordable housing provisions.	Retain as notified.
S98.005	Chapter 4.3: Allocation of responsibilities	General comments - allocation of responsibilities	Support	All district plans need to identify natural taonga and heritage sights examples peat swamps, native trees, forest, birds, native fish.	Amend provisions to address the relief sought in the submission.
S98.006	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support	Te Awa Kairangi and all water catchments must be protected and revitalised as priority in any district plan.	Amend provisions to address relief sought in submission.

S120 The Retirement Villages Association of New Zealand

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S120 The Retirement Villages Association of New Zealand					
S120.001	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Oppose	Policy CC.2 creates uncertainty by shifting this requirement to district plan level, leaving the potential for individual district plans to set potentially varying thresholds. There is also uncertainty created through the use of 'more than minor' and related to the ongoing monitoring and enforcement of travel demand management plans.	Delete Policy CC.2.
S120.002	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and	Support in part	Policy CC.14 lists a range of actions that will contribute to climate resilient urban areas. Linking those to a well-functioning urban environment broadens that existing	Amend Policy CC.4 as follows: Policy CC.4 Climate resilient urban areas - district and regional plans (FPP) District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		regional plans		definition as set out in Policy 1 of the NPS-UD and is not required.	areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.
S120.003	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	<p>Objective 22 seeks to enable urban development where it "demonstrates the characteristics and qualities of well-functioning urban environments, which" and then lists a range of matters. Each matter is linked with an 'and' thereby creating a requirement that urban development achieves each of the listed matters before the objective would consider the urban development to be enabled.</p> <p>Policy 1 of the NPS-UD defines a 'well-functioning urban environment'. If the objective is seeking to define a well-functioning urban environment then the definition of the NPS UD should be the starting point. The policy has the effect of adding 11 additional aspects that would need to be addressed to consider a proposal to be a well-functioning urban environment. This is inconsistent with the intent of Policy 1 of the NPS-UD.</p>	<p>Amend Objective 22 as follows:</p> <ul style="list-style-type: none"> Remove the 'and' following each listed matter; Be based on the definition of 'well-functioning urban environment' as defined in Policy 1 of the NPS-UD; and Remove superfluous matters that are otherwise addressed by the RPS or NPS-UD.
S120.004	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	<p>Policy 55 extensively adds to the definition of a well-functioning urban environment, particularly through matter (ii). Matter (ii) cross-references to other topic areas of the RPS that are otherwise relevant considerations and do not need to be included here.</p>	<p>Amend the policy as follows:</p> <p>"When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region's urban areas (as at August 2022), particular regard shall be given to whether:</p> <p>(a) The urban development contributes to establishing or maintaining the qualities of a well-functioning urban environment., including: (i) the urban development will be well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors; (ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or</p>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					<p>resources identified by this RPS, including: 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29, 2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23, 3. Protecting outstanding natural features and landscape values as identified by Policy 25, 4. Protecting historic heritage values as identified by Policy 22, 5. Integrates Te Mana o Te Wai consistent with Policy 42, 6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17.7. Recognises and provides for values of significance to mana whenua / tangata whenua, 8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and</p> <p>..."</p>
S120.005	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	<p>Policy 56 lists a range of considerations for the management of development in rural areas. Matter (a) relates to impacts on productive land. This matter may well have been overtaken by the introduction of the NPS on Highly Productive Soils and could be removed pending GWRC giving effect to the NPS.</p> <p>Matter (d) requires consideration of the consistency of a development with a Future Development Strategy or other growth strategy and is reflective of Policy 55 above. Matter (e) notes that in the absence of such a strategy consideration is required of the pressure development may put on existing services and infrastructure.</p> <p>While the policy mirrors Policy 55 in terms</p>	<p>Amend Policy 56 as follows:</p> <ul style="list-style-type: none"> • Re-considering whether matter (a) remains necessary as currently worded given the introduction of the NPS on Highly Productive Soils; • Remove duplication, or ensure consistency, between policies 55, 56 and UD.3.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				of reflecting consideration of growth strategies, it does not similarly reflect Policy 55 in considering 'out of sequence' development. Either the policy is intending to duplicate the matters in Policy 55 with respect to growth management in which case it should mirror all relevant aspects, or matters (d) and (e) should be removed and Policy 55 and UD.3 should be relied upon.	
S120.006	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Oppose in part	<p>Policy 58 is not consistent with Objective 6(c) and Policy 8 of the NPS-UD relating to being responsive to proposals that would bring about significant development capacity. It is not always possible to achieve all of the matters listed in Policy 58.</p> <p>The policy is internally inconsistent with proposed Policy 57(e) of the RPS which recognises that the timing and sequencing of land use and public transport may result in a period where public transport may not be practical.</p>	Delete Policy 58, or amend the policy to achieve consistency with Objective 6(c) and Policy 8 of the NPS-UD.
S120.007	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>Policy UD.3 lists a range of criteria which must be given particular regard when considering developments that provide for significant development capacity.</p> <p>Matter (a)(i) references the "characteristics and qualities of a well-functioning urban environment" as identified in Policy 55(a)(ii) and Objective 22. These matters have been addressed above.</p> <p>It is unclear what is meant by matter (c)(iv) of the policy and this matter should be clarified or deleted.</p>	<p>Amend Policy UD.3 as follows:</p> <ul style="list-style-type: none"> • Make consequential amendments that reflect the relief sought in respect of Objective 22 and Policy 55 outlined above; or • Deleting the words "identified in Policy 55(a)(ii) and Objective 22" from Policy UD.3(a)(i); • Delete or clarify matter (c)(iv).

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S132 Toka Tu Ake EQC					
S132.001	Chapter 3.1A: Climate change	Objective CC.6	Support	Support increasing the resilience of communities to climate change by adaptation planning	No Change
S132.002	Chapter 3.8: Natural hazards	Objective 19	Support	We support the objective of minimizing the risks of natural hazards.	No Change
S132.003	Chapter 3.8: Natural hazards	Objective 21	Support	We support increasing the resilience of communities to natural hazards, including the increase in risk likely to be caused by climate change.	No Change
S132.004	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	It is important that urban development is enabled in areas which are at minimal risk from natural hazards, and that development is appropriately resilient to both current and future risks from natural hazards, accounting for the effects of climate change.	Add:!) minimise the exposure of residents to natural hazards, and account for future natural hazard risk increased by the effects of climate change
S132.005	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	It is important that district councils effectively manage natural hazard risks and the effects of climate change in implementing the recent NPS-UD. As such it would be helpful for the RPS to include guidance on how to implement climate and natural hazard resilience in urban areas.	Strengthen, especially regards areas intensified through the NPS-UD. As "climate resilient urban areas" is defined as urban environments which have the ability to withstand the impacts of increased natural hazards due to the impact of climate change, this should be explicitly worded in the policy.
S132.006	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	As above	Strengthen, especially regards areas intensified through the NPS-UD
S132.007	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards -	Support in part	We support minimizing the risk from natural hazards by avoiding new or further residential development in areas most at risk. Guidance should be provided to district and city councils on which situations constitute high risk from natural hazards.	Strengthen, change to: "Avoid subdivision, use and development in areas at high risk from natural hazards and manage in areas of lower risk" Add guidance on what constitutes low, medium, and high natural hazard risk, to avoid inconsistent application of these terms in district

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		district and regional plans			plans
S132.008	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	We support minimizing the risks from natural hazards by land use planning and regional policies.	No Change
S132.009	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	When natural hazard mitigation measures are put into place, it is important that these measures do not increase the natural hazard risk in other areas or in the future.	No Change
S132.010	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support	Appropriate urban expansion and intensification should be zoned for areas which are at minimal risk from natural hazards, including predicted increase in risk from climate change. The RPS could assist in regulating how urban expansion progresses by providing policies on where it is appropriate.	Strengthen, require urban development and intensification to be zoned outside of areas at high risk of natural hazards, or areas which will become high risk due to the impacts of climate change. As with Policy 29, guidance on what constitutes high risk should be provided.
S132.011	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support	We support increased research into natural hazards and the effects of climate change. Resilience of communities to hazards is reliant on the community understanding of the hazards. As such we encourage increasing public education and awareness of this research.	No Change
S132.012	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Support in part	It is important that policies to increase resilience to natural hazards and the effects of climate change are consistently applied throughout the region. As such we recommend that the Regional Council provide guidance on identification of high risk areas and application of the policies in this RPS.	Re-instate the phrase: "Prepare and disseminate information about how to identify areas at high risk from natural hazards, as relevant to the development of hazard management strategies to guide decision-making"

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S95 Tony Chad					
S95.001	General comments	General comments - overall	Support	Supports the Proposed Change 1 to the RPS for Wellington Region in its entirety	Retain as notified, with some suggested amendments.
S95.002	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	Finite planet with finite resources = finite growth. Te Awa Kairangi is exhibiting symptoms of having reached its limit for extraction. This would logically mean that growth and development should be curtailed until the health of the awa is restored.	Include mention of 'Limits to Growth'
S95.003	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	Central government is too slow to rein in carbon emitting agriculture	Require Regional Plans to have Carbon Reduction Plans (CRPs)
S95.004	General comments	General comments - overall	Support in part	Central Government is too slow to rein in carbon emitting agriculture	Require Regional Plans to have Carbon Reduction Plans (CRPs)
S95.005	Appendix 3: Definitions	General comments - definitions	Support in part	UHCC Plan Change 47 includes the Mangaroa Peatland as unstable for development. This should be reflected in Plan Change 1 to the RPS. By adopting the RAMSAR definition of a wetlands, the Mangaroa Peatland would qualify for protection and restoration.	Use the RAMSAR Convention definition to define wetlands (Article 1) as this incorporates peatlands as follows: "areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres."
S95.007	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Conservation first must lead all future resource use decisions. Councils must 'teach', encourage and support conservation practices especially for land, water, energy.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S95.008	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	Council must empower people to create and manage their own resources, especially water and energy. This can lead to greater resilience and sense of security if people know what they are currently doing, and what they can do to change their resource use profile.	Include references to personal resource audits and other tools to raise awareness and use to create a PRMP (Personal Resource Management Plan).
S95.009	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	Rain water harvesting and storage and renewable generation must be normalised.	Retain as notified.
S95.010	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Work with Ministry of Education and NZQA to include Environmental Studies at all levels of schooling with standards for assessment on the qualifications framework .
S95.012	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Local councils should create a new committee for Water Strategy in order to more easily draft policy at the local level.
S95.013	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	Municipal swimming pools must have roof top solar energy generation and/or solar hot water heating to reduce the high energy use for heating the water.	Amend policy to require that all appropriate council owned buildings must be considered as renewable energy generation sites.
S95.014	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Municipal swimming pools must have storm water collection and storage facility, in ground, under car parks to be used to fill the pool or as emergency water supply.	Amend policy to require storm water collection and storage facilities (in ground), and under car parks to be used to fill municipal swimming pools or as emergency water supply.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S95.015	General comments	General comments - overall	Not Stated / Neutral	Not stated.	Change the building code to make rain water collection and storage tanks, meters for reticulated water, storm water for toilet flushing, on site renewable energy generation or community generation, and triple glazing in certain areas, and WOF for all septic systems in rural areas.

S84 Tony Randle

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S84 Tony Randle					
S84.001	General comments	General comments - overall	Oppose in part	Proposed Change 1 to the Regional Policy Statement for the Wellington Region is both complex and difficult to understand.	Requests additional time to consider proposed changes.

S10 Transpower New Zealand Limited

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S10 Transpower New Zealand Limited					
S10.001	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	<p>Transpower supports Policy 7 recognising the importance of transmission infrastructure that distributes renewable or zero/low carbon energy. The proposed changes to Policy 7 introduce the term "low and zero carbon". The term "low or zero carbon" has not been defined and it is unclear what it is intended to mean, particularly in the context of "low and zero carbon regionally significant infrastructure" in Policy 7.</p> <p>As the policy covers several rather distinct elements, it would be clearer if different elements could be more clearly articulated and distinguished within the existing Policy 7. Transpower notes that the policy refers to people having access to energy and</p>	<p>Clarify the term "low and zero carbon", particularly in relation to regionally significant infrastructure, and how it is applied.</p> <p>Amend Policy 7 to recognise and provide for electricity transmission. Transpower requests the insertion of a new (a)(iv): (iv) the provision of an efficient and effective electricity transmission system; and</p>

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				requests specific recognition be included in the policy of the transmission system required to enable that access to energy. Such policy recognition would give effect to Policy 1 of the NPSET.	
S10.002	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	Transpower is concerned that the amendments to Policy 24 are overly broad in their application and potentially impractical to implement in practice. They do not recognise that some infrastructure has a functional or operational need to be constructed or operated in certain locations. In some situations this may mean that biodiversity offsetting or biodiversity compensation is required. Furthermore, Appendix 1A is very extensive in the ecosystems and specifies it applies to.	Amend Policy 24 to recognise that regionally significant infrastructure may have a functional or operational need to locate in a particular location. This could be achieved by adding a qualifying statement: This does not apply to nationally and regionally significant infrastructure that has a functional or operational need to locate in a particular location. In the case of the National Grid, following a route, site and method selection process and having regard to the technical and operational constraints of the network, new development or major upgrades of the National Grid shall seek to avoid adverse effects, and otherwise remedy or mitigate adverse effects, on ecosystems or habitats with significant indigenous biodiversity values.
S10.003	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Policy 29 would benefit from clarification of what is meant by a 'low', 'moderate', 'high' or 'extreme' hazard or risk. The use of "low to moderate" in (c) and "high to extreme" in (d) makes it unclear whether it means low or moderate or a separate category of 'low to moderate'. Policy 29 drafting indicates (d) only applies where both hazards and risks are high to extreme, so an activity could locate in a high hazard area if the risk was moderate. However, this also needs clarification.	Define the terms used in Policy 29 or provide the reader with guidance. For example, in the Explanation, on where definition of these terms can be found. Clarify the wording of Policy 29 in relation to hazards and risks and different hazard and risk levels or categories.
S10.004	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and	Support in part	As for Policy 7, Policy 39 covers several rather distinct elements. While Transpower does not oppose the addition of the text in (a) referencing reducing greenhouse gas emissions, Transpower submits clause d) of the policy could benefit from greater	Amend Policy 39(d) to recognise high voltage electricity transmission. (d) significant wind, solar and marine renewable energy resources within the region and the operation,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		regionally significant infrastructure - consideration		recognition of the need for transmission of the energy and electricity generation. Such reference would give effect to the NPSET.	maintenance, upgrade and development of the electricity transmission network to support the transmission of the renewable energy resource.
S10.005	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support	Transpower supports the inclusion of (a)(ii)(8) "Protecting Regionally Significant Infrastructure as identified by Policy 8", noting the importance of protecting regionally significant infrastructure from reverse sensitivity effects and that the NPS-UD 3.32(1)(c) and RMA Section 771(e) identify any "matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure" as a 'qualifying matter'.	Retain Policy 55(a)(ii)(8).
S10.006	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	Transpower considers that it is important to provide policy direction to enable the infrastructure to support the urban development. The RPS would benefit from policy supporting the regionally significant infrastructure that is required to support urban development. Transpower considers that this would be best achieved by amending Policy 7 as requested elsewhere in this submission.	Retain Policy 58, but amend Policy 7 to provide direction supporting the regionally significant infrastructure that is required to support urban development.
S10.007	Appendix 3: Definitions	National grid	Support in part	While Transpower supports the provision of a definition of National Grid, it seeks amendment to the definition to refer to that provided within the National Policy Statement for Electricity Transmission 2008.	Amend the definition of National Grid as follows: National grid as defined by the Electricity Industry Act 2010 . National Policy Statement for Electricity Transmission 2008.
S10.008	Appendix 3: Definitions	Regionally significant infrastructure	Support	Transpower supports the amended definition of Regionally Significant Infrastructure as it relates to the National Grid.	Retain the amended definition.

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S89 VicLabour					
S89.001	Chapter 3.1A: Climate change	General comments - climate change	Support	Support Chapter 3.1A to set a regional direction on adapting to climate change. Immensely aware of the problems that climate change will cause for our generation. From extreme weather events to food and energy insecurity and more, we believe that it is critical GWRC plays its part in creating a climate-positive and environmentally friendly region.	Retain as notified.
S89.002	Chapter 3.1A: Climate change	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support	Support objectives outlined in Table 1A. These are measurable and realistic goals that believe the Wellington region can work towards and will help to secure our future in the face of a warming climate	Retain as notified.
S89.003	Chapter 3.1A: Climate change	Objective CC.1	Support	Support objectives CC.1(b) and CC.1(c) as these are incredibly important for our young people - we need to have suitable infrastructure that is going to stand the test of time, alongside well-functioning urban areas. People need to be able to live their lives in the way they want. Every infrastructure decision we make must be future focused. Without that, we will continue to see decline. Objective CC.1(c) will help protect that longevity. It's also critical that we provide reason for people to see our city centres as good places to live, and well-functioning urban environments will do exactly that.	Retain as notified.
S89.004	Chapter 3.1A: Climate change	Objective CC.2	Support	Support Objective CC.2 which pushes Wellington towards being a low-emission city. It's incredibly important to ensure public transport and green travel is held as a priority. It is important to have accessible, cheap, and efficient alternatives to driving.	Retain as notified.
S89.005	Chapter 3.9: Regional form,	General comments - urban development	Support	Support recognition of the lack of housing Wellington has in the modifications to Chapter 3.9, particularly regarding the lack of variety of housing (i.e.: papakāinga).	Retain as notified.

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	design and function			Support ensuring that the housing in Wellington is diverse and built denser, otherwise we will never be able to sustain being the "green" region we desire to be. This does not just apply to Wellington City, but it applies everywhere across the region.	
S89.006	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	Support Policy 31 mentioning the enabling of a range of building heights and density, but urge considering whether this language or structure in the policy will suffice in creating a good enough "dense housing" mandate. Notes that Policy 31(c) may cover this.	Amend Policy 31 to address the relief sought in the submission.
S89.007	Chapter 3.4: Fresh water (including public access)	Objective 12	Support	Support the structure of the three priorities in Objective 12 (Table 4), especially considering that the health and well-being of water bodies and freshwater ecosystems should always be our first priority. Without healthy waterways, we do not have healthy water, and therefore we do not have healthy people.	Retain as notified.
S89.008	Chapter 3.4: Fresh water (including public access)	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Support wording "joint decision-making between tangata whenua and GWRC for all decisions about our waterbodies". Support engaging with tangata whenua at the decision-making table, and them being able to make the decisions alongside GWRC, will result in better outcomes for our waterways	Retain as notified.
S89.009	General comments	General comments - overall	Support	Support the overall proposed Regional Policy Statement changes and supports direction in the space of climate, urban development, and freshwater to ensure that we are heading towards being a climate-friendly and low-emissions city, alongside genuinely abiding by our Te Tiriti obligations.	Retain as notified.

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S163 Wairarapa Federated Farmers					
S163.001	General comments	General comments - overall	Oppose	Concerns that Plan Change 1 to the RPS includes climate change provisions which have been notified in advance of amendments to the RMA which do not come into effect until 30 November 2022; and that it includes biodiversity provisions which seek to pre-empt the upcoming National Policy Statement for Indigenous Biodiversity (NPS-IB). Freshwater issues were to be addressed comprehensively as part of the full RPS review scheduled for 2024.	RPS Change One should not include provisions relating to climate change, biodiversity and water. The scope of RPS Change One should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development. Any other matters should be subject to proper review in the scheduled full review of the Regional Policy Statement in 2024; and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024.
S163.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	General comments - Chapter 3	Oppose	The over-arching resource management issues and objectives in this chapter would more properly be considered in the full review of the RPS scheduled in 2024.	All proposed amendments to Chapter 3 be deleted
S163.003	Chapter 3: Resource management issues, objectives and summary of policies and methods	General comments - Chapter 3	Oppose	Disagree that the proposed amendments to Chapter 3 should be treated as "freshwater" instruments: instead their intention and application is as "integrative" provisions, as per recent case law (see submission for more detail).	Delete FW icons

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	to achieve the objectives in the Regional Policy Statement				
S163.004	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1: Adverse impacts on natural environments and communities	Oppose	<p>A review of Chapter 3 should be deferred to the full review of the RPS in 2024. Disagree with the content and scope of the issues in Chapter 3 for the reasons set out in the submission.</p> <p>If the review of Chapter 3 is not deferred, alternative content for issues is required, which speak to the importance of people and strengthening the connections between people and place, integrated catchment management and climate change. This includes the creation of an issue that addresses the challenge of "giving back to the wai, while we utilise her waters to sustain our people" and an issue that addresses the implications for farmers - and the wider regional economy - of unreliable and uncertain access to water to sustain their enterprises and livelihoods. Further detail provided in the submission.</p>	<p>Delete Overarching Issue 1 OR Add a new overarching issue to the following or similar effect: sustain and accelerate the multi-agency delivery platforms for empowering catchment communities for collective action and mutual support to address the twin challenges of improving environmental outcomes and sustaining thriving economies and connected communities.</p> <p>OR Add a new overarching issue to the following or similar effect:accelerate the multi-agency delivery platforms to address the looming water supply-demand gap, ie, giving back to the wai, while sustaining the people.</p>
S163.005	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Oppose	<p>A review of Chapter 3 should be deferred to the full review of the RPS in 2024. Disagree with the content and scope of the issues in Chapter 3 for the reasons set out in the submission.</p> <p>If the review of Chapter 3 is not deferred, alternative content for issues is required, which speak to the importance of people and strengthening the connections between people and place, integrated catchment management and climate change. This includes the creation of an issue that addresses the challenge of</p>	<p>Delete Overarching Issue 2 OR Add a new overarching issue to the following or similar effect:sustain and accelerate the multi-agency delivery platforms for empowering catchment communities for collective action and mutual support to address the twin challenges of improving environmental outcomes and sustaining thriving economies and connected communities. OR Add a new overarching issue to the following or</p>

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	objectives in the Regional Policy Statement			"giving back to the wai, while we utilise her waters to sustain our people" and an issue that addresses the implications for farmers - and the wider regional economy - of unreliable and uncertain access to water to sustain their enterprises and livelihoods. Further detail provided in the submission.	similar effect: accelerate the multi-agency delivery platforms to address the looming water supply-demand gap, ie, giving back to the wai, while sustaining the people.
S163.006	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 3: Lack of mana whenua / tangata whenua involvement in decision making	Oppose	<p>A review of Chapter 3 should be deferred to the full review of the RPS in 2024. Disagree with the content and scope of the issues in Chapter 3 for the reasons set out in the submission.</p> <p>If the review of Chapter 3 is not deferred, alternative content for issues is required, which speak to the importance of people and strengthening the connections between people and place, integrated catchment management and climate change. This includes the creation of an issue that addresses the challenge of "giving back to the wai, while we utilise her waters to sustain our people" and an issue that addresses the implications for farmers - and the wider regional economy - of unreliable and uncertain access to water to sustain their enterprises and livelihoods. Further detail provided in the submission.</p>	<p>Delete Overarching Issue 3</p> <p>OR</p> <p>Add a new overarching issue to the following or similar effect:sustain and accelerate the multi-agency delivery platforms for empowering catchment communities for collective action and mutual support to address the twin challenges of improving environmental outcomes and sustaining thriving economies and connected communities.</p> <p>OR</p> <p>Add a new overarching issue to the following or similar effect:accelerate the multi-agency delivery platforms to address the looming water supply-demand gap, ie, giving back to the wai, while sustaining the people.</p>
S163.007	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the	Overarching Objective A	Oppose	Propose new objectives for the reasons set out in relation to the issues (more detail provided in the submission). The key outcome sought is a delay in changes to Chapter 3 and the suggested objectives only included if Plan Change 1 is to proceed with the same scope as notified.	<p>That Objective A be deleted</p> <p>Alternatively, insert an overarching objective to the following or similar effect to emphasise strengthening the connections between people and place, hapu and community, matauranga and data, putaiao and innovation:Objective A: catchment communities are enabled and empowered to collaborate in working together to support the mana of the land and the water and the people who live and work within.</p> <p>And/or a new objective to the following or similar effect to address the looming water supply-demand</p>

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	objectives in the Regional Policy Statement				gap: Objective B: catchment communities are enabled and empowered to develop and prototype weaving together nature-based and built solutions for respecting and sharing water. Suggestions for possible content for consequential policies and methods is included in the submission.
S163.008	Chapter 3.1A: Climate change	General comments - climate change	Oppose	Climate change issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024.	That the proposed insertion of Chapter 3.1A be rejected
S163.009	Chapter 3.1A: Climate change	General comments - climate change	Oppose	Disagree that the proposed climate change provisions are freshwater instruments, instead their intention and application is as "integrative" provisions, as per recent case law (see submission for more detail).	Delete FW icons
S163.010	Chapter 3.1A: Climate change	Climate change introductory text	Oppose	Oppose the climate change introduction text on the basis that Plan Change 1 was notified in advance of the repeal of the statutory bar in the RMA in respect of local authority roles in climate change matters. Consider that national direction on climate change should be introduced prior to any changes to the RPS addressing climate change matters and that the scheduled 2024 RPS review is the appropriate time for climate change provisions to be inserted (see submission for more detail).	Delete climate change introductory text
S163.011	Chapter 3.1A: Climate change	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Oppose	Defer to the full review of the RPS in 2024.	Delete Table 1A OR Amend objectives and policies in Table 1A as per details in submission and make consequential amendments to related methods.

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S163.012	Chapter 3.1A: Climate change	Objective CC.1	Oppose	Defer to the full review of the RPS in 2024 for the reasons set out in relation to general comments on the climate change chapter.	That Objective CC.1 be deleted.
S163.013	Chapter 3.1A: Climate change	Objective CC.2	Oppose	This objective has not been drafted as part of a well-paced, well-planned, well-signalled and co-designed plan change and consultation prior to notification was restricted to the statutory minimum. More specific reasons are included in the submission.	That Objective CC.2 be deleted
S163.014	Chapter 3.1A: Climate change	Objective CC.3	Oppose	Defer to the full review of the RPS in 2024. Concerned that Council seeks to introduce targets which do not reflect and are not referenced in the Zero Carbon Act (specifically the Zero Carbon Act split gas targets). Targets should be central government led, not set by individual councils. More reasons are set out in the submission.	That Objective CC.3 be deleted
S163.015	Chapter 3.1A: Climate change	Objective CC.4	Oppose	A wider portfolio of tools is required than just "nature-based solutions", including constructed or engineered solutions and technological developments. Nature-based solutions may also integrate both "natural" and "constructed" elements, eg, in the case of water storage. The proposed new over-arching Objective B is intended as a practical pathway towards a similar result.	That Objective CC.4 be deleted Delete the FW icon
S163.016	Chapter 3.1A: Climate change	Objective CC.5	Oppose	The intent of this objective should be to optimise an increase in forests/trees across diverse values and uses (e.g. permanent or plantation forests, continuous canopy forests, agro-forestry), rather than maximise any one element.	That Objective CC.5 be deleted Delete the FW icon
S163.017	Chapter 3.1A: Climate change	Objective CC.6	Oppose	Agree with intent, however the alternate over-arching Objective A and Objective B are preferred as these provide more concrete objectives and pathways to achieve a similar result.	That Objective CC.6 be deleted
S163.018	Chapter 3.1A: Climate change	Objective CC.7	Oppose	Agree with intent, however the alternate over-arching Objective A and Objective B are preferred as these provide more	That Objective CC.7 be deleted

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				concrete objectives and pathways to achieve a similar result.	
S163.019	Chapter 3.1A: Climate change	Objective CC.8	Oppose	Agree with intent, however the alternate over-arching Objective A and Objective B are preferred as these provide more concrete objectives and pathways to achieve a similar result.	That Objective CC.8 be deleted.
S163.020	Chapter 3.3: Energy, infrastructure and waste	General comments - energy, infrastructure and waste	Oppose	Energy, infrastructure and waste issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024.	That the proposed amendments to Chapter 3.3 be deleted
S163.021	Chapter 3.3: Energy, infrastructure and waste	Table 3	Oppose	Defer to the full review of the RPS in 2024. The proposed amendments are principally tinkering with words; and not adding much of value which could not be more properly addressed in 2024.	Delete all provisions
S163.022	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Oppose	Freshwater issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024; and in a RPS Change specific to water in parallel with the NRP Change scheduled for urban whitua in 2023.	That the proposed amendments to Chapter 3.4 be deleted
S163.023	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Oppose	Amendments to this text should be considered as part of planned regional plan changes in 2023 (urban whitua) and 2024 (rural whitua) to give effect to the NPS-FM; in addition to the scheduled review of the RPS in 2024 (and potentially an additional review of the RPS in 2023 to align with NRP changes at that time). See submission for more detail.	Delete the proposed amendments to the introduction.
S163.024	Chapter 3.4: Fresh water (including public access)	Table 4	Oppose	Defer to the upcoming plan changes in 2023 for urban whitua, and 2024 for rural whitua.	Delete Table 4 OR Amend objectives and policies in Table 4 as per details in submission and make consequential amendments to related methods.
S163.025	Chapter 3.4: Fresh water (including	Objective 12	Oppose	Defer to the upcoming plan changes in 2023 for urban whitua, and 2024 for rural whitua. See submission for more details.	Delete the amendments to Objective 12.

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	public access)				
S163.026	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Oppose	Indigenous ecosystem issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024, informed by the upcoming NPS for Indigenous Biodiversity (NPS-IB).	That the proposed amendments to Chapter 3.6 be deleted
S163.027	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Oppose	Do not agree that any of the proposed indigenous ecosystem provisions are freshwater instruments, refer to submission for further information about relevant case law.	Delete FW icons
S163.028	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems introductory text	Oppose	Defer to the full review of the RPS in 2024, at which time the introduction can be informed by careful analysis and interpretation of up-to-date regional state of the environment data. Refer to submission for more detail.	Delete the proposed amendments to the introduction. Delete the FW icon
S163.029	Chapter 3.6: Indigenous ecosystems	Table 6(a)	Oppose	Defer to the full review of the RPS in 2024.	Delete Table 6A OR Amend objectives and policies in Table 6A as per details in submission and make consequential amendments to related methods. Delete FW icons
S163.030	Chapter 3.6: Indigenous ecosystems	Objective 16	Oppose	Defer to the full review of the RPS in 2024. The proposed amendments are "muddying" an RMA s6 matter, ie, the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna	That the amendments to Objective 16 be deleted. To the extent amendments are made, delete the FW icon
S163.031	Chapter 3.6: Indigenous ecosystems	Objective 16A	Oppose	Defer to the full review of the RPS in 2024.	That Objective 16A be deleted. Delete the FW icon

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S163.032	Chapter 3.6: Indigenous ecosystems	Objective 16B	Oppose	Defer to the full review of the RPS in 2024.	That Objective 16B be deleted. Delete the FW icon
S163.033	Chapter 3.8: Natural hazards	General comments - natural hazards	Oppose	Natural Hazards issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024. The proposed amendments are principally tinkering with words; and not adding much of value which could not be more properly addressed in 2024.	That the proposed amendments to Chapter 3.8 be deleted
S163.034	Chapter 3.8: Natural hazards	General comments - natural hazards	Oppose	Do not agree that any of the proposed natural hazard provisions are freshwater instruments, refer to submission for details on relevant case law.	Delete FW icons
S163.035	Chapter 3.8: Natural hazards	Table 8(a)	Oppose	Defer to the full RPS review in 2024.	Delete Table 8A OR Amend objectives and policies in Table 8A as per details in submission and make consequential amendments to related methods.
S163.036	Chapter 3.8: Natural hazards	Objective 19	Oppose	Defer to the RPS review in 2024	Delete the proposed amendments
S163.037	Chapter 3.8: Natural hazards	Objective 20	Oppose	Defer to the RPS review in 2024	Delete the proposed amendments Delete the FW icon
S163.038	Chapter 3.8: Natural hazards	Objective 21	Oppose	Defer to the RPS review in 2024	Delete the proposed amendments
S163.039	Chapter 3.9: Regional form, design and function	General comments - urban development	Oppose	The National Planning Standards direct that Regional Policy Statements should include a chapter on urban form and development. Consistent with this direction, the existing chapter introduction and the proposed amendments to it (to give effect to the NPS for Urban Development) are all clearly directed to urban areas.	That the Chapter 3.9 title be amended to read Regional Urban form, design and function OR Urban form and development

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S163.040	Chapter 3.9: Regional form, design and function	General comments - urban development	Oppose	Do not agree that any of the proposed regional form, design and function provisions are freshwater instruments, refer to submission for details of relevant case law.	Delete FW icons
S163.041	Chapter 3.9: Regional form, design and function	Objective 22B	Oppose	This proposed new objective relating to development in rural areas does not fit in this chapter which is focused on urban areas; and as currently structured is uncertain in its intent and application. If the intent is to manage rural residential development then the objective should be reworded to reflect this. See submission for more details.	That Objective 22B be deleted OR Insert a clause in Objective 22 to the following or similar effect: provide for rural residential development in appropriate locations Delete the FW icon
S163.042	Chapter 4.1: Regulatory policies	General comments - regulatory policies	Oppose	The proposed amendments to regulatory policies would more properly be considered in the full review of the RPS scheduled in 2024. Additional reasons are as set out in respect of the objectives for each topic.	That the proposed amendments to Chapter 4.1 be deleted
S163.043	Chapter 4.1: Regulatory policies	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Oppose	Concerned that one region adopting new regulatory settings (over and above the ETS) may result in perverse consequences (eg, activities transferring or 'leaking' to another region). Refer to submission for more detail.	That the amendments to Policy 2 be deleted
S163.044	Chapter 4.1:	Policy CC.1: Reducing greenhouse	Oppose	Defer to the full RPS review in 2024. Accepting the intent to optimise urban	That Policy CC.1 be deleted

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Regulatory policies	gas emissions associated with transport infrastructure - district and regional plans		transport infrastructure, we point out that mode-shift is not a practical option in rural areas, nor for heavy vehicles. See submission for more detail.	
S163.045	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Oppose	Defer to the full RPS review in 2024. Accepting the intent to optimise urban transport infrastructure, we point out that mode-shift is not a practical option in rural areas, nor for heavy vehicles. See submission for more detail.	That Policy CC.2 be deleted.
S163.046	Chapter 4.1: Regulatory policies	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	Concerned with the "avoid increase" directive for agricultural greenhouse gas emissions, particularly when other sectors are not subject to similar policies (e.g. industry and transport). Concerned that this policy may result in perverse outcomes, eg, landuse change from pastoral farming to other uses could see a reduction in short-lived agricultural emissions, but an increase in long-lived carbon dioxide emissions. Refer to submission for more detail.	That Policy CC.5 be deleted.
S163.047	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	Defer to the full review of the RPS in 2024. This policy is pre-empting policy development which is in process at the national level. Refer to submission for significant detail on the challenge of managing forestry.	That Policy CC.6 be deleted Delete the FW icon.
S163.048	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems	Oppose	Defer to the full review of the RPS in 2024. Concerned that "nature based solutions" are not explicitly exempt from being "significant natural areas" (SNAs) in RPS Change One and that regulatory	That Policy CC.7 be deleted Delete the FW icon

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		and habitats that provide nature-based solutions to climate change - district and regional plans		roadblocks to beneficial nature-based solutions have not been addressed. Refer to submission for more details.	
S163.049	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	Defer to the full review of the RPS in 2024	That Policy CC.8 be deleted
S163.050	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Oppose	Defer to the full review of the RPS in 2024 Policy 7 and the definition of RSI include reference to municipal water supply and drinking water, but do not more widely recognise the critical role of water supply infrastructure across all regional sectors (including industry and primary production) and at all scales (regional, municipal, community, farm-scale). Refer to submission for more details.	That the amendments to Policy 7 be deleted
S163.052	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Oppose	Defer to full review of the RPS in 2024 Refer to submission for more detail on partnership principles.	That the amendments to Policy 12 be deleted
S163.053	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance -	Oppose	There are currently no limits for suspended sediment -or indeed any other attribute - in this region pending the upcoming plan changes in 2023 (urban) and 2024 (rural). The appropriate time to consider provisions for meeting any such limits will be in those	That the amendments to Policy 15 be deleted.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		district and regional plans		plan changes. Refer to submission for more detail.	
S163.054	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	Defer to full review of the RPS in 2024. The health needs of people (drinking water and basic sanitation) are only a portion of municipal takes: as currently written, the policy implies all takings of water by statutory authorities.	That the amendments to Policy 17 be deleted
S163.055	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Defer to full review of the RPS in 2024	That the amendments to Policy 18 be deleted
S163.056	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Oppose	Defer to full review of the RPS in 2024 Considers that these matters were very recently the subject of mediated agreements during the pNRP hearing and that this policy is relitigating the same issues.	That Policy FW.1 be deleted
S163.057	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Oppose	Defer to full review of the RPS in 2024 Considers that these matters were very recently the subject of mediated agreements during the pNRP hearing and that this policy is relitigating the same issues.	That Policy FW.2 be deleted
S163.058	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and	Oppose	The case for urgent identification and evaluation of habitats with significant indigenous biodiversity values by 30 June 2025 has not been made and will likely to be a waste of effort and resources doing such assessment in advance of a National Policy Statement on Indigenous Biodiversity.	That the amendments to Policy 23 be deleted Delete the FW icon.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		regional plans			
S163.059	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>Concern that these matters have very recently been the subject of mediated agreements during the pNRP Hearing and are being relitigated through RPS Change One.</p> <p>Concern that this provision is more ambitious and precautionary than the exposure draft of the NPS-IB and that there is almost a blanket prohibition on offsets. Other concerns include that this policy may be significantly at odds with aspirations to increase "nature based solutions" (NBS), eg, creating or restoring wetlands and that offsets cannot be proposed in any forest remnants outside the Tararuas. Refer to submission for more detail on other concerns with this policy.</p>	That the amendments to Policy 24 be deleted Delete the FW icon
S163.060	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Oppose	Defer to full review of the RPS in 2024	That the amendments to Policy IE.1 be deleted Delete the FW icon
S163.061	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and	Oppose	<p>Defer to full review of the RPS in 2024</p> <p>This area was the subject of recent mediation in the pNRP hearings and the rationale for re-litigating in RPS Change One is not clear.</p>	That the amendments to Policy 29 be deleted

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		regional plans			
S163.062	Chapter 4.2: Matters to be considered	General comments - consideration policies	Oppose	The proposed amendments to regulatory policies would more properly be considered in the full review of the RPS scheduled in 2024. Additional reasons are as set out in respect of the objectives for each topic.	That the proposed amendments to Chapter 4.2 be deleted
S163.063	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Oppose	As set out in our reasons in respect of amendments to Chapter 3 - over-arching issues and objectives. The reference to "partner" is not supported for the reasons set out in Policy 12.	That Policy IM.1 be deleted Delete the FW icon.
S163.064	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Oppose	The purpose and principles of the RMA do not require considerations of 'equity' or 'inclusiveness' when considering plan changes or resource consent applications; and would practically be unworkable, especially at the level of resource consents. Refer to submission for more details.	That Policy IM.2 be deleted. Delete the FW icon.
S163.065	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Oppose	This policy is inappropriate for rural production and rural living areas where public transport or 'active modes' are non-existent. Requiring this policy to apply to such land would serve no purpose other than to require additional assessment for these matters that would produce the same conclusion i.e., that public transport or 'active modes' are non-existent or impractical in rural areas.	That Policy CC.9 be deleted.
S163.066	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate	Oppose	The proposed definition of "nature based solutions" refers specifically to the actions people take (eg, planting trees) and not to the trees themselves, ie, the policy seems confused on this point. To the extent that Council's intent is look after the trees (and wetlands etc), we suggest these are already comprehensively covered by existing regional and national RMA	That Policy CC.12 be deleted Delete the FW icon.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		change - consideration		instruments.	
S163.067	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	Reasons as set out in respect of the proposed climate change objectives and Policy CC.5 In addition, the directive in Policy CC.9 is expressed in terms of optimising planned developments in a way that contributes to reducing emissions (in respect of transport infrastructure): and Policy 2 is expressed in terms of support (in respect of industry): we are not clear why Policy CC.13 is expressed in different terms.	That Policy CC.13 be deleted
S163.068	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose	Reasons as set out in respect of Policy 7, specifically that the amendments do not provide for the social, economic, cultural, and environmental benefits of water storage infrastructure, in particular where it contributes to security of supply for municipal, industrial and primary production uses.	That the amendments to Policy 39 be deleted.
S163.069	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Reasons as set out in respect of the proposed objectives for freshwater.	That the amendments to Policy 40 be deleted.
S163.070	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	Defer to the full review of the RPS in 2024; and/or the NRP changes scheduled in 2023 and 2024, for reasons as set out in respect of Policy 15. Refer to submission for more detail.	That the amendments to Policy 41 be deleted.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S163.071	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	As set out in relation to objectives for freshwater. More specifically, any amendments should not apply to s14(3) takes. Refer to submission for more details on other specific concerns. Alternatively, the proposed new over-arching Objective B is intended to provide a pathway towards a similar result.	That the amendments to Policy 44 be deleted.
S163.072	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	Reasons as set out in respect of freshwater objectives. Concerned that the intent appears to be restricted to a concern for urban supplies and urban growth projections - and not rural supplies and primary production values. Refer to submission for more detail. The proposed over-arching Objective B is intended to provide a pathway towards a similar result.	That Policy FW.5 be deleted.
S163.073	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose	The amendments to Policy 47 are principally to add clause i) referencing Policy 24 (offsets). Refer to submission on Policy 24 for reasons as to why this policy should be deleted.	That the amendments to Policy 47 be deleted. Delete the FW icon.
S163.074	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose	Consider it is hugely inefficient to require that particular regard be given to exercise of mana whenua / tangata whenua role as kaitiaki for individual resource consent applications.	That Policy IE.2 be deleted. Delete the FW icon
S163.075	Chapter 4.2:	Policy 51: Minimising	Oppose	To the extent Council concern relates principally to future-proofing urban	That the amendments to Policy 51 be deleted. To the extent amendments to Policy 51 are made, delete

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Matters to be considered	the risks and consequences of natural hazards - consideration		developments (high density, high capital and often located alongside the coast or major rivers), then that should be specified in the policy. The default position should not be to avoid all subdivision use or development in areas subject to natural hazards as certain types of subdivision can still be appropriate. Refer to submission for more detail.	the FW icon.
S163.076	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Oppose	Defer to full RPS review in 2024	That the amendments to Policy 52 be deleted Delete the FW icon.
S163.077	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Oppose	This policy should only apply within urban areas or within proposed areas for urban expansion. Land users in remote rural areas with limited options for transportation and movement of people and goods, should not be required to commit to needless costs and delays in assessing alternatives in resource consent applications - for little or no environmental benefit	That the amendments to Policy 56 be amended to the following or similar effect: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development for land within urban areas or within proposed areas for urban expansion, Delete the FW icon
S163.078	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Oppose	This is a very open-ended provision, including and especially in relation to resource consent applications.	That Policy UD.2 be deleted. Delete the FW icon.
S163.079	Chapter 4.4: Non-regulatory policies	General comments - non-regulatory policies	Oppose	Defer to full review of the RPS in 2024	Delete all amendments
S163.080	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose	Defer to full review of the RPS in 2024 The proposed over-arching Objective A and Objective B are intended to provide a more concrete pathway towards a similar result.	That Policy CC.15 be deleted Delete the FW icon

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S163.081	Chapter 4.4: Non-regulatory policies	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Oppose	Defer to full review of the RPS in 2024	That the amendments to Policy CC.16 be deleted.
S163.082	Chapter 4.4: Non-regulatory policies	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	As set out for climate change objectives.	That Policy CC.18 be deleted Delete the FW icon.
S163.083	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Supports the intent of the policy, which is consistent with Ruamahanga WIP recommendations, the Wairarapa Water Resilience Strategy and the recent MPI report "Water Availability and Security". However, concern that it is non-regulatory. The proposed over-arching Objective B is intended to recognise the importance of this matter, and to provide a concrete pathway towards achieving it.	That the intent of Policy FW.7 be retained and expressed as an objective.
S163.084	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Oppose	Supports the intent of the policy, which is consistent with Ruamahanga WIP recommendations, the Wairarapa Water Resilience Strategy and the recent MPI report "Water Availability and Security". However, prefer that proposed over-arching Objectives A and B are included as they are intended to provide a concrete pathway towards a similar result.	That Policy FW.8 be deleted. Delete the FW icon.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S163.085	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Oppose	Defer to the 2024 RPS review. Clause a) would more efficiently be progressed at the national level. Generally support the intent of clause b) and c) but note that RPS Change One is not a pre-condition to action. Clause c) is broadly supported however question the extent to which proposals for imposing limitations to offsets is necessary and useful.	That Policy IE.3 be deleted. Delete the FW icon.
S163.086	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Oppose	Support the intent of this policy, however the proposed over-arching Objective A is intended to recognise the importance of this matter, and to provide a concrete pathway towards achieving it.	That Policy IE.4 be deleted. Delete the FW icon.
S163.087	Chapter 4.5: Methods to implement policies (regulatory methods)	General comments - regulatory methods	Oppose	Defer to the 2024 RPS review, including in the context that RPS Change One is not an impediment to action on most or all of these methods. There is general support for the intent of methods which provide for Council partnering with the community. To that end, we specifically support the wording of Method CC.4 which provides inclusively for "using a partnership approach" and suggest that wording could be used more widely. However, the proposed over-arching Objectives A and B are intended to recognise the importance of this approach, and to provide a concrete pathway towards achieving it.	That all amendments to Chapter 4.5 be deleted
S163.088	Chapter 4.5: Methods to	Method 4: Consideration - resource consents,	Oppose	Defer to the 2024 RPS review.	That the amendments to Method 4 be deleted.

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	implement policies (regulatory methods)	notices of requirement and when changing, varying or reviewing plans			Delete the FW icon.
S163.089	Chapter 4.5: Methods to implement policies (regulatory methods)	Method FW.1: Freshwater Action Plans	Oppose	Defer to the upcoming NRP changes in 2023 whaitua) and 2024 (rural whaitua).	That Method FW.1 be deleted
S163.090	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.2: Develop carbon emissions offsetting guidance	Oppose	Defer to the 2024 RPS review. We anticipate that national guidance will be developed in this area.	That Method CC.2 be deleted
S163.091	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.1: Partnering with mana whenua / tangata whenua to give local effect to Te Rito o te Harakeke	Oppose	Defer to the 2024 RPS review We anticipate that national guidance will be developed in this area.	That Method IE.1 be deleted Delete the FW icon
S163.092	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Oppose	Our proposed over-arching Objectives A and B are intended to provide a concrete pathway towards a similar result.	That Method IM.1 be deleted. Delete the FW icon

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S163.093	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Oppose	Defer to the 2024 RPS review	That the amendments to Method 32 be deleted. Delete the FW icon
S163.094	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Oppose	Defer to the 2024 RPS review We note that the Three Waters Review may alter the landscape on this matter. We question why the method is restricted to urban supplies, in particular clause d. Our proposed over-arching Objective B is intended to provide a concrete pathway towards a similar result.	That the amendments to Method 32 be deleted.
S163.095	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Oppose	Support for the intent, however the proposed over-arching Objective A and B are intended to provide a concrete pathway towards a similar result.	That Method CC.4 be deleted. Delete the FW icon
S163.096	Chapter 4.5: Methods to implement policies	Method CC.5: Review regional response to reducing	Oppose	Defer to the 2024 RPS review Concern that this method is restricted to just one sector - not all sectors.	That Method CC.5 be deleted.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	(non-regulatory methods)	agricultural greenhouse gas emissions			
S163.097	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.6: Identifying nature-based solutions for climate change	Oppose	Generally support intentions to prioritise; and expect that any tools for prioritising investments will be informed by "best bang for buck' principles; and supported by NZ and local evidence on sequestration values. However, the proposed overarching Objective A and B are intended to provide a concrete pathway towards a similar result.	That Method CC.6 be deleted. Delete FW icon
S163.098	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.7: Advocating for the use of transport pricing tools	Oppose	Defer to the 2024 RPS review Transport taxes should not be imposed on sectors which do not have realistic alternatives, eg, heavy transport, rural areas. Council have already been advocating to the Government to this effect, ie, Method CC.7 is not a pre-condition for Council action.	That Method CC.7 be deleted.
S163.099	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Oppose	Support the intent, however this can be progressed outside the RPS framework, ie, Method IE.2 is not a pre-condition for action.	That Method IE.2 be deleted. Delete the FW icon
S163.0100	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.3: Regional biodiversity strategy	Oppose	Defer biodiversity matters to the 2024 RPS review.	That Method IE.3 be deleted. Delete the FW icon
S163.0101	Chapter 4.5: Methods	Method 48: Water	Oppose	Defer water allocation matters to the 2024 RPS review.	That the amendments to Method 48 be deleted.

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	to implement policies (non-regulatory methods)	allocation policy review		More information on the reasons for rejecting this method is in the submission.	
S163.0102	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose	Defer to the full review of the RPS in 2024. General support for the intent but proposing an RPS Change One method is not a pre-condition for getting the job done.	That Method CC.8 be deleted. Delete the FW icon
S163.0103	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Oppose	Defer to the full review of the RPS in 2024. General support for the intent but proposing an RPS Change One method is not a pre-condition for getting the job done.	That Method CC.9 be deleted. Delete the FW icon
S163.0104	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	Oppose	Defer to the full review of the RPS in 2024. General support for the intent but proposing an RPS Change One method is not a pre-condition for getting the job done.	That the amendments to Method 53 be deleted Delete the FW icon
S163.0105	Chapter 4.5: Methods to	Method 54: Assist landowners to maintain,	Oppose	Defer to the full review of the RPS in 2024. General support for the intent - including clause b in respect of rates rebates	That Method 54 be deleted.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (non-regulatory methods)	enhance and restore indigenous ecosystems		(currently an anomaly in the Council rating system) - but proposing an RPS Change One method is not a pre-condition for getting the job done.	Delete the FW icon
S163.0106	Appendix 3: Definitions	General comments - definitions	Oppose	Defer to the 2024 RPS review	That all amendments to Appendix 3 be deleted
S163.0107	Appendix 3: Definitions	Highly erodible land	Oppose	Defer to the 2024 RPS review Further reasons set out in relation to Policy CC.6	Delete the new definition Delete the FW icon
S163.0108	Appendix 3: Definitions	Maintain /maintained /maintenance : (in relation to indigenous biodiversity)	Oppose	Defer to the 2024 RPS review Do not agree that "maintain" means "restore" or "enhance".	Delete the new definition Delete the FW icon
S163.0109	Appendix 3: Definitions	Nature-based solutions	Oppose	Defer to the 2024 RPS review Alternatively, use the definition of nature-based solutions from the NZ Biodiversity Strategy 2020 as it is more succinct.	Delete the new definition OR Insert the following definition of nature-based solutions to align with the NZ Biodiversity Strategy: Solutions that are inspired and supported by nature, cost-effective and simultaneously provide environmental, social and economic benefits and help build resilience. Delete the FW icon
S163.0110	Appendix 3: Definitions	Permanent forest	Oppose	Defer to the 2024 RPS review Further reasons set out in our relief on Objective CC.5 and Policy CC.6	Delete the new definition Delete the FW icon
S163.0111	Appendix 3: Definitions	Plantation forestry	Oppose	Defer to the 2024 RPS review Further reasons set out in our relief on Objective CC.5 and Policy CC.6	Delete the new definition Delete the FW icon
S163.0112	Appendix 3:	Protect (in relation to	Oppose	Defer to the 2024 RPS review	Delete the new definition

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	Definitions	indigenous biodiversity)			Delete the FW icon
S163.0113	Appendix 3: Definitions	Regionally significant infrastructure	Oppose	<p>Defer to the 2024 RPS review.</p> <p>Further reasons set out in our relief on Chapter 3.3.</p> <p>The definition does not provide for the expanded range of water storage infrastructure - municipal, community and rural - which will be critical across all sectors in the future.</p>	Delete the amendments to the definition
S163.0114	Appendix 3: Definitions	Te Rito o te Harakeke	Oppose	Defer to the 2024 RPS review.	<p>Delete the new definition</p> <p>Delete the FW icon</p>

S145 Wairarapa Water Users Society

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S145 Wairarapa Water Users Society					
S145.001	Chapter 3.4: Fresh water (including public access)	Freshwater introductory text	Oppose in part	<p>There is no time-critical imperative to review the Freshwater provision of the RPS. The only urgent requirement is the Urban Development provisions.</p> <p>The additions to the chapter introduction are symptomatic of the unnecessary haste being applied to the Plan change.</p> <p>The fact that only 2 out of 6 iwi have managed to provide an Expression of their meaning of Te Mana o Te Wai makes the plan review less than inclusive.</p> <p>The introduction should also recognise the significant community input into the Ruamahanga Whaitua and the Wairarapa Water Resilience Strategy.</p>	<p>Removal of the Freshwater Chapter from this review.</p> <p>OR</p> <p>If the chapter is retained, the Introduction should recognise the Ruamahanga Whaitua Implementation Plan AND the Wairarapa Water Resilience Strategy</p>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				Both of these documents have been accepted by GWRC.	
S145.002	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	This would appear to be an additional requirement for new consents and the renewal of existing consents. There are existing limitations to avoid water sources becoming over-allocated and the need for applicants to consider alternatives is unnecessary.	Removal of the new clause (h) (h) there is consideration of alternative water supplies such as storage or capture of rainwater for use during the drier summer months
S145.003	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support	The recognition of both Nature-based and built solutions is vital in allowing water to assist in achieving community wellbeing in Wairarapa and the rest of the region. The aim of this new Policy echo's the principles in the Wairarapa Water Resilience Strategy. The Wairarapa Water Users Society believes the foundations laid by this policy would be enhanced if it became an Objective.	Retain as notified.
S145.004	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 48: Water allocation policy review	Oppose	The consideration of alternatives to the "first in first served" principle in the RMA would seem to be beyond the remit of a Regional Council. If a new fundamental principle is proposed, this should be left to Central Government as they hold the power to create law. This would also seem to cut across the overall review of the RMA that is currently underway with the Government. The potential exists for this change from "first in first served" to be applied to existing consents, particularly if the Council believes that the current consents create an unfair allocation.	Amend Method 48 to remove (f) OR If the provision is retained, any review process should include having the current water users at the table with the ability to provide information and influence the decisions made. A factor in the consideration of alternatives needs to be the value of assets that may become "stranded" if access to water is reduced or removed.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S129 Waka Kotahi NZ Transport Agency					
S129.001	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The emissions reduction plan has superseded the earlier declaration of climate emergency Greater Wellington Regional Council adopted in 2019.	Seeks to be involved in ongoing drafting of the climate change chapter.
S129.002	Chapter 3.1A: Climate change	Objective CC.1	Support in part	Supports (b) and the provision of well-functioning urban areas.	Seeks further clarification of how low emission and climate mitigation and adaptation is defined.
S129.003	Chapter 3.1A: Climate change	Objective CC.1	Support in part	Supports provision (c) of well-planned infrastructure.	Seeks further clarification of how this will be implemented.
S129.004	Chapter 3.1A: Climate change	Objective CC.2	Support	Supports the costs and benefits of transitioning to low carbon being shared fairly.	Seeks clarification of how the costs and benefits will be shared.
S129.005	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Support in part	Support that equity, inclusiveness and access to suitable travel choices is important.	Insert new methods to articulate how equity, inclusiveness and access be provided.
S129.006	Chapter 3.1A: Climate change	Objective CC.3	Support in part	Supports the intention of reducing greenhouse gas emissions. Support the intent of targets but want Waka Kotahi to be involved in developing and refining the targets and methods used, to ensure these targets are feasible.	Seeks alignment with the direction from Central Government.
S129.007	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support	Supports the direction to District Councils to consider travel demand management plans to identify trip generation and provide opportunities to address Vehicle Kilometres Travelled (VKT).	Retain as notified.
S129.008	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	Supports this intention to enable mode shift.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S129.009	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.2: Future Development Strategy	Support	Supports the preparation of a Future Development Strategy for the Wellington Region in accordance with the NPS-UD to enable appropriate growth and timely development of infrastructure.	Retain as notified.
S129.010	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	Supports the reduction of greenhouse gases which align with direction from Central Government as it becomes available.	Seeks alignment with the direction of Central Government.
S129.011	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support in part	Supports Policy 57(e) to prioritise the integration of land use and transportation. Transport choices and proximity to multimodal choices enables well-functioning urban areas and needs to be considered early. However notes that lower order documents could interpret an inconsistency between Policy 57 and 58.	Seeks clarification regarding the inconsistency between Policy 57 and Policy 58.
S129.012	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.3: Travel demand management plans	Support	Supports a coordinated approach to travel demand management and Vehicle Kilometres Travelled (VKT) reduction but notes that there is a lack of clarity about how this will be implemented.	Seeks clarification of how this will be implemented.
S129.013	Chapter 4.5: Methods to implement policies (non-	Method CC.10: Establish incentives to shift to active and public transport	Support in part	Generally supports, including that the policy promotes modal choice including active modes, and encourages consideration of the accessibility needs to the community. It is however noted that the current wording can be interpreted to suggest that the onus falls on transport	Seeks to amend wording to provide clarity on the responsibilities to achieve Method CC.10.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	regulatory methods)			infrastructure providers to provide the incentives to achieve the outcomes of this method. Much of this can be achieved through utilising the Regional Land Transport Plan process to identify activities to be put forward for funding.	
S129.014	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	Supports efficiency of freight movements and recognises the contribution this has in the minimisation of greenhouse gas emissions.	Requests to be involved in further discussions about the drafting Policy CC.10 and the methods to implement this direction.
S129.015	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support in part	Supports well-functioning urban environments and the reduction of transport related greenhouse gas emissions.	Requests to be involved in the future drafting of Policy 33 to ensure the policy appropriately aligns with direction from Central Government.
S129.016	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate	Support	Generally supports Policy CC.7 but consider that 'protecting' is too strong of a directive. The policy should be amended to be in keeping with the National Policy Statement for Indigenous Biodiversity drafting.	Amend Policy CC.7 as follows: Protecting, restoring, and enhancing Managing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans drafting.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		change - district and regional plans			
S129.017	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Supports the recognition of the benefits of renewable energy and regionally significant infrastructure, however consideration of local and regional benefits, functional and operational need and adverse effects need to be considered on a case by case basis to determine what is appropriate in any particular circumstances.	Retain as notified to enable adequate consideration of regionally significant infrastructure in a District context.
S129.018	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support in part	Generally supports Policy 9 and the promotion of a shift to low emission fuels. The current wording can be interpreted to suggest that the onus falls on transport infrastructure providers, like Waka Kotahi, to provide the incentives to achieve the outcomes of this method.	Seeks further clarification with regard to how the RPS will direct the shift to greenhouse gas reduction and low emission fuels.
S129.019	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support	Supports the Regional Council providing direction to territorial authorities to receive Financial Contributions to manage actual effects.	Retain as notified.
S129.020	Chapter 3.4: Fresh water (including public access)	Table 4	Support in part	Generally supportive of Policy 45, Table 4, but it is noted that using water within work sites is essential in the way Waka Kotahi operate, maintain, and construct infrastructure. Therefore, it is necessary to clarify what 'efficiently' means in relation to water use.	Seeks that Policy 45, Table 4 be clarified to ensure the functional and operational needs of infrastructure is recognised and provided for.
S129.021	Chapter 3.6: Indigenous	Objective 16	Support in part	Generally supports but consider that 'protected' is too strong of a directive. The policy should be amended to be in keeping	Amend Objective 16 as follows: Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	s ecosystems			with the exposure draft of the National Policy Statement for Indigenous Biodiversity.	values are maintained protected, enhanced, and restored to a healthy functioning state.
S129.022	Chapter 3.6: Indigenous ecosystems	Table 6(a)	Support	Generally supports the intent of Policy 24 but seeks that the wording is consistent with the exposure draft of the National Policy Statement for Indigenous Biodiversity.	Amend Policy 24 as follows: Protecting, Managing indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans
S129.023	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	Policy should be aligned with the NPS-IB exposure draft.	Align Policy 47 with the NPS-IB exposure draft and clarify how to manage effects.
S129.024	Chapter 3.9: Regional form, design and function	General comments - urban development	Support in part	Intensification of existing urban areas be prioritised and further consideration be given to the role of enabling infrastructure as lead infrastructure planned for and included in the Future Development Strategies.	Clarify how Objective 22A provides the scope for Policy 55 to define what appropriate urban expansion is and how it will be provided.
S129.025	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Supports the integration of land use and transport infrastructure as a means of providing good environmental outcomes and supporting the efficient use of infrastructure. Supports urban expansion occurring as anticipated by strategic planning or zoning within district plans. However, seeks the prioritising of intensification of existing areas first. Out of sequence or out of zone urban expansion can result in the inefficient use of, and has adverse effects on, infrastructure.	Add explanation to note that urban expansion occurring as anticipated by strategic planning or zoning within district plans should be prioritised. Out of sequence or out of zone urban expansion can result in the inefficient use of, and has adverse effects on, infrastructure.
S129.026	Chapter 4.2: Matters to be	Policy 56: Managing development in the rural	Support in part	Supports the direction of Policy 56 where it manages development in rural areas. Dispersed development is at odds with the MDRS direction to centralise development	Amend the provisions to address the relief sought in the submission. Supports the inclusion of more direction that intensification is prioritised ahead of greenfield developments and development of rural areas. If

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	considered	areas - consideration		and intensify our urban centres. Supports the inclusion of more direction that intensification is prioritised ahead of greenfield developments and development of rural areas. If development is to occur in rural areas, then the provision of mode choice options should be required.	development is to occur in rural areas, then the provision of mode choice options should be required.
S129.027	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Supports the general intent, but considers that this policy needs to prioritise the intensification of existing urban areas rather than enabling greenfield developments for significant development capacity. Seek that the wording is amended to clarify that intensification of existing urban areas ahead of greenfield developments is prioritised and responsive planning should occur where intensification is not available:	Amend Policy UD.3 as follows: Responsive planning to developments that provide for a within the existing urban environment is priorities ahead of greenfield developments when significant development capacity is considered — consideration
S129.028	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	Supports Policy 58 as it promotes integrated transport, land use planning and multi-modal transport, but considers further clarification is required	Seek clarification of how Policy 58 will be implemented.
S129.029	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Supports the direction to implement the actions in the Future Development Strategy which describes where and how future urban development should occur. Well-functioning urban communities are reliant on transport choice to enable communities to operate at a scale that reduces VKT and lowers emissions.	Retain as notified.
S129.030	Chapter 4.5: Methods to	Method 2: Regional plan	Support	Supports this method as it aligns with the timeframes specified within higher order documents.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (regulatory methods)	implementation			
S129.031	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 3: Wellington Regional Land Transport Plan implementation	Support	Supports to be involved in advance to enable early collaboration.	Retain as notified.
S129.032	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 4: Consideration - resource consents, notices of requirement and when changing, varying or reviewing plans	Support	Supports this method as it provides clear direction to District and City Councils.	Retain as notified.
S129.033	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.2: Develop carbon emissions offsetting guidance	Support in part	Generally supports the intent of this policy but awaits direction from Central Government before being able to confirm full support.	Seeks alignment with the direction from Central Government.
S129.034	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support in part	Supports the preparation of development manuals and design guidance subject to inclusion of mode choice and the encouragement of intensification in areas that have existing transport infrastructure. Requests that urban design guidance and development manuals include mode choice and encouragement development in close proximity to existing transport choices.	Amend method to ensure that urban design guidance and development manuals include mode choice and encourage development in close proximity to existing transport choices.

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S129.035	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support	Supports Method IM.1(c) as the Wellington Regional Growth Framework provides an opportunity for early multi agency engagement to ensure enabling infrastructure is adequately provided for.	Retain as notified.
S129.036	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support in part	Supports Method IM.1(d) a connected approach to resource management, but it is not clear what this method is anticipating to achieve.	Seek to clarify what Method IM.1(d) is anticipated to achieve.
S129.037	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support	Support Method IM.1(e) as acknowledges the need to consider the cumulative impacts of activities and the need to align development with the future development strategies which identify how the well-functioning urban areas will be shaped.	Retain as notified.
S129.038	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support	Supports Method IM.1(g) for the sharing of data and looks forward to an identified information sharing platform.	Retain as notified.
S129.039	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support	Support Method IM.1(h) as acknowledges that we have similar mode shift behaviour change incentives and look forward to working with Greater Wellington Regional Council to rationalise funding.	Retain as notified.

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S129.040	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Support	Supports Method FW.2(a) and the coordinated and collaborative approach proposed by this method point as it will enable well-functioning urban development that aligns with the future development strategies and the regional aspirations.	Retain as notified.
S129.041	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Support	Supports Method FW.2(a) as it is consistent with expectations for engagement with our iwi partners.	Retain as notified.
S129.042	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 46: Develop complex development opportunities	Support	Supports this method and our continued involvement through our participation in the Wellington Regional Leadership Committee.	Retain as notified.
S129.043	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.7: Advocating for the use of transport pricing tools	Support in part	Agrees in principle with the behaviour change being sought however believe that further direction is required from central government before being able to support this method.	Seeks alignment with the direction from Central Government.
S129.044	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.3: Regional biodiversity strategy	Support	Supports Method IE.3 and seek to be involved as a key stakeholder to ensure that the maintenance and operation of infrastructure is enabled.	Retain as notified.

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S129.045	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.10: Establish incentives to shift to active and public transport	Support	Acknowledges that have similar mode shift behaviour change incentives and look forward to working with the Greater Wellington Regional Council to rationalise funding.	Retain as notified.
S129.046	Chapter 3.9: Regional form, design and function	Objective 22	Support	Supports the direction that development should only occur where it can demonstrate that the characteristics and qualities of a well-functioning urban environments are provided.	Retain as notified.

S140 Wellington City Council (WCC)

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S140 Wellington City Council (WCC)					
S140.001	General comments	General comments - overall	Support in part	Concerns with adding short timeframes when the reasoning cannot be found in the s32 report. Councils will likely be in the middle of transitioning to a new Resource Management legislative system which may not align with the proposed changes or be feasible to implement so many changes at once.	Remove or update all references to "30 June 2025" in the Regional Policy Statement.
S140.002	Chapter 4.2: Matters to be considered	General comments - consideration policies	Support in part	The title of the regulatory policies as 'consideration' policies set out in chapter 4.2 creates confusion for their statutory weighting and should be amended.	Amend the wording of the title of the regulatory policies as outlined in Chapter 4.2 from 'Consideration' to 'Give particular regard'.
S140.003	Chapter 4.3: Allocation of responsibilities	General comments - allocation of responsibilities	Support	The ordering and wording of the regulatory policies as set out in chapter 4.3 ignores case law and best practise for a what is considered a well written plan. If a plan already gives effect to a higher-level document or policy, then it should not be necessary to refer back to the high-level document in the decision-making process (resource consent level). Refining the wording of the RPS will provide better clarity and direction to the Local Authorities trying to implement the RPS	Amend wording to "When considering a plan change, variation or review of a plan or if the policy has not been given effect to in the plan, an application for a resource consent or notice of requirement..."
S140.004	Chapter 3: Resource management	Overarching Issue 2: Increasing	Support in part	Issue 2 focuses on adverse effects on the natural environment, and only references housing and infrastructure capacity as a negative pressure on the environment. RMA	Amend Issue 2 with the underlined text, or similar: "Increasing need for housing and infrastructure capacity. The supply of housing and

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	t issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	pressure on housing and infrastructure capacity		section 59 requires the RPS to look at integrated management of natural and physical resources for the region, not just protecting natural processes. It also ignores the NPS-UD objectives.	infrastructure capacity in the Wellington Region has been insufficient to meet population growth, household needs, and creation of well-functioning urban environments."
S140.005	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	To aid in navigating the RPS, the objective should not be located within a chapter introduction, instead it should be located in a stand alone chapter.	Relocate proposed Objective A out of the chapter introduction and treat consistently with how other objectives in the RPS are presented.
S140.006	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	The wording of the introduction "seven of the past nine years" will soon be out of date.	Amend the start of the introduction: "As of 2022, long term weather records..." [End of amendment to Chapter 3 introductory text] Or otherwise reword so that it will continue to make sense when read in future years.
S140.007	Chapter 3.1A: Climate change	Objective CC.2	Support	Support as proposed.	Retain as notified.
S140.008	Chapter 3.1A: Climate change	Objective CC.3	Support	Support as proposed.	Retain as notified.
S140.009	Chapter 3.1A:	Objective CC.3	Support	Support as proposed	Retain as notified.

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	Climate change				
S140.010	Chapter 3.1A: Climate change	Objective CC.4	Support	Support as proposed.	Retain as notified.
S140.011	Chapter 3.1A: Climate change	Objective CC.5	Support	Support as proposed.	Retain as notified.
S140.012	Chapter 3.1A: Climate change	Objective CC.6	Support	Support as proposed.	Retain as notified.
S140.013	Chapter 3.1A: Climate change	Objective CC.7	Support	Support as proposed.	Retain as notified.
S140.014	Chapter 3.1A: Climate change	Objective CC.8	Support in part	Support but we seek the deletion of the reference to hapū. It is unclear how this can be achieved through council's strategies of partnership with iwi-based mana whenua organisations, and has the potential for uncertainty about the respective roles of iwi and hapū.	Delete the reference to hapū or replace with iwi authority.
S140.015	Chapter 3.4: Fresh water (including public access)	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	Support the need for of Iwi expression of Te Mana o te Wai, but there is a need to clarify whether they have regulatory weighting	Clarify the regulatory weighting of the Iwi expression of Te Mana o te Wai.
S140.016	Chapter 3.4: Fresh water (including public access)	Objective 12	Support	Support as proposed.	Retain as notified.
S140.017	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support	Support as proposed.	Retain as notified.
S140.018	Chapter 3.6: Indigenous ecosystems	Objective 16	Support	Support as proposed.	Retain as notified.
S140.019	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support in part	Wording should be consistent with the Exposure Draft for the proposed National Policy Statement for Indigenous Biodiversity (NPS-IB).	The region's indigenous ecosystems biodiversity are-is maintained, enhanced, and restored to a healthy functioning state, improving their resilience to increasing

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.
S140.020	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support	Support as proposed.	Retain as notified
S140.021	Chapter 3.6: Indigenous ecosystems	Objective 16C	Support	Support as proposed.	Retain as notified.
S140.022	Chapter 3.8: Natural hazards	Natural hazards introductory text	Support	Support as proposed	Retain as notified.
S140.023	Chapter 3.8: Natural hazards	Objective 19	Support	Support as proposed.	Retain as notified.
S140.024	Chapter 3.8: Natural hazards	Objective 20	Support	Support as proposed.	Retain as notified.
S140.025	Chapter 3.8: Natural hazards	Objective 21	Support	Support as proposed.	Retain as notified.
S140.026	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	Confusing introduction with unclear direction.	Clarify and refine introduction.
S140.027	Chapter 3.9: Regional form, design and function	Objective 22	Support	Support as proposed.	Retain as notified.
S140.028	Chapter 3.9: Regional form, design and function	Objective 22B	Support	Support as proposed.	Retain as notified.
S140.029	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and	Support in part	We support this policy but recommend that the policy can be further strengthened by: a reference to the prioritisation of various modes based on the sustainable transport hierarchy.	Add: A reference to the prioritisation of various modes based on the sustainable transport hierarchy.

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		regional plans			
S140.030	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Support in part	At a high level WCC supports provisions which will discourage vehicular generating activities in greenfield areas, and in areas not close to public transport and employment. A major concern is that the lack of specificity will lead to inconsistencies in the approach across the region and create tension between the intended outcome of this policy and the practical implementation carried out by Territorial Authorities. Additionally, when looking at the definition of a 'travel demand management plan', the policy will likely result in the consideration of the individual development only, which has the risk of ignoring region-wide pressures. Policy CC.2 also reads as being more appropriate as a consideration policy, where having a more flexible approach is enabled and can be utilised more effectively by a Territorial Authority.	Delete policy CC.2 and the integrate the Policy into the Regional Land Transport Plan. Or Amend Policy CC.2 to be a consideration policy with clearer direction on the outcomes being sought.
S140.031	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	The policy statement should focus on "zero-carbon" emission transport. Given that it is a policy to enable mode shift, the use of low-emission transport is a "given" as part of the transition. There are also more modes of low-emission transport that have not been identified.	Amend Policy to have a focus on "zero-carbon" emission transport and expand the types of active transport modes
S140.032	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	At a high level WCC supports the intent of this policy. This policy is not sufficiently clear for policy statement users to understand what is required. Policy direction is unclear as to what the RPS is intending, particularly as resilience in relation to climate change is not defined in the RPS. The Explanation reads as policy direction rather than a requirement to provide additional information and should be included in the main section of the policy.	Amend to clarify and refine policy Amend Policy to include a portion of the explanation in the Policy section. District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments. Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. For the purposes of this policy, climate-resilient urban areas mean urban environments that have the ability to withstand: <ul style="list-style-type: none"> • Increased temperatures and urban heat island • Increased intensity of rainfall and urban flooding • Droughts and urban water scarcity and security • Increased intensity of wind, cold spells, landslides, fire,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					and air pollution Explanation The policy is directly associated with Policy CC.14 which provides further direction on actions and initiatives to provide for climate resilient urban areas- It is noted that other policies of this RPS also provide for actions and initiatives to deliver climate resilient urban areas, including Policy FW.3
S140.033	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Support as proposed.	Retain as notified.
S140.034	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support	Support as proposed.	Retain as notified.
S140.035	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Support as proposed.	Retain as notified.
S140.036	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission	Support	Support as proposed, note our comments on proposed new Policy CC.2 that the Regional Land Transport Plan is a useful tool to create a Transport Demand Management Plan for the	Amend Policy 9 as needed.

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		reduction and uptake of low emission fuels - Regional Land Transport Plan		region or at least guidance for how to create one that will achieve the best outcomes for the region.	
S140.037	Chapter 4.1: Regulatory policies	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support	Support deletion of this policy.	Retain as notified
S140.038	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Support as proposed.	Retain as notified.
S140.039	Chapter 4.1: Regulatory policies	Policy 13: Allocating water - regional plans	Support	Support as proposed.	Retain as notified.
S140.040	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area -	Support in part	The new policy requires urban development to protect gully heads. This differs from the other features in this policy 14(h) in that it is not a freshwater body. Earthworks around gully heads can reduce erosion risk and can create more usable areas for development, which reduces the greenfield areas needed to house population growth and meets NPS-UD objectives. Urban development is already required in (g) to follow existing land contours "to the extent practicable"	Amend as following: ...(h) Require that urban development is located and designed to protect and enhance gully heads , rivers, lakes, wetlands, springs, riparian margins and estuaries

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		regional plans			
S140.041	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	Support as proposed.	Retain as notified.
S140.042	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Support as proposed.	Retain as notified.
S140.043	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Support as proposed.	Retain as notified.
S140.044	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support	Support as proposed.	Retain as notified.
S140.045	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Oppose	Both provisions overlap with the Building Act and the policy is not specific as to how this will be achievable under the RMA. Additionally, since the monitoring and enforcement of these provisions will also fall under the Building Act and it is unlikely, we do not have tools to monitor the efficacy of this policy. In terms of water demand management, the use of nonpotable water and the management of end of use water will not be effective. If reducing water demand is the goal, then the focus should be on the water that is being lost to leaks in the infrastructure and on understanding water use per house.	Delete Policy FW.2

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				The point of rainwater storage and use (non-potable water) is also already addressed in Policy 44 point (h).	
S140.046	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>WCC acknowledges its responsibilities under the NPS-FM 2020 as set out by section 3.5(4). However, some of the provisions being required by district plans are outside the scope of s30 of the RMA:</p> <ul style="list-style-type: none"> • Vegetation clearance and earthworks in the riparian margin has a direct effect on the water quality of the waterbody, therefore the land use and subsequent discharge of sediment laden material should be managed by Regional Council. Otherwise, development would need to go to the relevant territorial authority for the s9 consent and then to GWRC for the s15 discharge consent. This would not promote integrated management. • The effects of the development on drinking water sources should be managed by Regional Council with the identification of Drinking Protection Zones and relevant requirements for discharge consents. • The piping of rivers is a s13 matter that should be managed by Regional Council. • Water efficiency is also managed by Regional Council under s14 of the RMA and is unclear how s9 would have any influence on water use. 	<p>Amend Policy FW.3 as following:</p> <p>... (k) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;(l) Require riparian buffers for all waterbodies and avoid piping of rivers;</p> <p>(m) Require hydrological controls to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;(n) Require efficient use of water;</p> <p>(o) Manage land use and development in a way that will minimise the generation of contaminants, including building materials, and the extent of impervious surfaces;</p> <p>(p) Consider daylighting of streams, where practicable;</p> <p>and(q) Consider the effects of land use and development on drinking water sources...</p>
S140.047	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>The question of how to fund stormwater management measures is solely a decision for territorial authorities and their communities under the Local Government Act. There are a number of different tools territorial authorities can use, one of which is financial contributions and development contributions. Territorial authorities also have other funding options, such as using general revenues or targeted rates.</p> <p>It is also unclear what type of development this policy would apply to and how the management of the system post construction factors into when financial contributions apply. There are also a number of issues with this policy as drafted, including the lack of a definition for "fair share". It will also be difficult to adequately apply financial contributions to permitted activities</p>	<p>Delete Policy FW.4</p> <p>OR</p> <p>Move Policy FW.4 to be a consideration policy and clarify whether the management of the new system will then fall to the Territorial Authority or not.</p>
S140.048	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats	Oppose	Reason set out in 'general' section above.	Remove deadline.

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		with significant indigenous biodiversity values - district and regional plans			
S140.049	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	Reason set out in 'general' section above.	Remove deadline.
S140.050	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support	This policy should be clear in the text that it relates to indigenous biodiversity management.	Amend with this text, or similar: When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan, as it relates to managing indigenous biodiversity for subdivision, use or development, particular regard shall be given to enabling mana whenua / tangata whenua to exercise their role as kaitiaki ...
S140.051	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and	Support in part	Support the intent of this policy. As some hazards recur with a frequency of less than 1 in 100 years (such as fault ruptures) it should be clarified that it does not preclude consideration of hazards beyond this time period.	Retain the amendments to Policy 29, but with the following change to clause (b): "use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over at least a 100 year planning horizon;"

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		regional plans			
S140.052	Chapter 4.1: Regulatory policies	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support in part	<p>Johnsonville and Kilbirnie should be considered 'other regionally significant centres' as it helps align with the metropolitan centre zone application approach of the WCC PDP.</p> <p>It recognises that the role in growth, economic contribution, access to transport and range of services of Johnsonville and Kilbirnie is aligned with the regional centres, rather than the local centres they had been grouped with.</p>	<p>Amend policy as following:</p> <p>Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of regional central business district in the Wellington city and the:</p> <ol style="list-style-type: none"> 1. the regionally significant central business district of Wellington City; 2. other regionally significant centres: <ol style="list-style-type: none"> (i) Upper Hutt city centre; (ii) Lower Hutt city centre; (iii) Porirua city centre; (iv) Paraparaumu town centre; (v) Masterton town centre; and the (vi) Metropolitan centres of Johnsonville and Kilbirnie. 3. the locally significant (suburban) centres in: <ol style="list-style-type: none"> (i) Petone; (ii) Kilbirnie; and (iii) Johnsonville; (iv) Ōtaki; (v) Waikanae; (vi) Featherston; (vii) Greytown (viii) Carterton; and (ix) Martinborough...
S140.053	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	Support provided that the definitions of 'high density development' and 'medium density residential development' are amended as outlined below in the definition. With the current definitions the policy is too prescriptive and does not meet the intent of the NPS-UD.	Retain as notified provided the definitions of 'high density development' and 'medium density residential development' are amended.
S140.054	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment	Support	Support as proposed.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		locations - district plans			
S140.055	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	Support as proposed.	Retain as notified.
S140.056	Chapter 4.1: Regulatory policies	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support in part	While we support the general intent of this policy it is unclear which situations the policy is intended to apply to. At minimum the policy should set out whether it applies only to Māori freehold land, or whether any general land in Māori ownership is included, and which mana whenua groups should be covered.	Amend Policy UD.1 to clarify which situations the policy applies to.
S140.057	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support	Support as proposed.	Retained as notified.
S140.058	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Support in part	While we understand the intent of the policy, it is uncertain how this will be implemented within the current resource management considerations for city and district councils without further clarification.	Clarify and refine intent and wording of Policy IM.2

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S140.059	Chapter 4.2: Matters to be considered	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Oppose	Overall WCC supports the intent of Policy CC.9, however the wording is uncertain and confusing meaning it will be difficult to implement in a consistent and practicable manner. Similarly to Policy CC.2, as it will likely be implemented at a local scale, there is the risk of missing region-wide pressures... and planning for reducing emissions will need to be done at a regional scale to achieve optimal results and reduce cross-boundary pressures	Delete Policy CC.9
S140.060	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Oppose	Applying this consideration to resource consents and notices of requirement will result in unnecessary bureaucracy. Freight servicing developments already look for transport networks and freight movements that are efficient, because this is critical to their business. Greenhouse gas emission reductions for freight businesses are far more effective through tools such as ETS placing costs on fuel, incentives for alternative fuels, etc. This can be a relevant consideration for plan changes that enable freight activities, for example where to zone a new industrial area. However, this is included in Policy CC.9 above.	Delete Policy CC.10.
S140.061	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support in part	The title should be clear that this applies to transport infrastructure, however the policy itself is supported to add rigour to greenhouse gas emission assessments of transport projects and encourage new and more efficient low-carbon technologies More consideration needs to be made for the implementation of this policy to try and ensure that basing a policy off modelling where numbers could change with technology will not end in a situation similar to Nutrient Management and the use of Overseer.	Amend title to read: Encouraging whole of life carbon emissions assessment for transport infrastructure - consideration [End of amendments to Policy CC.11] Clarify and refine policy wording to provide greater certainty of how this policy will be implemented.
S140.062	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Intent and requirements of policy is unclear and confusing in terms of how it can be feasibly implemented given the policy has used broad and unclear terms. This includes avoiding doing activities in constructed wetlands and rain gardens as they are included in the definition of nature-based solutions. Additionally, the accompanying definitions do not provide any further clarity for the Policy. This is addressed below.	Clarify and refine policy wording to provide greater certainty of how this policy will be implemented.
S140.063	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse	Support in part	As district plans may have rules that manage other aspects of agricultural land use, this policy should be clear it applies to discharge permits only.	Amend with this text, or similar: When considering an application for a discharge permit resource consent , associated with a change in intensity or type of

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		gas emissions - consideration			agricultural land use, particular regard shall be given to:
S140.064	Chapter 4.2: Matters to be considered	Policy CC. 14: Climate-resilient urban areas - consideration	Support in part	This "provide for" policy is unclear how it would work with resource consents and notices of requirement, and to a lesser extent plan changes, given many will not be relevant to climate resilience. Also some are covered by other methods, e.g. through the Building Act, through pre-development stormwater requirements, Wellington Water methods for efficient water use and discharge	Amend (a) by deleting the targets: maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb scale by 2030, and 30 percent cover by 2050,
S140.065	Chapter 4.2: Matters to be considered	Policy CC. 14: Climate-resilient urban areas - consideration	Support in part	Wellington City supports increasing tree canopy cover in our City. Our urban suburbs collectively already have 30.61% tree cover. (https://ir.canterbury.ac.nz/bitstream/handle/10092/102168/FOR_E1265_Tree_Canopy_Wgtn_Report.pdf?sequence=2&isAllowed=y#:~:text=Overall%20tree%20canopy%20cover%20in,ranging%20between%2010%20%E2%80%93%2040%25.) Our Green Network Plan aims to double the number of trees in the Central City. However, a 30% tree canopy cover target is not reasonable for some suburbs. Rongotai suburb is mostly Airport and bulk retail/industrial (currently 1% tree cover), and Pipitea suburb is mostly transport infrastructure (currently 3% tree cover). Wellington City is also relatively unique in the Region for not suffering from a noticeable heat island effect due to its regular wind, topography and coastal location. Targets are best left to district councils to set according to their own situation and methods.	Amend (a) by deleting the targets: maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb scale by 2030, and 30 percent cover by 2050,
S140.066	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support	Support as proposed.	Retain as notified.
S140.067	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing	Support	Support as proposed.	Retain as notified.

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		the health and well-being of water bodies and freshwater ecosystems - consideration			
S140.068	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Support as proposed.	Retain as notified.
S140.069	Chapter 4.2: Matters to be considered	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Support the deletion of this policy.	Delete Policy 43 as proposed.
S140.070	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Support as proposed.	Retain as notified.
S140.071	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Support as proposed.	Retain as notified
S140.072	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous	Support	Support as proposed.	Retain as notified.

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		ecosystems and habitats with significant indigenous biodiversity values - consideration			
S140.073	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support	Support as proposed.	Retain as notified.
S140.074	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	As written, the policy would stop use and development that could actually reduce hazards and risk, for example relocation, protection structures, lot adjustments. It's not just "inappropriate" development affected by this policy anymore. Also, hazard sensitive activities are part of "use and development".	Amend with this text, or similar: (g) avoiding subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme; ensuring that subdivision, use or development in areas with high to extreme natural hazard risk can avoid, or mitigate to a moderate or low level, the natural hazard risk;
S140.075	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Support the intent of this policy, but more research is needed before 'room for the river' policy can effectively be implemented in the Wellington region and should be removed until we have more information.	Amended Policy 52: (b) whether non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options provide a more appropriate or suitably innovative solution;
S140.076	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Support	Support as proposed.	Retain as notified.
S140.077	Chapter 4.2: Matters to be considered	Policy 56: Managing development in the rural areas - consideration	Support in part	This policy is confusing, in that it gives particular regard to matters that the RPS presumably wants to happen, and matters the RPS presumably doesn't want to happen, without a clear statement about which state it prefers. The policy should be worded to consistently refer to the outcomes the RPS wants.	Amend with this text, or similar: (a) the proposal will result in a loss of retain the productive capability of the rural area, including minimising cumulative impacts that would reduce the potential for food and other primary production and reverse

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					<p>sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals;</p> <p>(b) the proposal will reduce retain or enhance aesthetic and open space values in rural areas between and around settlements;</p> <p>(c) the proposal's location, design or density will minimise demand for non-renewable energy resources; and</p> <p>(d) the proposal is consistent with any Future Development Strategy, or the city or district regional or local strategic growth and/or development framework or strategy that addresses future rural development, should the Future Development Strategy be yet to be released; or</p> <p>(e) in the absence of such a framework or strategy, the proposal will not increase pressure for public services and infrastructure beyond existing infrastructure capacity.</p>
S140.078	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation - consideration	Support in part	Applying this requirement to resource consents will result in unnecessary bureaucracy. This policy is about integrated land use and transport planning, which is best done through a plan change, or where a new notice of requirement is applied overtop. Integration is best achieved through plan provisions, not RPS consideration at individual consent level.	Amend with this text, or similar: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, require land use and transport planning within the Wellington Region is to be integrated in a way which: ...
S140.079	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	It is unrealistic to stop all urban development until all public transport and multi-modal transport are available to serve it. Public transport, cycleways and other transport infrastructure in existing urban areas will usually be the responsibility of councils. Development should not be stopped while this is being built. For example, some high density developments along the Let's Get Wellington Moving Mass Rapid Transit corridor should be allowed while the MRT is being designed, consented and constructed. Also the policy confuses all "subdivision, use or development" and "new urban development", and the list of	Amend with this text, or similar: When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan, for new urban development , subdivision, use or development, give particular regard to its layout, location and sequencing so require all new urban development including form, layout, location, and timing is sequenced in a way that:

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				transport infrastructure options "low or zero carbon", "multi modal", and "public transport" overlap.	(a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and (b) the development is integrated with planned or constructed transport infrastructure for low or zero carbon modes and public transport. (b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring.
S140.080	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support	Support as proposed.	Retain as notified.
S140.081	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>We support this direction to meet the requirements of clause 3.8(3) of the NPS-UD. However, the criteria could be improved and made more consistent with the goals of the NPS-UD and easier to read:</p> <ul style="list-style-type: none"> • To better provide for non-residential development, • To recognise there may be limitations in monitoring and this should not preclude applicants from providing the assessment instead, • To avoid unnecessary assessment which is not necessary to determine if a proposal provides for significant development capacity, • To provide a standard for infrastructure provision that recognises that infrastructure capacity cannot always cleanly be assigned and limited to specific areas, and • To improve clarity. 	<p>Clarify and refine wording of policy; and Amend Policy UD.3 as follows:</p> <p>"Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration</p> <p>When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:</p> <p>(a) the location, design and layout of the proposal:</p> <p>(i) contributes to establishing or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22,</p> <p>(ii) is well -connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors, (iii) where it provides for housing the proposal will apply a relevant residential zone or other urban zone that provides for high density</p>

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					<p>development or medium density residential development. (iii) enables medium or high density housing as part of a Centre(s) and/or Mixed Use zoning, or within walking distance of a Centre(s) and/or Mixed Use zoning.</p> <p>(b) the proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage otherwise identified in monitoring for:</p> <p>(i) a variety of housing that meets the a regional, district, or local shortages shortage of housing in relation to the a particular type, size, or format, or</p> <p>(ii) business space or land of a particular size or locational type, or</p> <p>(iii) community, cultural, health, or educational facilities, and or</p> <p>(iv) the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and</p> <p>(c) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution:</p> <p>(i) is of high yield relative to either the forecast demand or the identified shortfall,</p> <p>(ii) will be realised in a timely (i.e., rapid) manner, and</p> <p>(iii) is likely to be taken up, and (iv) will facilitate a net increase in district wide up take in the short to medium term,</p> <p>(d) required development infrastructure can be provided effectively and efficiently for the proposal, taking into account that the capacity provided by existing or committed infrastructure may already be needed for and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for,</p>

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					other feasible, likely to be realised developments, in the short-medium term.
S140.082	Chapter 4.3: Allocation of responsibilities	Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	Support	Support as proposed.	Retain as notified.
S140.083	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support in part	Clarify that the responsibility of the land use management (earthworks and vegetation clearance) of the riparian margins of water bodies is managed by Regional Councils.	Amend policy to add who is responsible for land use in the riparian margins of a waterbody
S140.084	Chapter 4.4: Non-regulatory policies	Policy CC. 16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	WCC supports the intent of the Policy but is concerned that if done on a city or district wide scale, the benefits will be limited and not achieve integrated management throughout the region.	Amend so it is led and guided by Greater Wellington Regional Council.
S140.085	Chapter 4.4: Non-regulatory policies	Policy CC. 18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	Support as proposed.	Retain as notified.
S140.086	Chapter 4.4: Non-	Policy 65: Supporting and	Support	Support as proposed.	Retain as notified.

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	regulatory policies	encouraging efficient use and conservation of resources - non-regulatory			
S140.087	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Support as proposed.	Retain as notified.
S140.088	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support in part	For better consistency and guidance of land use adaption, this should be led by the Regional Council.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.
S140.089	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support	Support as proposed	Retain as notified.
S140.090	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support	Support as proposed.	Retain as notified
S140.091	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and	Support	Support provided that the definitions of 'high density development' and 'medium density residential development' is amended as outlined below in the definition. With the current definitions the policy is too prescriptive and does not meet the intent of the NPS-UD.	Retain as notified provided the definitions of 'high density development' and 'medium density residential development' are amended.

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		characteristics of well-functioning urban environments - non-regulatory			
S140.092	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 1: District plan implementation	Support in part	Update to reflect other relief sought by WCC.	Any relevant amendments to the list of policies to reflect policies where we seek deletion
S140.093	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 3: Wellington Regional Land Transport Plan implementation	Support	Support as proposed.	Retain as notified.
S140.094	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 4: Consideration - resource consents, notices of requirement and when changing, varying or reviewing plans	Support	Update to reflect other relief sought by WCC.	Any relevant amendments to the list of policies to reflect policies where we seek deletion.
S140.095	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.3: Travel demand management plans	Support in part	Prior to the implementation of the Travel Demand Management Plan, guidance in collaboration with the City and District Councils should be provided to City and District Councils in order to provide greater clarity of intent and ensure consistency across the region.	Where requested, the Wellington Regional Council will develop in partnership with TAs assist city and district councils with determining land use thresholds for triggering a Travel Demand Management Plan requirement, as well as guidelines for a Travel Demand Management Plan that city and district councils can provide to developers to assist them with mitigating the travel movements and associated greenhouse gas emissions arising from new subdivision,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					use and development.
S140.096	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 14: Information on natural hazards and climate change	Support	Support as proposed.	Retain as notified.
S140.097	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 23: Information about natural features to protect property from natural hazards	Support	Support as proposed.	Retain as notified.
S140.098	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 25: Information about the provision of walking, cycling and public transport for development	Support	Support as proposed.	Retain as notified.
S140.099	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support	Support as proposed.	Retain as notified.
S140.0100	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support	Support as proposed.	Retain as notified.
S140.0101	Chapter 4.5: Methods to implement policies	Method IM.2: Protection and interpretation	Support	Support as proposed.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	(non-regulatory methods)	of Mātauranga Māori and Māori data			
S140.0102	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Support	Support as proposed.	Retain as notified.
S140.0103	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 17: Reducing waste and greenhouse gases emissions from waste streams	Support	Support as proposed.	Retain as notified.
S140.0104	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 22: Integrated hazard risk management and climate change adaptation planning	Support in part	For integrated management across the region, the integrated hazard risk management and climate change adaptation planning should be led by Regional Council.	Amend Method 22 so that it does not apply to city and district councils.
S140.0105	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 31: Protocol for management of earthworks and air quality between local authorities	Support	Support as proposed.	Retain as notified.
S140.0106	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the	Support	Support as proposed.	Retain as notified.

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		community in the identification and protection of significant values			
S140.0107	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 33: Identify sustainable energy programmes	Support	Support as proposed.	Retain as notified.
S140.0108	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support in part	Water allocation and efficiency is Regional Council responsibility.	Amend Method 34 so that it does not apply to city and district councils.
S140.0109	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 35: Prepare a regional stormwater action plan	Support	Support as proposed.	Retain as notified.
S140.0110	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 40: Sign the New Zealand Urban Design Protocol	Support	Support as proposed.	Retain as notified.
S140.0111	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 46: Develop complex development opportunities	Support	Support as proposed	Retain as notified.
S140.0112	Chapter 4.5: Methods to implement	Method CC.4: Prepare a regional	Support in part	Clarify intention of method, if it is to reduce sediment loading in waterbodies then this should be actioned by Regional Councils.	Amend Method CC.4 so that it does not apply to City and District Councils.

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	policies (non-regulatory methods)	forest spatial plan			
S140.0113	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	Support in part	As City and District Councils are likely to be implementing the Indigenous Biodiversity effects management hierarchy, the inventory should be worked on collaboratively.	Amend to include City and District Councils.
S140.0114	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Support	Support as proposed.	Retain as notified.
S140.0115	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	Support	Support as proposed.	Retain as notified.
S140.0116	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support in part	Requiring just the consideration of rates rebates is restrictive and may not necessarily be the best option to assist landowners to maintain, enhance and restore indigenous ecosystems.	Assist landowners to maintain, enhance and/or restore indigenous ecosystems identified by Methods IE.2 and CC.7, including by, but not limited to: (a) assisting with the costs of legally protecting indigenous ecosystems by way of open space covenants with Queen Elizabeth the Second National Trust (QEII); (b) considering opportunities for rates rebates; (b) considering opportunities for an incentive packages; (c) assisting with the costs of controlling pest plants and

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					animals; and (d) supporting landowners to restore significant indigenous ecosystems by fencing and planting
S140.0117	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 56: Assist the community to reduce waste and use water and energy efficiently	Support	Support as proposed.	Retain as notified.
S140.0118	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	General comments - anticipated environmental results	Oppose in part	NA	Consequential amendments to reflect relief sought on related provisions.
S140.0119	Appendix 3: Definitions	Climate change adaptation	Support in part	Definition is confusing and does not allow for a better understanding of what the RPS is aiming to achieve	Clarify definition
S140.0120	Appendix 3: Definitions	Climate change mitigation	Support in part	Definition is confusing and does not allow for a better understanding of what the RPS is aiming to achieve	Amend: Human actions to reduce emissions from entering the atmosphere by sources or enhance the removals by sinks of greenhouse gases. Examples of reducing emissions by sources include walking instead of driving, or replacing a coal boiler with a renewable electric powered one. Examples of enhancing removals by sinks include growing new trees to absorb carbon, promoting and providing for active transport, and increasing public transport services and affordability.
S140.0121	Appendix 3: Definitions	Ecological connectivity	Support in part	The current definition of "ecological connectivity" is confusing and does not provide a clear meaning for the term.	Amend: Refers to the degree of connection that provides for the

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				It also ignores the Exposure Draft NPS-IB's definition of 'connectivity' which should replace the current definition	movement of genetic alleles and species and the maintenance of ecosystem processes within and between populations and ecosystems. To the definition of connectivity used in the Exposure Draft National Policy Statement for Indigenous Biodiversity: "refers to the structural or functional links or connections between habitats and ecosystems that provide for the movement of species and processes among and between the habitats or ecosystems"
S140.0122	Appendix 3: Definitions	High density development	Support in part	The height limits go further than the NPS-UD and proposes unnecessary rigidity.	Means areas used predominately for commercial, residential or mixed-use activities with high concentration and bulk of buildings, such as apartments, and other compatible activities. with a minimum building height of 6 stories.
S140.0123	Appendix 3: Definitions	Hydrological controls	Support in part	Definition of 'Hydrological controls' does not provide a definition, rather it provides guidance for how hydrological controls should be implemented.	Add a new method using the current proposed definition of hydrological controls; and Add a new definition of hydrological controls.
S140.0124	Appendix 3: Definitions	Medium density residential development	Support in part	The height limits go further than the NPS-UD and proposes unnecessary rigidity.	Means areas used predominately for residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible commercial and mixed-use activities. with a minimum building height of 3 stories.
S140.0125	Appendix 3: Definitions	Nature-based solutions	Support in part	Actions such as planting street trees and water sensitive urban design are not enhancing natural ecosystems as they are often isolated from other areas of biodiversity and serve a different function than the 'natural ecosystem' would perform. The definition should not include examples as that should be incorporated into the implementation (method) of the policy.	Amend: Actions to protect, enhance, mimic , 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, indigenous biodiversity and the natural environment to the effects of climate change.
S140.0126	Appendix 3: Definitions	Travel demand management plan	Support in part	Part of the definition reads as policy and should be incorporated into the relevant policy/method or be removed.	Amend: A travel demand management plan sets out interventions and actions to influence travel behaviour, with the aim of minimising travel demand or redistributing demand from traditional car

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					usage to more sustainable transport modes for new subdivision, use and development. A travel demand management plan should include mitigation measures that so that planned subdivision, use and development is designed and implemented to maximise quality of life for people without access to a private vehicle, reducing the demand for vehicle trips and associated externalities like greenhouse gas emissions. For example, a travel demand management plan for a new retail development might promote cycle parking facilities and a delivery service, as an intervention to promote travel with low carbon emissions.
S140.0127	Appendix 3: Definitions	Urban areas	Support in part	To be consistent with the wording and intent of the NPSUD 2020.	Urban areas The region's urban areas (as at February 2009) include residential zones, commercial, mixed use zones, and industrial zones and Future Development Areas identified in the Wellington city, Porirua city, Lower Hutt city, Upper Hutt city, Kāpiti coast and Wairarapa combined district plans.
S140.0128	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	For greater clarity, add a definition of 'Natural Ecosystem'.	Add: Definition of Natural Ecosystem
S140.0129	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	For greater consistency, add a definition of 'undeveloped state'.	Add: Definition of Undeveloped State
S140.0130	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	For greater consistency, add a definition of 'Resilience (in relation to climate change)'.	Add: Definition of resilience (in relation to climate change)
S140.0131	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	For greater clarity, add a definition of 'Low Carbon Emissions Transportation Mode'.	Add: Definition of Low Carbon Emissions Transportation Mode
S140.0132	Appendix 3: Definitions	General comments - definitions	Support	For greater clarity, add a definition of 'Zero Carbon Emissions Transportation mode'.	Add: Definition of Zero Carbon Emissions Transportation mode

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S147 Wellington Fish and Game Council					
S147.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	General comments - Chapter 3	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.003	Chapter 3.1A: Climate change	Issue 2: Climate change and the decline of ecosystem health and biodiversity are inseparably intertwined	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.004	Chapter 3.1A:	Issue 3: The risks associated	Support	Necessary to give effect to the NPS-FM.	Retain as notified.

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	Climate change	with natural hazards are exacerbated by climate change			
S147.005	Chapter 3.1A: Climate change	Issue 5: Climate change threatens tangible and spiritual components of Māori well-being	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.006	Chapter 3.1A: Climate change	Table 1A: Climate change objectives and titles of policies and methods to achieve the objectives	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.007	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	<p>Strongly supports all six principles of Te Mana o te Wai and their inclusion in the RPS.</p> <p>Strongly supports the prioritisation of interests and outcomes as set out in accordance with the objective in Part 2.1 of the NPS-FM.</p> <p>The concept of Te Mana o te Wai forms the fundamental underpinning of the NPS-FM. In accordance with Part 3.2(1) of the NPS-FM, GWRC must engage with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region. Concerned that, as drafted, Objective 12 falls short of what is required under the NPS-FM. It fails to articulate a clear objective as to what the application of Te Mana o te Wai means in the GWR and to give the overarching guidance expected from an RPS.</p> <p>Support the statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa. Those Statements, along with the view of the community and other stakeholders, are vital to a proper understanding and implementation of Te Mana o te Wai. However, the statement on p. 31 that these Statements "form</p>	Replace Objective 12 with a single, integrated, and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the Greater Wellington Region.

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				part of [Objective 12]" creates significant potential for confusion between the Objectives and Policies outlined in the iwi Statements and those contained in the RPS itself. This is particularly the case as elements of the iwi Statements go beyond the scope of GWRC's functions. Recommends significant reconsideration of the current approach to Objective 12 with a view to the development of a single, integrated, and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the GWR.	
S147.008	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies - regional plans	Support in part	Strongly support the proposed changes to Policy 12 to give effect to the NPS-FM. However, Proposed Change 1 does not incorporate a long-term vision for freshwater as set out in Section 3.3 of the NPS-FM. In the absence of a clear long-term vision in the RPS it is not clear how paragraph (b) of the proposed changes to Policy 12 will operate.	Seek clarification of paragraph (b): "achieve the long-term visions for freshwater;".
S147.009	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM. The proposed amendments are necessary to give effect to Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.	Insert new subclause in Policy 40 as follows: (fa) avoiding the loss of river extent and values;
S147.010	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM. The proposed amendments are necessary to give effect to Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.	Insert new subclause in Policy 40 as follows: (ha) protecting the habitats of indigenous freshwater species, trout and salmon;
S147.011	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing	Support in part	Supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM. The proposed amendments are necessary to give effect to	Insert new subclause in Policy 40 as follows: (ma) ensuring that there is no further loss of natural inland

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		the health and well-being of water bodies and freshwater ecosystems - consideration		Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.	wetlands and their values are protected;
S147.012	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Strongly support the expansion and redrafting of Policy 18 to give effect to the NPS-FM. However, as drafted the proposed changes to Policy 18 do not give proper effect to :</p> <ul style="list-style-type: none"> • Policy 6 of the NPS-FM, regarding the protection of natural inland wetlands; and • Policy 10 of the NPS-FM, which specifically recognises the need for the protection of the habitats of trout and salmon. <p>The suggested amendments are intended to address this deficiency.</p> <p>The habitat of valued introduced species such as trout and salmon is given specific recognition under s 7(h) the RMA (1991), which carries through to Policy 10 of the NPS-FM. This reflects the fact that the protection of trout and salmon habitats acts as an umbrella to protect the habitats of a wide range of indigenous species due to the biological requirement of salmonids for abundant cool, clean, water with a wide range of natural river forms (such as deep pools, riffles, runs, and backwater eddies). Consistent with this, trout are utilised in the Fish Index of Biotic Integrity as an indicator species for freshwater ecosystem health.</p> <p>The removal of protections for the habitat of these species significantly reduces the ability of regional plans and policies to reduce adverse harm to the environment.</p>	new subclause(ea) ensuring that there is no further loss of natural inland wetlands and their values are protected;
S147.013	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Trout and salmon is given specific recognition under s 7(h) the RMA (1991), which carries through to Policy 10 of the NPS-FM. This reflects the fact that the protection of trout and salmon habitats acts as an umbrella to protect the habitats of a wide range of indigenous species due to the biological requirement of salmonids for abundant cool, clean, water with a wide range of natural river forms (such as deep pools, riffles, runs, and backwater eddies). Consistent with this, trout are utilised in the Fish Index of Biotic Integrity as an indicator species for freshwater ecosystem health.</p> <p>The removal of protections for the habitat of these species significantly reduces the ability of regional plans and policies to reduce adverse harm to the environment.</p>	Amend. "(g) protecting the habitats of indigenous freshwater species and the habitats of trout and salmon insofar as this is consistent with the protection of the habitats of indigenous freshwater species are protected; "

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S147.014	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	Oppose	Proposed Change 1 to replace "coastal environment, rivers, lakes and wetlands" with "indigenous ecosystems" in Method 53 is unclear and inappropriately narrow. It is also unnecessary to give effect to the NPS-FM. Restricting Method 53 to "indigenous ecosystems" excludes the habitats of valued introduced species such as trout, salmon, and gamebirds. Narrowing the focus of Method 53 as proposed: <ul style="list-style-type: none"> • will introduce potential adverse environmental effects (such as trophic cascades); • adopts a values-based approach to policies and management rather than science based; and • does not give effect to Policy 10 of the NPS-FM 	Retain original drafting without changes in Proposed Change 1. OR Amend to read: "Support mana whenua/tangata whenua and community restoration initiatives for indigenous coastal and freshwater ecosystems."
S147.015	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Strongly support the proposed changes to Policy 44 in order to give effect to the NPS-FM and incorporate the concept of Te Mana o te Wai. However, as drafted the proposed changes to Policy 44 do not give proper effect to Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout, and salmon. The suggested amendment is intended to address this deficiency.	new subclause: (ba) The habitats of indigenous freshwater species, trout and salmon are protected; "
S147.016	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Strongly support the inclusion of new Policy FW.3 to give effect to the NPS-FM. However, as drafted proposed new Policy FW.3 does not give proper effect to: <ul style="list-style-type: none"> • Policies 6 and 7 of the NPS-FM, regarding the protection of river extent and values and natural inland wetlands; and • Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout and salmon. The suggested amendments are intended to address this deficiency.	Amend. (k) Require that urban development is located and designed to avoid the loss of river extent and values and natural inland wetlands, and to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;"
S147.017	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Strongly support the inclusion of new Policy FW.3 to give effect to the NPS-FM. However, as drafted proposed new Policy FW.3 does not give proper effect to: <ul style="list-style-type: none"> • Policies 6 and 7 of the NPS-FM, regarding the protection of river extent and values and natural inland wetlands; and • Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout and salmon. The suggested amendments are intended to address this deficiency.	New subclause: (ka) Require that urban development is located and designed to protect the habitats of indigenous freshwater species, trout and salmon;
S147.018	Chapter 3.6: Indigenous ecosystems	Indigenous ecosystems	Support in part	Proposed Change 1 to replace "loss of species, loss of overall diversity of species, loss of an ecosystems ability to function on an ongoing basis, and loss of complete ecosystems and types	Amend the 'Ecosystem health' paragraph. Ecosystem health can be measured in a number of ways, including the composition, richness and indigenous

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		introductory text		<p>of ecosystems" with "the composition, richness and indigenous dominance of communities, functions of ecosystem processes, or the extent of the ecosystem remaining" in Chapter 3.6 Introduction is unclear and inappropriately narrow. It is also unnecessary to give effect to the NPS-FM.</p> <p>Restricting the Chapter 3.6 Introduction as proposed excludes the habitats of valued introduced species such as trout, salmon, and gamebirds, and;</p> <ul style="list-style-type: none"> • will introduce potential adverse environmental effects (such as trophic cascades); • adopts a values-based approach to policies and management rather than science based; and • does not give effect to Policy 10 of the NPS-FM 	dominance of valued indigenous and introduced species communities, function of ecosystem processes (e.g., degree to which it is connected or fragmented), or the extent of the ecosystem remaining.
S147.019	Chapter 3.6: Indigenous ecosystems	Objective 16	Support in part	<p>Supports the broadening of this objective beyond indigenous ecosystems and habitats.</p> <p>A focus on indigenous biodiversity, habitat, and ecosystems at the expense of other valuable habitats fails to give proper effect to the NPS-FM, and the recognition in Part 3.5(1)(a) of the NPS-FM of the interconnectedness of the whole environment. That recognition is in turn reflected in the attributes of ecosystem health in Appendix 1.A of the NPS-FM, which do not distinguish between indigenous and other valued habitats.</p> <p>As drafted, however, Proposed Change 1 does not give proper effect to Policy 10 of the NPS-FM which specifically recognises the need to protect the habitat of trout and salmon. The suggested amendment addresses this deficiency.</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those habitats containing valued introduced species.</p> <p>An unduly narrow Indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. Even ecosystems that may not be considered to be "indigenous dominant", can play a significant role in the restoration of indigenous biodiversity. They are also important for the maintenance of valued non-indigenous species, such as trout, salmon, and gamebirds. The loss of protections, enhancements, and restorations of these habitats risks adverse environmental effects and weakened climate change resilience for the region.</p>	Amend. Indigenous ecosystems, and habitats which support significant ecosystem functions, services, valued species and/ or biodiversity values, are protected, enhanced, and restored to a healthy functioning state.
S147.020	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats	Support in part	<p>The suggested amendments follows from the suggested amendment to Objective 16, and are intended to give better effect to the NPS-FM (including Policy 10).</p> <p>It is important to identify which habitats have strong indigenous biodiversity values. It is equally important to recognise that other</p>	Amend title: Identifying indigenous ecosystems, and habitats with significant indigenous biodiversity or other values, in district and regional plans

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		with significant indigenous biodiversity values - district and regional plans		habitats, while not indigenous dominant, are valuable and require identification and also protection.	
S147.021	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	The suggested amendments follows from the suggested amendment to Objective 16, and are intended to give better effect to the NPS-FM (including Policy 10). It is important to identify which habitats have strong indigenous biodiversity values. It is equally important to recognise that other habitats, while not indigenous dominant, are valuable and require identification and also protection.	Amend text: By 30 June 2025, district and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity and other values; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:
S147.022	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	The suggested amendments follows from the suggested amendment to Objective 16, and are intended to give better effect to the NPS-FM (including Policy 10). It is important to identify which habitats have strong indigenous biodiversity values. It is equally important to recognise that other habitats, while not indigenous dominant, are valuable and require identification and also protection.	New subclause: (f) The habitat supports significant populations of trout, salmon or other valued introduced species together with indigenous species.
S147.023	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and	Support in part	The suggested amendment is intended to give better effect to the NPS-FM (including Policy 10). While the protection of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse	Amend title and text: Policy 24: protecting indigenous ecosystems, and habitats with significant biodiversity or other values, in district and regional plans By 30 June 2025, district and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity or other values from inappropriate subdivision, use and development. Where the policies

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		regional plans		environmental effects and weakened climate change resilience for the region.	and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity or other values, they shall:
S147.024	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support in part	Supports the special role of mana whenua as Treaty partners and kaitiaki. At the same time, GWRC has a responsibility to work alongside recognised stakeholders - such as WFGC as the statutory manager of freshwater species and habitats. The amendments to the title and chapeau of Method 32 reflect this responsibility.	Amend policy title and text: Policy 32: Partnering with mana whenua/tangata whenua and engaging with stakeholders, and engaging with landowners and the community in the identification and protection of significant values. Partner with iwi, hapū, marae and/or whānau, and engage with stakeholders, and engage with landowners and the community to:
S147.025	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	Support in part	The suggested amendments to paragraph (c) and the suggested new paragraph (f) give effect to Policies 9 and 10 of the NPS-FM, which are not properly implemented in Proposed Change 1 as drafted.	Amend subclause: (c) identification and protection of indigenous ecosystems and habitats with significant biodiversity or other values, including those of significance to mana whenua / tangata whenua;
S147.026	Chapter 4.5: Methods to implement	Method 32: Partnering with mana	Support in part	The suggested amendments to paragraph (c) and the suggested new paragraph (f) give effect to Policies 9 and 10 of	New subclause: (f) identifying and protecting the habitats of indigenous freshwater species, trout and salmon

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	policies (non-regulatory methods)	whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values		the NPS-FM, which are not properly implemented in Proposed Change 1 as drafted.	
S147.027	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policies 9 and 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening of protections for non-indigenous dominant systems and the subsequent adverse environmental effects on these (and the whole system).</p>	<p>Amend title and text: Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity and other values - consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity or other values, and in determining whether the proposed activity is inappropriate particular regard shall be given to:</p>
S147.028	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policies 9 and 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening of protections for non-indigenous dominant systems and the subsequent adverse environmental effects on these (and the whole system).</p>	<p>new subclause:(j) protecting the habitats of indigenous freshwater species, trout, and salmon.</p>

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S147.029	Chapter 3.6: Indigenous ecosystems	Objective 16A	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	<p>Amend.</p> <p>The region's indigenous ecosystems, and habitats with significant biodiversity or other values, are maintained, enhanced and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.</p>
S147.030	Chapter 3.6: Indigenous ecosystems	Objective 16B	Support in part	<p>Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for in decision-making and their role as kaitiaki is supported. At the same time, to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats.</p>	<p>Amend.</p> <p>Mana whenua/tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are recognised and provided for in decision making..</p> <p>Mana whenua/tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity within a wider framework of equal weighting given to community values around indigenous and valued introduced biodiversity.</p>
S147.031	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	<p>Amend title and text:</p> <p>Method 54: Assist landowners to maintain, enhance, and restore indigenous ecosystems and habitats with significant biodiversity or other values.</p> <p>Assist landowners to maintain, enhance and/or restore indigenous ecosystems and habitats with significant biodiversity or other values identified by Methods IE.2 and CC.7, including by, but not limited to:</p>
S147.032	Chapter 4.5: Methods to implement	Method 54: Assist landowners	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, and is intended to give better effect to the NPS-FM (including Policy 10).</p>	<p>amend subclause:</p> <p>(d) supporting landowners to restore significant indigenous ecosystems and habitats with significant</p>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	policies (non-regulatory methods)	to maintain, enhance and restore indigenous ecosystems		While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	biodiversity or other values by fencing and planting.
S147.033	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	Support	Note the typographical errors pp. 173 and 191, which read: "Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions". These should be amended to read as per pp. 64.	Ensure wording on page 64, 173 and 191 are consistent. Retain as notified.
S147.034	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported. At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords Regional Councils responsibility for "maintaining" rather than "managing" indigenous biodiversity.	Amend title Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing maintaining indigenous biodiversity - district and regional plans
S147.035	Chapter 4.1: Regulatory policies	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous	Support in part	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported. At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords	amend subclause: (a) apply mātauranga Māori frameworks, and support mana whenua / tangata whenua to exercise their kaitiakitanga, in managing maintaining and monitoring indigenous biodiversity within a wider framework of equal weighting given to community values around indigenous and valued introduced biodiversity;

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		biodiversity - district and regional plans		Regional Councils responsibility for "maintaining" rather than "managing" indigenous biodiversity.	
S147.036	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support in part	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported. At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords Regional Councils responsibility for "maintaining" rather than "managing" indigenous biodiversity.	Amend title: Policy IE.2: Giving effect to mana whenua/tangata whenua role and values when managing maintaining
S147.037	Chapter 4.2: Matters to be considered	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support in part	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported. At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords Regional Councils responsibility for "maintaining" rather than "managing" indigenous biodiversity.	Amend subclause (a) providing for mana whenua / tangata whenua values associated with indigenous biodiversity, including giving local effect to Te Rito o te Harakeke, within a wider framework of equal weighting given to community values around indigenous and valued introduced biodiversity
S147.038	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	amend title and text Policy IE.3: Maintaining and restoring indigenous ecosystem health the health of indigenous ecosystems and habitats with significant biodiversity or other values. To maintain, enhance and restore the ecosystem health, ecological integrity and ecological connectivity of the region's indigenous ecosystems, and habitats with significant biodiversity or other values , and the ecological processes that support them, giving effect to Te Rito o te Harakeke, the Regional Policy Statement shall, as soon as practicable:

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S147.039	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	<p>amend subclause: (a) identify the characteristics required for the region's indigenous ecosystems and habitats with significant biodiversity or other values to be in a healthy functioning state, including the processes that enable them to persist over the long-term, and</p>
S147.040	Chapter 4.4: Non-regulatory policies	Policy IE.3: Maintaining, enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	<p>amend subclause (b) identify strategic targets and priorities to ensure that management and restoration of indigenous ecosystems and habitats with significant biodiversity or other values (including pest management) are directed at areas [etc.]..."</p>
S147.041	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	<p>amend title: Policy IE.4: Recognising the roles and values of landowners and communities in the management maintenance and restoration of indigenous biodiversity and habitats with significant biodiversity or other values - non-regulatory</p>
S147.042	Chapter 4.4: Non-	Policy IE.4: Recognising the roles and	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p>	<p>Amend policy text Recognise and provide for the values of landowners and communities as stewards of the indigenous biodiversity of</p>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	regulatory policies	values of landowners and communities in the management of indigenous biodiversity - non-regulatory		While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	the Wellington Region, by:"
S147.043	Chapter 4.4: Non-regulatory policies	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	amend subclauses: (a) involving communities in the identification of targets and priorities for protecting, enhancing and restoring indigenous biodiversity and habitats with significant biodiversity or other values; and (b) supporting landowner and community restoration of indigenous ecosystems and habitats with significant biodiversity or other values."
S147.044	Chapter 3.8: Natural hazards	Natural hazards introductory text	Support	Necessary to give effect to the NPS-FM	Retain as notified
S147.045	Chapter 3.8: Natural hazards	Objective 20	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	amend. Natural hazard and climate change mitigation and adaptation activities minimise the risks from natural hazards and impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, and indigenous and valued introduced ecosystems and biodiversity.
S147.046	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support	Necessary to give effect to the NPS-FM	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S147.047	Chapter 3.9: Regional form, design and function	Objective 22	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	<p>amend subclause: (e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous and valued introduced biodiversity</p>
S147.048	Chapter 3.9: Regional form, design and function	Objective 22B	Support	Necessary to give effect to the NPS-FM	Retain as notified
S147.049	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified.
S147.050	Chapter 4.1: Regulatory policies	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified
S147.051	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate	Support	Necessary to give effect to the NPS-FM	Retain as notified

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		change - district and regional plans			
S147.052	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified
S147.053	Chapter 4.1: Regulatory policies	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified
S147.054	Chapter 4.1: Regulatory policies	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified
S147.055	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Acknowledge the need to amend Policy 18 to give effect to the NPS-FM and incorporate the concept of Te Mana o te Wai. However, as drafted the proposed changes to Policy 18 do not give proper effect to Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout, and salmon. The suggested amendment is intended to address this deficiency. It is also important to acknowledge the habitat of valued introduced species such as trout and salmon is given specific recognition under s 7(h) the RMA (1991), which has been carried through to Policy 10 of the NPS-FM.	Amend subclause & correct typographical errors: (g) protecting the habitats of indigenous species, and the habitats of trout and salmon freshwater species are protected

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S147.056	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.057	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.058	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.059	Chapter 4.1: Regulatory policies	Policy FW.4: Financial contributions for urban development - district plans	Support in part	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.060	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.061	Chapter 4.1: Regulatory policies	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S147.062	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.063	Chapter 4.2: Matters to be considered	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.064	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.065	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.066	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.067	Chapter 4.2: Matters to	Policy 41: Controlling	Support	Necessary to give effect to the NPS-FM.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	be considered	the effects of earthworks and vegetation disturbance - consideration			
S147.068	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Necessary to give effect to the NPS-FM.	. Retain as notified.
S147.069	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.070	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Strongly support the proposed changes to Policy 52 and the incorporation of the concept of Te Mana o Te Wai in paragraph (e). However, hazard mitigation measures such as stop banks or weirs can interfere significantly with the habitat of indigenous freshwater species, trout, and salmon, and have significant impacts on the extent and values of both rivers and wetlands. This is not fully captured in paragraph (e) as drafted. The suggested amendments address this issue and is intended to give better effect to the NPS-FM Policies 6, 7, 9 and 10.	amend subclause: (e) adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity and habitats of indigenous freshwater species, trout, and salmon;
S147.071	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Strongly support the proposed changes to Policy 52 and the incorporation of the concept of Te Mana o Te Wai in paragraph (e). However, hazard mitigation measures such as stop banks or weirs can interfere significantly with the habitat of indigenous freshwater species, trout, and salmon, and have significant impacts on the extent and values of both rivers and wetlands. This is not fully captured in paragraph (e) as drafted. The suggested amendments address this issue and is intended to give better effect to the NPS-FM Policies 6, 7, 9 and 10.	new subclause: (ea) ensuring that there is no further loss of natural inland wetlands or river extent and their values are protected

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S147.072	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.073	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.074	Chapter 4.3: Allocation of responsibilities	Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.075	Chapter 4.3: Allocation of responsibilities	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.076	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.077	Chapter 4.4: Non-regulatory policies	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.078	Chapter 4.4: Non-	Policy CC.18: Increasing regional	Support	Necessary to give effect to the NPS-FM.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	regulatory policies	forest cover to support climate change mitigation: "right tree-right place" - non-regulatory			
S147.079	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.080	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.081	Chapter 4.4: Non-regulatory policies	Policy FW.8: Land use adaptation - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.082	Chapter 4.4: Non-regulatory policies	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S147.083	Chapter 4.5: Methods to	Method IE.4: Kaitiaki	Support	Look forward to working in partnership with tangata whenua and support resourcing of kaitiaki programmes to assist in achieving	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (non-regulatory methods)	indigenous biodiversity monitoring		positive environmental outcomes for our valued freshwater species.	
S147.084	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 1: District plan implementation	Support in part	In general supports the amendment of district plans to implement policies after the policies listed here have been amended or agreed on.	Amend the following policies prior to integrating into district plans: Policy FW.3, Policy 23, Policy 24, Policy IE.1.
S147.085	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 2: Regional plan implementation	Support in part	In general supports the amendment of district plans to implement policies after the policies listed here have been amended or agreed on.	Amend the following policies prior to integrating into district plans: Policy 12, Policy 18, Policy 23, Policy 24, Policy IE.1.
S147.086	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 4: Consideration - resource consents, notices of requirement and when changing, varying or reviewing plans	Support in part	In general supports the amendment of district plans to implement policies after the policies listed here have been amended or agreed on.	Amend the following policies prior to integrating into district plans: Policy 40, Policy 47, Policy 52, Policy IE.1.
S147.087	Chapter 4.5: Methods to implement policies (regulatory methods)	Method 5: Allocation of responsibilities	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.088	Chapter 4.5: Methods to implement policies (regulatory methods)	Method FW.1: Freshwater Action Plans	Support in part	Disappointed that implementation of the NOF contained in Part 3, Subpart 2, of the NPS-FM has been deferred. Without full implementation of this framework Proposed Change 1 fails to give effect to this central element of the NPS-FM, which is urgently required to avoid adverse effects on the environment. Considers that Freshwater Action Plans must be adopted as a matter of priority and absolutely no later than December 2026 deadline proposed. Further supports the intention to ensure that mana whenua/tangata whenua values are properly recognised and provided for in the Action Plans and their role as kaitiaki is	Amend. Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua and stakeholders, and in consultation with landowners and community , as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP, for each whaitua no later than December 2026. [etc]..."

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				supported. At the same time, however, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment is intended to achieve this outcome.	
S147.089	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.1: Partnering with mana whenua / tangata whenua to give local effect to Te Rito o te Harakeke	Support in part	Support the intention to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported. At the same time, however, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats.	amend. Partner with mana whenua / tangata whenua and stakeholders, and engage with landowners and community , to identify the local approach to give effect to Te Rito o te Harakeke and develop guidance on how to implement this.
S147.090	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method UD.1: Development manuals and design guides	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.091	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.1: Integrated management - ki uta ki tai	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.092	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IM.2: Protection and interpretation of Mātauranga Māori and Māori data	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.093	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Support	Necessary to implement the NPS-FM.	Retain as notified.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S147.094	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 30: Implement the harbour and catchment management strategy for Porirua Harbour	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.095	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.096	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 46: Develop complex development opportunities	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.097	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.4: Prepare a regional forest spatial plan	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.098	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method CC.6: Identifying nature-based solutions for climate change	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	<p>Amend.</p> <p>Provide resilience for indigenous and valued introduced biodiversity from the impacts of climate change, enabling ecosystems and species to persist or adapt..."</p>
S147.099	Chapter 4.5: Methods to	Method IE.2: Inventory of	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give	<p>Amend.</p> <p>Partner with mana whenua / tangata whenua and</p>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	implement policies (non-regulatory methods)	biodiversity offsetting and biodiversity compensation opportunities		<p>better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	stakeholders , and engage with interested parties to develop a regional inventory of opportunities for offsetting or compensating for any residual adverse effects on ecosystems and habitats with significant indigenous or valued introduced biodiversity values
S147.0100	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method IE.3: Regional biodiversity strategy	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	Amend. Develop and implement, in partnership with mana whenua / tangata whenua and in collaboration with territorial authorities, communities and other key stakeholders, a regional biodiversity strategy to maintain and restore indigenous and valued introduced biodiversity at a landscape scale, incorporating both Maturanga Maori and systematic conservation planning."
S147.0101	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.0102	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 48: Water allocation policy review	Support	Necessary to implement the NPS-FM.	Retain as notified.
S147.0103	Chapter 4.5: Methods to	Method CC.8: Programme	Support	Necessary to implement the NPS-FM.	Retain as notified.

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	implement policies (non-regulatory methods)	to support low-emissions and climate-resilient agriculture-non-regulatory methods			
S147.0104	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Integrated Management Anticipated environmental results	Support in part	Support an overarching objective that incorporates: <ul style="list-style-type: none"> • incorporates a Te Ao Māori worldview and Maturanga Māori; and • recognises the holistic nature and interconnectedness of all parts of the natural environment. As drafted, however, the objective lacks: <ul style="list-style-type: none"> • a clear statement of the desired environmental outcomes to be delivered by the proposed approach to integrated management; and • does not reflect the role of the community and other stakeholders. 	Replace objective A with an environmental result such as: 'recognition of the importance of Te Ao Māori and Matuaranga Māori, and collaboration with community and other stakeholders, leads to integrated management of natural resources with a significant stated improvement in community engagement with environmental projects with noted positive environmental improvements.'
S147.0105	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Objective 13 Freshwater Anticipated environmental results	Support in part	Strongly support this objective. However, the statement of environmental outcomes requires amendment in order to fully give effect to the NPS-FM, particularly Policy 10, the emphasis on interconnectedness in Part 3.5, and the attributes in Appendix A.2. The proposed amendments are intended to address this deficiency. In addition, anticipated environmental result 4 is weakly worded, and would benefit from the specification of increased 'valued' species diversity to eliminate the potential for pest species such as gambusia to give false indications of improved biodiversity.	amend. 1. Macro-invertebrate diversity and sensitive macroinvertebrate taxa abundance in rivers and lakes is maintained improving across the Region.
S147.0106	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Objective 13 Freshwater Anticipated environmental results	Support in part	Anticipated environmental result 4 is weakly worded, and would benefit from the specification of increased 'valued' species diversity to eliminate the potential for pest species such as gambusia to give false indications of improved biodiversity.	amend. 4. Existing fish habitat, fish populations and the diversity of valued fish fauna is maintained or increased across the region.

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S147.0107	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Objective 13 Freshwater Anticipated environmental results	Support in part	Strongly support this objective. However, the statement of environmental outcomes requires amendment in order to fully give effect to the NPS-FM, particularly Policy 10, the emphasis on interconnectedness in Part 3.5, and the attributes in Appendix A.2. The proposed amendments are intended to address this deficiency. In addition, anticipated environmental result 4 is weakly worded, and would benefit from the specification of increased 'valued' species diversity to eliminate the potential for pest species such as gambusia to give false indications of improved biodiversity.	amend. 5. There is no loss of the significant amenity and recreational values or significant indigenous ecosystems and habitats with significant biodiversity or other values associated with the rivers and lakes identified in Appendix 1.
S147.0108	Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results	Objective 14 Freshwater Anticipated environmental results	Support	Necessary to implement the NPS-FM	Retain as notified.
S147.0109	Appendix 3: Definitions	Restoration	Oppose	Re-wording this definition to include valued ecosystem properties and species, whether indigenous or introduced, captures a wider range of important physical and ecological attributes for protection and restoration.	Amend. The active intervention and management of modified or degraded habitats, ecosystems, landforms and landscapes in order to reinstate indigenous -natural character, indigenous and valued ecological and physical processes, and cultural and visual qualities. The aim of restoration actions is to return the environment, either wholly or in part, to a desired former state, including reinstating the supporting ecological processes.
S147.0110	Appendix 3: Definitions	Te Rito o te Harakeke	Support	Values, supports, and acknowledges the web of interconnectedness between indigenous species, ecosystems, the wider environment, and the community.	Retain as notified.

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S148 Wellington International Airport Ltd (WIAL)					
S148.001	General comments	General comments - overall	Not Stated / Neutral	<p>It is appropriate that the RPS continues to recognise the importance of the Airport in providing for the social, economic and cultural wellbeing of people and communities.</p> <p>Functional, technical, operational and safety related constraints often influence the location of important infrastructure, such as airports. In the case of Wellington Airport, given the lack of suitable alternative locations, providing for the ongoing operation, development and growth of Wellington Airport in its current location and safeguarding the Airport's obstacle limitation surface and aircraft noise boundaries to ensure effective and efficient airport operations is therefore of regional significance.</p>	Not stated.
S148.002	Chapter 3.8: Natural hazards	General comments - natural hazards	Not Stated / Neutral	<p>WIAL is a lifeline utility operator under the CDEM 2002 in respect of its operation of Wellington Airport. In the event of a significant earthquake or other hazard event, the airport is recognised as potentially the only link between the city and the rest of the country given the vulnerability of the road and rail network, and the potential for the port and harbour access to be affected by liquefaction. This further emphasises why it is important to appropriately recognise and provide for Wellington Airport's ongoing operation and development.</p>	Not stated.
S148.003	Chapter 3.1A: Climate change	General comments - climate change	Support in part	<p>A lot of attention has been given within the change to the RPS to reducing emissions, as distinct from adapting to climate change. For an airport, sitting in a bigger context of aviation emissions, there are relatively limited emissions which the airport can control. In contrast, there is a great deal of action that airports can take to address adaptation, giving their direct exposure to severe weather and where the airport or its surrounding infrastructure are close to sea level.</p>	The RPS needs to include sufficient flexibility in the proposed climate change provision so that the Airport can appropriately adapt to the challenges and opportunities that the changing climate will present.
S148.004	Chapter 3.1A: Climate change	General comments - climate change	Not Stated / Neutral	<p>The only thing that is certain about the future of aviation in a low carbon economy is that airports, including Wellington Airport, will need the flexibility to accommodate changes in technology as there is a move toward meeting our nation's net carbon zero 2050 commitment. Local Government's efforts are best placed in facilitating the local development of supporting infrastructure, such as SAF plants, electrical grid improvements and commercial hydrogen production capabilities, to help make these changes a reality.</p>	Not stated.
S148.005	Chapter 3.4: Fresh water (including	General comments - fresh water	Support	<p>There are a number of new freshwater related objectives and policies within the change to the RPS which seek to give effect to the National Policy Statement for Freshwater Management 2020 ("NPSFM"). Some of the provisions however</p>	Any reference to the coastal marine area / coastal environment is deleted from those provisions which seek to directly give effect to the NPSFM.

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	public access)			also refer to the coastal marine area / coastal environment. WIAL is concerned that this will result in the management of the coastal resources which is inconsistent with the New Zealand Coastal Policy Statement ("NZCPS") and the remaining sections of the RPS which are not subject to this Proposal. It will also apply freshwater management concepts to the coastal marine area and the coastal environment which is not appropriate.	
S148.006	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Not Stated / Neutral	It appears that pursuant to Appendix 1A there are limits on biodiversity offsetting and compensation for certain species. The provisions of the RPS appear to then 'rule out' offsetting and compensation when even individual specimens of a species, or even part of their habitat will be lost due to a project, irrespective of whether the loss may in ecological terms be capable of being offset or compensated to produce a net gain. In the case of the Airport, and for activities such as the ongoing protection of physical assets and infrastructure, it may not always be possible to avoid impacts to habitats or certain species (e.g. giant kelp may be present in and around the sea wall and end of the runway area where ongoing maintenance is often required to protect the road, cycleway, underground services and runway). Particularly concerned that the changes to the biodiversity provisions within the RPS could unduly constrain development within the Airport environs, including projects which may be necessary to adapt to the ongoing effects of climate change (e.g. sea level rise and associated protection).	The RPS needs to provide clear provisions which properly recognise the significant benefits of existing regionally significant infrastructure, and which enable its protection and adaptation. WIAL is particularly concerned that the changes to the biodiversity provisions within the RPS could unduly constrain development within the Airport environs, including projects which may be necessary to adapt to the ongoing effects of climate change (e.g. sea level rise and associated protection).
S148.007	Chapter 3.8: Natural hazards	General comments - natural hazards	Support in part	Wellington Airport is located near the coast, for example. There needs to be suitable recognition within the natural hazard provisions of the RPS that infrastructure often has a functional or operational requirement to locate in a certain area, even if that area is subject to natural hazard risk. Wellington Airport is located near the coast, for example. Infrastructure providers the RPS needs to suitably recognise that natural hazard tolerance is therefore inherently different to those without the same operational or functional need to be located in such areas.	Amend provisions to address the relief sought in the submission.
S148.008	Chapter 3.8: Natural hazards	General comments - natural hazards	Not Stated / Neutral	NA	The provisions also need to suitably recognise that in some instances hard engineering structures can be an acceptable and most appropriate response to the management and protection of existing infrastructure assets (such as the sea wall adjacent to the south and western airport areas, which protect and support the adjacent road, 3 Waters and Airport infrastructure) and

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					where nature-based solutions are simply not appropriate, including importantly for aircraft safety reasons.
S148.009	Chapter 3.9: Regional form, design and function	General comments - urban development	Not Stated / Neutral	The provisions for the most part are giving effect to the National Policy Statement on Urban Development ("NPSUD"), however the provisions also need to appropriately recognise that in some situations housing developments can be constrained by the "qualifying matters" that are also set out in the NPSUD. This specifically includes areas of land which are subject to designations and the ability to safely and efficiently operate regionally significant infrastructure.	The RPS should also strike a balance in terms of the timing of development so that the provisions do not have the potential to unnecessarily inhibit appropriate development including at the Airport. The Airport is a facilitator of traffic and must take a long term approach to development.
S148.010	General comments	General comments - overall	Support in part	<p>The Proposal contains a number of provisions that have been notified as either using (the usual) Part One Schedule 1 process, or as part of a Freshwater Planning Process ("FPP"). Provisions which are subject to the FPP are annotated throughout the proposal documentation with the reference "FW".</p> <p>This has recently been tested in the Otago region in the High Court. In this case, the Otago Regional Council publicly notified the entirety of its Proposed RPS as a freshwater planning instrument. This was challenged by Forest and Bird and in its judgement (Otago Regional Council v Royal Forest and Bird Protection Society of New Zealand Incorporated [2022] NZHC 1777) dated 22 July 2022, the High Court declared that the Council's determination that the whole of the Proposed RPS is a freshwater planning instrument was wrong. The High Court then instructed the Council to satisfy itself as to which parts of the proposed regional policy statement qualify are part of a freshwater planning instrument because they relate directly to the maintenance or enhancement of freshwater quality or quantity. The Otago Regional Council has recently re-notified the freshwater components of its RPS and these are notably now very narrow in terms of the provisions which are being subject to the FPP.</p> <p>A number of the provisions within the RPS have been identified as progressing through the FPP. For the majority of these provisions, the relationship between freshwater and the provision is reasonably clear, however in some instances it is not. In accordance with the Ministry for the Environment's guidance which provides a high level overview of the FPP, it is understood that it was essentially established so as to allow expedited regional plan changes to give effect to the NPSFM, or</p>	Not stated.

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				<p>otherwise relate to freshwater. It is therefore not clear how provisions such as those which more broadly relate to climate change, urban environments, all biodiversity and natural hazards should be progressed through the FPP. WIAL submits that such provisions are either not related to freshwater resources at all or relate to matters which may have some interaction or interplay with freshwater resources but are focussed on outcomes that are much broader.</p>	
S148.011	General comments	General comments - overall	Oppose in part	<p>In the absence of amendments to the RPS to address and give effect to the above submission points and those set out in Annexure A:</p> <p>The Proposal will not promote the sustainable management or efficient use and development of natural and physical resources;</p> <p>The Proposal is not the most appropriate way to achieve the purpose of the RMA, particularly when having regard to the efficiency and effectiveness of the provisions relative to other means;</p> <p>The Proposal does not appropriately fulfil the requirements of section 32 of the RMA, particularly in terms of evaluation the costs of implementing the provisions under section 32(2)(a); and</p> <p>The Proposal does not represent sound resource management practice particularly with respect to planning for Wellington International Airport, as regionally significant infrastructure.</p>	<p>That the submission points contained in Section 4 and Annexure A of the submission be accepted, or that the change to the RPS be amended in a similar or such other way as may be appropriate to address WIAL's submission points; and any alternative, consequential changes (including to methods and anticipated environmental results or other provisions), amendments or decisions that may be required to give effect to the matters raised in WIAL's submission.</p>
S148.012	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	General comments - Chapter 3	Oppose in part	<p>Insert into the overview of issues recognition that infrastructure providers, particularly those which are nationally and regionally significant must be given sufficient flexibility to accommodate changes in technology as we move toward meeting our nation's net carbon zero 2050 commitment. Maintaining the functionality, integrity and adaptability of infrastructure will also be key to achieving community resilience to the challenges of climate change and this needs to be adequately recognised.</p>	<p>Add or amend the issues statement to recognise that key infrastructure assets within the region are vulnerable to the effects of climate change and that such facilities need to be given sufficient flexibility to accommodate new technology, respond and adapt to climate related issues.</p>

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S148.013	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Oppose in part	The expression 'Te Ao Māori' is not defined for the purposes of Objective A and it is not clear what guidance it will provide (or require).	Either define and provide sufficient methodologies to support the intent of this objective or delete
S148.014	Chapter 4.2: Matters to be considered	Policy IM.2: Equity and inclusiveness - consideration	Oppose in part	Considered these to be laudable goals, however it is not clear how they will be applied in a statutory sense under the framework of the Resource Management Act or realistically achievable given the terminology used. For example "not exacerbating" is not something that is consistent with usual resource management practice and requirements.	Delete this policy.
S148.015	Chapter 3.1A: Climate change	Climate change introductory text	Support in part	<p>Recognises that climate change is a significant issue for the Wellington region, New Zealand and the world. On this basis WIAL also seeks that the RPS sufficiently recognises that the RMA is not the primary regulatory tool for dealing with New Zealand's climate change response. This is currently the Climate Change Response Act 2022 (CCRA). The CCRA sets the overarching legal framework to drive domestic emissions reductions to enable New Zealand to meet its international climate change commitments, and to provide a means for identifying and adapting to the effects of climate change that pose a material level of risk to New Zealand now and in the future.</p> <p>The RPS also needs to suitably recognise that the emission trading scheme (ETS) is the cornerstone of New Zealand's climate change regulation. The ETS covers all sectors of the economy, including forestry, liquid fossil fuels used for transport, 'stationary energy' (mainly covering oil and gas used in energy generation), industrial processes, waste, synthetic gases and agriculture. These sectors must report to the Government on their annual greenhouse gas emissions and, with the exception of agriculture, face costs for their emissions via ETS surrender obligations that are imposed on certain persons based on whether they carry out certain prescribed activities in each industry sector.</p>	<p>Amend the issue statement to ensure it is sufficiently sophisticated in recognising that there are many layers of regulation and law in New Zealand (and internationally) which will drive our overall response to climate change and achieving a zero-carbon economy. This includes ensuring there is appropriate reference to the CCRA, ETS and Zero Carbon Amendment Act within the RPS, and the approach taken has appropriate regard to, and is not inconsistent, with the requirements of this legislation including that this legislation does not require a total transition from fossil fuels to renewable energy and that the reduction over time should be what is reasonably practicable in the particular circumstances not what is "possible".</p> <p>Otherwise, delete the Issue Statement.</p>

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				<p>While the ETS has been a 'cap and trade' scheme in name since its inception in 2008, the 'cap' aspect was only formally realised through amendments to the CCRA implemented through the Climate Change Response (Emissions Trading Reform) Amendment Act, effected in June 2020 (Emissions Trading Reform Amendment Act).</p> <p>The Emissions Trading Reform Amendment Act introduced a suite of reforms to align the ETS settings with the net-zero targets and associated five-yearly emissions budgets introduced through the Climate Change Response (Zero Carbon) Amendment Act introduced in November 2019 (Zero Carbon Amendment Act). The intended effect of the ETS is therefore to drive behaviour across the economy away from emissionsintensive technologies and practices, toward 'cleaner' technologies and practices that result in lower (or no) emissions, as these become more economically viable alternatives.</p>	
S148.016	Chapter 3.1A: Climate change	Objective CC.1	Support in part	<p>WIAL generally supports the intent of this objective, however as noted above sufficient flexibility needs to be built into the RPS to ensure infrastructure is not only well planned but has sufficient flexibility to adapt and change its operations in order to respond to climate change.</p>	<p>Amend the objective, as follows (or to similar effect): By 2050, the Wellington Region is a low-emission and climate-resilient region, where climate changemitigation and adaptation are an integral part of: (a) sustainable air, land, freshwater, and coastal management, (b) well-functioning urban environments and rural areas, and (c) well-planned and effectively operating infrastructure.</p>
S148.017	Chapter 3.1A: Climate change	Objective CC.3	Oppose in part	<p>WIAL understands the intent of this objective, however as noted above the RPS needs to adequately recognise that the RMA is not the only vehicle to achieve New Zealand net zero target. As discussed above, the Zero Carbon Amendments Act introduced a framework whereby Emission Reduction Plans are to set out the policies and strategies for meeting the relevant emission budgets. Each Emissions Reduction Plan will set the national policy framework for reducing emissions across the economy through sector-specific and multi-sector strategies. It is noted that for certain industries such as international aviation and shipping, emissions from these activities are not currently included in the net-zero target, but are separately accounted for as part of New Zealand's broader international commitments. The Commission is required under the CCRA to advise by the end of 2024 on whether these should be included in the net-zero target 1. [Note 1 references - Climate Change Response Act, section 5R]</p>	<p>Amend the objective, as follows (or to similar effect), or delete in its entirety: To support New Zealand's pathway to net zero emissions by 2050, align Wellington's regional responses to national legislation and expectations regarding emissions budgeting and outcomes.</p>

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				<p>The national climate change policy framework is complex, and requires consideration of a number of present and future factors that will influence the path New Zealand takes to achieve the required level of emissions reductions to meet its ultimate net-zero emissions target, and five-yearly emissions budgets on the way to 2050. This means that the path is not expected to be linear, and there is uncertainty around the pace and extent of future technological developments that will be needed in each sector. The policy steps taken to meet the 2050 net-zero target and associated emissions budgets would need to be sensitive to such uncertainties, and weigh up what is achievable and economically viable in each period.</p> <p>With regard to the aviation sector for example, the various difficulties recognised by the Commission and the Government in relation to decarbonising heavy transport suggest that it could take some time to overcome the various technological development and supply and cost barriers in order to achieve deeper emissions reductions in the aviation sector. WIAL also submits that airports provide a vital transport link in both business as usual and emergency settings (particularly in the NZ context), and it is important that the RPS provides sufficient flexibility to ensure that the Airport is able to successfully adapt to the effects of climate change in order to achieve long term sustainability of such regionally significant infrastructure.</p>	
S148.018	Chapter 3.1A: Climate change	Objective CC.4	Oppose in part	WIAL seeks that this objective suitably recognises that nature based responses are not always practicable within urban environments, and in some instances may present a direct conflict with the operational and safety of an infrastructure asset (e.g. by attracting birds to the airport surrounds).	Amend the objective as follows, or delete: Where practicable , nature based solutions are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment.
S148.019	Chapter 3.1A: Climate change	Objective CC.6	Support in part	It is not only the resilience of communities and the natural environment that need strengthened resilience against the adverse effects of climate change. Infrastructure, including regionally significant infrastructure can be particularly vulnerable to climate change effects and represents a considerable financial investment that is critical to the resilience of communities. It warrants explicit mention in Objective CC.6.	Amend the objective as follows: Resource management and adaptation planning increase the resilience of communities, infrastructure (including regionally significant infrastructure) and the natural environment to the short, medium, and long-term effects of climate change.
S148.020	Chapter 3.1A: Climate change	Objective CC.7	Support in part	As above, WIAL submits that it is vital that the RPS adequately recognises that infrastructure in particular will need sufficient flexibility to adapt to the needs and effects of climate change. The community should be aware that this may result in changes	Amend the objective as follows: People and businesses understand what climate change means for their future, and the changes that need to be made to adapt to the challenges and

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				to the current footprint or operation of such facilities. Switching to a new low emissions fuel or electrifying aircraft may mean that the airport is required to provide more space to accommodate smaller, more numerous aircraft or larger, more efficient aircraft, or require more space to install new technology for charging etc.	opportunities of climate change and are actively involved in planning and implementing appropriate mitigation and adaptation responses. <i>[Note: end of amendment]</i> Or otherwise delete the objective.
S148.021	Chapter 4.1: Regulatory policies	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	As set out above it may take some time to develop the strategies that are necessary to achieve zero emissions in the aviation sector. It would therefore be inappropriate if this policy were to extend to air transportation.	Amend the policy to ensure it relates to land transportation infrastructure, rather than inadvertently capturing all modes of transportation.
S148.022	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Oppose in part	WIAL is actively involved in initiatives such as the Let's Get Wellington Moving programme to improve connectivity between the airport and key nodes and realise the potential to shift to more sustainable travel modes. This seeks to deliver a 'whole of system' approach that encompasses a range of measures which work together to improve transport access and associated levels of service as well as increasing sustainability. Against this background, WIAL seeks that policy such as CC.2 would not inadvertently require the airport to prepare individual travel demand management plans for each development or new facility located at the airport.	Amend this policy to clarify and therefore ensure that this policy does not apply to development associated with Wellington International Airport.
S148.023	Chapter 3.1A: Climate change	Objective CC.7	Oppose in part	WIAL is concerned that this would promote development which would conflict with the effective and efficient operation of the airport, for example green spaces could attract birds which in turn for the airport present a significant safety hazard. It needs to be recognised that nature based solutions are not always practicable nor desirable in certain locations.	Amend the policy to add the following qualifier: ...where it is practicable and appropriate to do so [or provide an appropriate qualifier for regionally significant infrastructure] . Otherwise delete the Policy
S148.024	Chapter 4.1: Regulatory policies	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting -	Oppose	While WIAL understands the intent of this policy, it is noted that it may be too simplistic to apply this to the airport and aviation industry at this time. For example, in 2016 the Government agreed New Zealand would participate in the ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) 2. [Note 2 references - Ministry of Transport "CORSIA" at	Delete this policy or make it clear that it does not apply to Wellington International Airport and aviation industry

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		district and regional plans		<p>https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/</p> <p>CORSIA is a global market-based measure for reducing and offsetting carbon emissions in the international aviation sector 3.</p> <p>[Note 3 references - Ministry of Transport "CORSIA" at https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/]</p> <p>The scheme is to remain in place until 2035 and will operate as a global carbon market. Participation is only voluntary between 2021 and 2026. The second phase from 2027 onward will require mandatory participation of most ICAO member states. When the scheme becomes mandatory, airlines will be required to purchase carbon credits and finance abatement activities outside the aviation sector for emissions generated by international routes.</p> <p>In August 2019, the Government reconfirmed the decision to participate in CORSIA from 2021, and agreed to implement it through the Civil Aviation Bill 4.</p> <p>[Note 4 references - The Explanatory Note for the Civil Aviation Bill states that the framework is intended to enable New Zealand to meet its obligations under CORSIA.]</p> <p>The Bill is currently in its second reading stage before parliament. Among other matters, the Bill would see substantive policy changes to require certain airline operators offering international air services as a New Zealand airline to implement an emissions reporting and monitoring plan, and perform various emissions monitoring and reporting requirements 5.</p> <p>[Note 5 references - The monitoring and reporting requirements are provided under Part 6, Subpart 3 of the Civil Aviation Bill]</p> <p>In this situation mandatory carbon offsetting is expected to directly lead to a net reduction in emissions. It is therefore too simplistic for this policy to prioritise a reduction in emissions over offsetting.</p>	
S148.025	Chapter 4.2: Matters to	Policy CC.9: Reducing greenhouse	Oppose in part	As set out above it may take some time to develop the strategies that are necessary to address emissions in the airport	Amend this policy so that it is clear that it does not apply to the airport and aviation industry, or delete

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	be considered	gas emissions associated with transport infrastructure - consideration		and aviation sector. It would therefore be inappropriate if this policy were to extend to air transportation.	
S148.026	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Oppose in part	WIAL submits that the intention of this policy is somewhat unclear. The Airport is a major distributor of freight for the region and it is not clear how this policy would impact on its operations in this regard.	Amend this policy so that it is clear that it does not apply to the airport and aviation industry, or delete.
S148.027	Chapter 4.2: Matters to be considered	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose in part	As set out above technological changes and advances are evolving in the aviation sector to address emissions and it is difficult to prepare a "whole of life carbon emission assessment" which will be fixed at a certain point in time. The industry needs sufficient flexibility to adapt to new technology and respond to climate change. It would be inappropriate for this policy to require Wellington Airport and its operators to prepare a whole of life carbon emission assessment when technology and the industry is rapidly changing. In addition, this type of assessment is not appropriate for notices of requirements where long term development is contemplated and details of specific projects are not yet known.	Delete this policy or make it clear that it does not apply to Wellington International Airport and aviation industry.
S148.028	Chapter 4.2: Matters to be considered	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	Not sufficiently clear as to what a nature based solution to climate change involves. It would be inappropriate for this policy to unduly constrain regionally significant infrastructure and its associated development due to such uncertainty.	Delete this policy.
S148.029	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Concerned that the drafting of this policy would require all of these matters to be achieved when considering development within urban areas by the use of the "and" between "e" and "f". In some urban environments achieving all of these outcomes would be impractical, for example buildings within the airport could be used more efficiently to conserve water and energy	Delete this policy, or ensure that it does not apply to the Airport area.

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				usage, however it would be inappropriate for the airport to create green spaces, as these would present an aviation hazard and safety issue	
S148.030	Chapter 4.1: Regulatory policies	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support in part	Support the changes made to this policy, however it is not clear as to how such amendments fit within the general theme of this policy.	Accept the amendments.
S148.031	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Oppose in part	WIAL supports the policy in so far as it seeks to recognise the social, economic, cultural and environmental benefits of regionally significant infrastructure. However, the addition of "in particular low and zero carbon regionally significant infrastructure" is vague and it appears to elevate or potentially prioritise this type of infrastructure over all other types of regionally significant infrastructure. This would be inappropriate and as discussed above it is critically important that the RPS protects existing regionally significant infrastructure from the adverse effects of climate change and should include sufficient flexibility to adapt and respond to the challenges (and opportunities e.g. developing localised renewable energy generation facilities) climate change will present.	Delete reference in paragraph (a) to "in particular low and zero carbon regionally significant infrastructure" and in paragraph (a)(ii) at the end of this subparagraph to "including Wellington International Airport" in this policy .
S148.032	Chapter 4.1: Regulatory policies	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Support this policy on the basis that it is directed at land transportation requirements. WIAL also notes that it will take some time to transition to Sustainable Aviation Fuels. This was recognised in the Government's proposal to introduce a sustainable biofuels mandate. It is currently proposed that this mandate would not include sustainable aviation fuels. This is to be addressed separately as it is recognised that there are currently technological barriers in decarbonising the aviation industry. As such, there is more uncertainty as the policy direction the Government will take in the aviation sector across future emission budgets. It would be inappropriate for the RPS to be inconsistent with this national level policy.	Ensure that this policy retains its focus on land transportation.
S148.033	Chapter 4.1: Regulatory policies	Policy 11: Promoting and enabling energy efficient design and small scale renewable	Support	WIAL supports the policy in that it suitably seeks to enable the installation and use of smaller scale renewable energy generation facilities.	Retain this policy.

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		energy generation - district plans			
S148.034	Chapter 4.1: Regulatory policies	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support in part	WIAL supports initiatives to be contained within the Regional Land Transport Plan to assist in facilitating high quality active mode infrastructure and affordable public transport services with sufficient frequency. WIAL is however concerned that it may be unrealistic as an outcome within the RPS to expect that people will be able to live without the need to have access to a private vehicle. WIAL also submits that the current structure of the policy does not make grammatical sense and the last part should be deleted.	Delete the expectation that people will live without the need to access a private vehicle. Amend as follows: The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness., including between modes, for people to live in urban areas without the need to have access to a private vehicle, by contributing to reducing greenhouse emissions.
S148.035	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose in part	WIAL supports the policy in so far as it seeks to recognise the social, economic, cultural and environmental benefits of regionally significant infrastructure. However, the addition of "in particular low and zero carbon regionally significant infrastructure" is vague and it appears to elevate or prioritise this type of infrastructure over all other types of regionally significant infrastructure. This would be inappropriate and as discussed above it is critically important that the RPS protects existing regionally significant infrastructure from the adverse effects of climate change coupled with sufficient flexibility to adapt and respond to the challenges (and possibly opportunities e.g. developing localised renewable energy generation facilities) climate change will present.	Delete reference to "in particular low and zero carbon regionally significant infrastructure" in this policy.
S148.036	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose in part	WIAL is concerned that this policy has applied the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area. There are separate provisions relating to the management of the coastal environment and coastal marine area in the RPS. It is also confusing to have coastal policies in the Freshwater chapter and has the potential to cause interpretation problems in the future.	Delete reference to the coastal marine area in this policy and explanation. Ensure it only applies to freshwater and is consistent with the National Policy Statement for Freshwater Management 2020.
S148.037	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the	Oppose in part	WIAL is concerned that this policy has applied the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area. There are separate provisions relating	Delete reference to the coastal marine area in this policy. Ensure it only applies to freshwater and is consistent with the National Policy Statement for Freshwater Management 2020.

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		coastal marine area from urban development - consideration		to the management of the coastal environment and coastal marine area in the RPS.	
S148.038	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose in part	WIAL is concerned that this policy has applied the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area. There are separate provisions relating to the management of the coastal environment and coastal marine area in the RPS.	Delete reference to the coastal marine area in this policy and explanation. Ensure it only applies to freshwater and is consistent with the National Policy Statement for Freshwater Management 2020. Otherwise delete the policy.
S148.039	Chapter 3.6: Indigenous ecosystems	Objective 16	Oppose in part	WIAL acknowledges that this objective is generally consistent with section 6 requirements in the RMA relating to indigenous biodiversity outcomes. However when coupled with the ensuing policies and offsetting and compensation limitations, WIAL is concerned that this suite of provisions could significantly impact on infrastructure projects, including those which may be necessary to protect existing infrastructure assets such as maintenance of the seawall surrounding the airport. It may not always be able to enhance and restore existing ecosystems which may be affected by a development or project, however with appropriate offsetting or compensation overall ecosystem health could be improved and protected.	Amend the objective as follows: Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are protected, enhanced, and restored where appropriate and in accordance with an effects management hierarchy in order to achieve an overall healthy functioning state.
S148.040	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	WIAL is concerned that the broad framing of this significance criteria will likely mean significant areas of the region are identified as being a significant natural area. This criteria could potentially capture highly modified areas which cannot sensibly be identified as significant natural areas. WIAL also notes that the National Policy Statement for Indigenous Biodiversity is pending. It is likely that this will contain criteria that will be different to the RPS. It may therefore be appropriate to await the outcome of this policy document to ensure consistency.	Ensure this provision is consistent with national guidance, or alternatively ensure the criteria is appropriately targeted so that it does not inadvertently capture areas which do not sensibly comprise significant natural areas or delete the policy
S148.041	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats	Oppose	This policy is inappropriate in that it sets out limits and constraints as to when offsetting and compensation are available. These criteria are limiting and are written as a bottom line or hard limit. If they are not met the option of offsetting and/or compensation is no longer available to be used	Delete the proposed amendments to the policy including the limits associated with offsetting and compensation within this policy (a) - (d).

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		with significant indigenous biodiversity values - district and regional plans		<p>as part of any effects management response. These limits will likely foreclose offsetting and/or compensation even where it is likely to result in beneficial ecological or biodiversity outcomes in the region.</p> <p>The restrictions also depart from RMA section 104(1)(ab) which states that a consent authority "must" have regard to: "any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity".</p> <p>Furthermore, RMA section 104(1)(b)(iii) requires that a consent authority "must" have regard to any relevant provisions of a National Policy Statement. While not yet operative, the draft NPSIB provides some direction about when consideration of biodiversity offsetting should be precluded from consideration - being circumstances when:</p> <p>(i) Residual adverse effects cannot be offset because of the irreplaceability or vulnerability of the indigenous biodiversity affected.</p> <p>(ii) There are no technically feasible or socially acceptable options by which to secure gains within acceptable timeframes.</p> <p>(iii) Effects on indigenous biodiversity are uncertain, unknown or little understood, but potential effects are significantly adverse.</p> <p>This is far more balanced and likely to give rise to good environmental outcomes through offsetting, while avoiding the loss of very important or irreplaceable biodiversity.</p>	
S148.042	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	WIAL is concerned that there are inappropriate limits on offsetting and compensation in Policy 24 which is cross referred to in this policy. These reasons are set out above.	Delete subparagraph (i) including the reference to Policy 24 and the limits on offsetting and compensation.
S148.043	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Oppose	WIAL is concerned that the list of species in Table 17 is too broad. This coupled with the limits to offsetting and compensation that are set out in Appendix 1A and associated policies will mean that many projects which include beneficial ecological outcomes involving offsetting and/or compensation will not be able to be considered. For example, Table 17 sets out that "lake margins" meets or exceed	Delete both Appendix 1A and Table 17 in their entirety.

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				<p>Policy 24(b). The explanation set out in the Appendix 1A sets out that ecosystems and species that meet the criteria for Policy 24(b) exceed the limits of biodiversity compensation meaning that applications for compensation cannot be considered. This appears to be very broad for any activity which may affect a broadly defined "lake margin". Giant kelp which is present around the airport coastal area also triggers both Policy 24(a)(i) and NZCPS Policy 11(a) which when read against Appendix 1A appears that any activities which may impact on species would not be able to offer any offsetting or compensation and therefore proposals could not be considered.</p>	
S148.044	Chapter 3.8: Natural hazards	Objective 19	Support in part	WIAL supports the intent of this objective, however it is unclear what is meant by the term "minimise" This needs to be defined as per the Council's proposed Natural Resources Plan	Define minimise as per the Council's PNRP namely "Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning." Otherwise delete the amendment.
S148.045	Chapter 3.8: Natural hazards	Objective 20	Support in part	WIAL submits that it is unclear what is meant by the term "minimise" This needs to be defined as per the Council's proposed Natural Resources Plan	Define minimise as per the Council's PNRP namely "Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning." Otherwise delete the amendment.
S148.046	Chapter 3.8: Natural hazards	Objective 21	Support in part	WIAL supports ensuring that communities and the environment are made more resilient to and are better prepared for natural hazard events. This should be extended to also ensure regionally significant infrastructure is similarly managed	Amend the objective as follows: The resilience of our communities, regionally significant infrastructure, and...
S148.047	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose in part	Many infrastructure providers have a functional or operational requirement to locate in a certain area, even if that area is subject to natural hazard risk. Wellington Airport is located near the coast for example. Such infrastructure providers natural hazard tolerance is therefore inherently different to those without the same operational and functional need to locate in such areas.	Delete this policy or amend as follows: (d) include objectives, policies and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme, unless there is a functional operational need locate in such areas
S148.048	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural	Oppose in part	As above, WIAL submits that for certain activities, the risk to natural hazards is inherently different to those activities that do not have the same operational and functional need to locate in areas deemed to be high hazard locations. It would be	Delete this policy or amend to acknowledge that regionally significant infrastructure is not inappropriate development in certain high hazard locations.

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		hazards - consideration		inappropriate for this policy to constrain the development of the Airport for example on the basis of its proximity to the coast.	
S148.049	Chapter 4.2: Matters to be considered	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	<p>WIAL generally supports Policy 52(c) in that it recognises that structural protection works and/or hard engineering methods may be necessary to protect regionally significant infrastructure from hazard risk. This is relevant to the seawall which currently exists to protect existing infrastructure from the effects of coastal erosion and storm surges. It is noted however that the first preference in the RPS is to avoid such structures. With respect to the sea wall avoidance cannot practicably be the first preference in such a location. It is also not clear how such requirements as the "long term viability of maintaining the structural protection works" will be measured in the context of this policy.</p> <p>Does it mean that ongoing maintenance has to be avoided? Or does it require that the structure is able to withstand changes as a result of climate change and therefore should be maximised in terms of its engineering and construction.</p> <p>Reference is made to adverse effects on Te Mana o te Wai which is a concept of the NPS FW and not be applicable to the CMA and Te Rito o te Harakeke which as defined is overly broad.</p>	Delete this policy and explanation, or make it clear that in some situations hard engineering methods can be preferred in order to protect existing regionally significant infrastructure assets and limit reference to Te Mana o te Wai and Te Rito o te Harakeke
S148.050	Chapter 3.9: Regional form, design and function	Objective 22	Oppose in part	<p>WIAL seeks that the RPS appropriately recognises that in some situations housing developments can be appropriately constrained by the "qualifying matters" that are also set out in the National Policy Statement on Urban Development (NPS-UD) and recognised in sections 77I and 77O of the RMA.</p> <p>WIAL also considers that it would be appropriate for this objective to be clear in that it does not apply to regionally significant infrastructure, and rather it is referring to infrastructure (3 Waters, roading) which supports housing developments.</p>	Amend the objective as follows: Urban development, including housing and its associated infrastructure... (L) Protects regionally significant infrastructure and its ability to operate safely and effectively. [Note: end of amendments] Otherwise delete the objective
S148.051	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	WIAL submits that in considering urban development particular regard should also be had to whether it is compatible with and does not adversely affect or constrain the ability to operate existing regionally significant infrastructure.	Amend the policy to include (or with similar effect): avoids adverse reverse sensitivity effects on the operation and safety of regionally significant infrastructure.
S148.052	Chapter 4.2: Matters to be considered	Policy 57: Integrating land use and transportation	Support in part	WIAL generally supports the intent of this policy, however this should be directed at the district level (to influence zoning decisions for example) rather than requiring applicant for a resource consent (for example) to have to demonstrate consistency with all of the matters set out in (a) - (f).	This policy should be amended so that it is directed at a higher level rather than as a consideration for each and every resource consent application. Otherwise delete the amendments to the Policy.

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		- consideration			
S148.053	Chapter 4.2: Matters to be considered	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Oppose	WIAL submits that this policy sets an unduly onerous threshold in that it requires all new urban development to ensure it has all the infrastructure required to serve such development, including that low or zero carbon and public transportation infrastructure is available prior to the development occurring. While it is not clear if this policy would apply to a development within the Airport area, WIAL submits that it would be inappropriate to hold up such a project if for example, there are issues with the public transportation network, which is beyond its control.	Include a clear definition of urban development in the RPS. Delete this policy.
S148.054	Chapter 4.2: Matters to be considered	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Oppose in part	WIAL is concerned that there may be some practical limitations to the ability to implement this policy, and for this reason there is uncertainty around it. It also does not make grammatical sense as currently drafted.	Amend this policy and explanation to clarify how it will be implemented as follows: When considering an application for a resource consent, notice of requirement, or a plan change of a district plan for use or development, regard shall be had to whether there is any opportunity to support Māori in being able to express their culture and tradition through the proposal. This includes recognising taonga and sites and areas of significance, awa and moana and important places where mana whenua /tangata whenua still practice mātauranga.
S148.055	Chapter 4.2: Matters to be considered	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose in part	WIAL seeks that the RPS appropriately recognises that in some situations housing developments can be appropriately constrained by the "qualifying matters" that are also set out in the National Policy Statement on Urban Development (NPS-UD) and recognised in sections 771 and 77 of the RMA.	Amend the policy to include (or with similar effect): (a) (iv) avoids adverse reverse sensitivity effects on the operation and safety of regionally significant infrastructure.
S148.056	Appendix 3: Definitions	Regionally significant infrastructure	Support in part	WIAL supports the definition of Regionally Significant Infrastructure	Retain the definition and for clarity amend to include all associated supporting infrastructure for the Airport, such as its navigational infrastructure and the sea wall
S148.057	Appendix 3: Definitions	Maintain /maintained /maintenance : (in relation	Oppose in part	WIAL seeks to ensure that this definition is consistent with national direction that may be contained in the NPSIB. In its current drafting it also appears to achieve a level of protection, which is arguably higher than a requirement to "maintain".	Delete this definition

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		to indigenous biodiversity)			
S148.058	Appendix 3: Definitions	Protect (in relation to indigenous biodiversity)	Oppose in part	WIAL seeks to ensure that this definition is consistent with national direction that may be contained in the NPSIB.	Delete this definition.
S148.059	General comments	General comments - overall	Oppose in part	WIAL notes that not all of the provisions which have been earmarked for the freshwater planning process are directly related to the maintenance or enhancement of freshwater quality or quantity.	Ensure only those provisions which relate to the maintenance or enhancement of freshwater quality or quantity are subject to the fast-track freshwater planning process.

S113 Wellington Water

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S113 Wellington Water					
S113.001	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	General comments - Chapter 3	Support in part	Maintaining the functionality, integrity and adaptability of infrastructure, including regionally significant infrastructure, is essential in supporting communities' resilience against the effects of climate change. Infrastructure is also vulnerable to the effects of climate change. Enabling the upgrading, adaptation and relocation of regionally significant infrastructure will support community resilience.	Amend the list of issues to include: 4. The region's environment, communities and infrastructure are vulnerable to future national and global challenges associated with climate change. Climate change is expected to exacerbate flood hazard, including coastal inundation, and drought conditions. The effects of climate change, including coastal and river flood inundation and erosion, are expected to damage or impair the operation of infrastructure (including regionally significant infrastructure). Community resilience to the effects of climate change will depend on the functionality, integrity and adaptability of infrastructure. Regionally significant infrastructure will need to be upgraded and adapted or relocated to maintain the necessary functionality and capacity to support community resilience.

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S113.002	Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A	Support in part	<p>The notified version of Objective A:</p> <ul style="list-style-type: none"> • Fails to provide for the characteristics and qualities of well-functioning urban environments • Fails to provide for regionally significant infrastructure • Has some unclear drafting • Establishes Te Ao Māori as the pre-eminent concept for delivering integrated management with no guidance on how to achieve it. There are no supporting objectives, policies or methods about what integrated management guided by Te Ao Māori is. <p>In addition, clauses (a) to (f) emphasise the importance of, and need to protect, the natural environment. The RPS needs to do more than just 'recognise' the dependence of humans on the natural environment. The RPS needs to provide guidance for the development of natural resources where development is necessary to sustain communities and support community resilience.</p>	<p>Amend Objective A as follows: Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and:</p> <p>(a) is guided by Te Ao Māori and incorporates mātauranga Māori; and (b) recognises ki uta ki tai - the holistic nature and interconnectedness of all parts of the natural environment; and (c) protects and enhances mana whenua / tangata whenua values, in particular mahinga kai and the life supporting capacity of ecosystems; and (d) protects and enhances the life-supporting capacity of ecosystems; and (e) recognises the dependence of humans on a healthy natural environment (f) recognises the role of natural and physical resources in providing for the provides for and enhances the characteristics and qualities of well-functioning urban environments, which are supported by both natural and physical resources, including regionally significant infrastructure; and (g) enables use and development of natural and physical resources to support the infrastructure (including regionally significant infrastructure) necessary to strengthen the resilience of communities to meet the future challenges associated with climate change; and (h) responds effectively to the current and future pressures of climate change, population growth and development.</p> <p>OR amend Objective A as follows:</p>

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					<p>Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and by:</p> <p>(a) incorporates ing mātauranga Māori; and</p> <p>(b) recognises ing ki uta ki tai - the holistic nature and interconnectedness of all parts of the natural environment; and</p> <p>(c) protects ing and enhances ing mana whenua / tangata whenua values, in particular mahinga kai and the life supporting capacity of ecosystems; and (d) protects and enhancing the life-supporting capacity of ecosystems; and (e) recognises the dependence of humans on a healthy natural environment (f) recognises the role of natural and physical resources in provided for the provides ing for and enhances ing the characteristics and qualities of well-functioning urban environments, which are supported by both natural and physical resources, including regionally significant infrastructure; and (g) enabling use and development of natural and physical resources to support the infrastructure (including regionally significant infrastructure) necessary to strengthen the resilience of communities to meet the future challenges associated with climate change; and</p> <p>(h) responds ing effectively to the current and future pressures of climate change, population growth and development.</p>
S113.003	Chapter 3.1A:	Climate change	Support in part	The list of issues needs to include a 7th issue - water security. Solutions to severe water shortages can have lasting	Amend the list of regionally significant climate change issues to include new paragraph on page 10: 7 Climate change

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	Climate change	introductory text		environmental impacts, such as creation of dams. We would prefer other solutions and want to work constructively to achieve them.	<p>threatens our existing levels of water security. Water security is affected by climate change in two ways: 1. Increased potential and severity of drought reducing both ground and surface water supplies 2. Increased risk of saline intrusion into aquifers Water shortages can create public health crises and have long term impacts on economic viability of farms and businesses.</p> <p>Consequential changes throughout the document need to be included at objective, policy and method level, including in the climate change, natural hazard and Te Mana o te Wai provisions.</p>
S113.004	Chapter 3.1A: Climate change	Objective CC.4	Support in part	Nature based solutions aren't always practicable in Wellington's constrained urban environments.	Amend Objective CC.4 as follows: Objective CC.4 Where practicable , Nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment.
S113.005	Chapter 3.4: Fresh water (including public access)	Objective 12	Support in part	<p>WWL supports Rangitāne o Wairarapa and Kahungunu ki Wairarapa expressing how effect will be given to Te Mana o te Wai in their respective rohe; but does not support the proposal to include the entirety of their statements of expression within Objective 12.</p> <p>While parts of the statements resemble material suitable for objectives (both in content and in length), it is not clear how objectives within statements within objective 12 should be applied relative to objective 12 itself or other objectives</p>	<p>If it is necessary to keep the iwi statements intact, then they should not sit within Objective 12. They should be housed elsewhere within the RPS in a manner that makes clear how their variety of content types (objectives, policies, statements of issues and so on) are to be applied relative to other parts of the RPS.</p> <p>OR,</p> <p>If the statements do not need to be kept intact, then the objective-type material could be retained within objective 12,</p>

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				<p>elsewhere in the RPS. Further, the greater part of the statements contain material that is not suitable for objectives (either in content or in length), which more closely resembles other types of RPS content. This includes expressions of visions, issues, values, expectations, principles and so on. This far exceeds the requirements of 3.2(3) of the NPS-FM.</p> <p>It is not clear in the proposed drafting what the role is of policies that sit within statements that sit within an objective? How will applicants draft applications with confidence that they are giving effect to the RPS?</p>	and material of other types relocated like-with-like elsewhere within the RPS (i.e. placing policies with policies, explanations with explanations, issues with issues and so on).
S113.006	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Support in part	The provisions for indigenous biodiversity do not create appropriate planning pathways to allow for the benefits of regionally significant infrastructure. 'Protect' is a very strong term and we will struggle to achieve this in many locations. The provisions could lead to an increase in fatal flaws for our projects required to deliver Te Mana o te Wai and our services, so the provisions need to be nuanced to allow for the benefits of RSI.	<p>Provide the most appropriate pathways for delivering RSI and its benefits by either</p> <ul style="list-style-type: none"> • Deleting this component of the RPS change • Updating the RPS change to reflect the final gazetted version of the NPS-IB • Reflecting the provisions for specified infrastructure and associated benefits in the NPS-IB exposure draft in the RPS.
S113.007	Chapter 3.8: Natural hazards	Objective 20	Support in part	Support general intention but the word 'minimise' is too strong unless it is defined as per the pNRP	Include a definition of minimise as per the pNRP
S113.008	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Oppose	It is unclear how Te Mana o te Wai and three waters infrastructure interacts with the 'well-functioning urban environments'. This issue runs throughout this chapter.	Amend paragraph on page 76: Well-functioning urban environments enable communities and businesses to be more resilient to the effects of climate change, and the uptake of zero and low-carbon emission modes is supported throughout the region. Well-functioning urban environments have compact urban form and are well-designed and planned through the use of spatial and development strategies and use of design guidance. Well-functioning urban environments are low impact, support Te Mana o te Wai , incorporating water sensitive urban design, and managing the effects on other regionally significant values and features as identified in this RPS.
S113.009	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Oppose	<p>Given the upcoming investments that three waters infrastructure providers are considering in relation to both growth and water quality improvement, additional clarity would be helpful.</p> <p>The chapter also fails to recognise the importance of regionally significant infrastructure and its benefits.</p>	<p>Amend paragraph on page 79</p> <p>Medium and high-density development that is enabled through national direction has the potential to result in poor urban design outcomes, in the absence of sufficient design guidance.</p>

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					Effective regionally significant infrastructure is necessary for a well functioning urban environment.
S113.010	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Oppose	The chapter also fails to recognise the importance of regionally significant infrastructure and its benefits. Potential interactions include: Stormwater flooding Stormwater quality Wastewater contamination Efficient use of water.	Include an additional issues on page 80: AA Inadequate infrastructure There is a lack of supporting infrastructure to enable the development of sufficient housing and the provision of quality urban environments.
S113.011	Chapter 3.9: Regional form, design and function	Objective 22	Oppose	The clause restates the RPS and is superfluous	Delete clause (e) (e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and
S113.012	Chapter 4.1: Regulatory policies	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	Include a clause that District Plans will also enable infrastructure that gives effect to Te Mana o te Wai, or make suitable provision for this elsewhere in the RPS.	Amend the Policy as follows: By 30 June 2025, district plans shall include objectives, policies, rules and methods that enable infrastructure that: (a) supports the uptake of zero and low-carbon multi modal transport that contribute to reducing greenhouse gas emissions and/or(b) Gives effect to Te Mana o te Wai. OR Amend another policy or introduce a separate policy (whichever is the most appropriate), to achieve the same policy outcome as the amendment proposed above.
S113.013	Chapter 4.1: Regulatory policies	Policy CC.4: Climate resilient urban areas - district and	Support in part	The drafting is convoluted and should be simplified.	Amend the Policy as follows: District and regional plans shall include policies, rules and/or methods to provide for achieve climate-resilient urban areas by enabling and promoting/encouraging the providing for actions and initiatives described in Policy

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		regional plans			CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.
S113.014	Chapter 4.1: Regulatory policies	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Nature-based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment	Amend the Policy as follows: District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, where practicable.
S113.015	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	<p>The RPS needs to enable consideration of local and regional benefits, functional and operational need and adverse effects a case by case basis to determine what is appropriate in any particular circumstances.</p> <p>It will be very difficult for infrastructure providers to achieve Te Mana o te Wai, support growth, manage biodiversity, provide resilience for climate change and manage natural hazard risks if appropriate planning pathways are not provided in District and Regional Plans.</p> <p>The reference to low or zero carbon infrastructure in clause (a) creates a third tier of infrastructure to the detriment of regionally significant infrastructure.</p>	<p>Amend the Policy as follows: District and regional plans shall include objectives, policies and/or methods that recognise:</p> <p>(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular, low and zero carbon regionally significant infrastructure, including:</p> <p>...</p> <p>(iv) people have access to telecommunication services. including by providing appropriate planning pathways for delivering the benefits.</p> <p>....</p>
S113.016	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	This policy is reliant on the definition of hydrological controls, which is a very unclear definition. Clarity would be improved by adding the suggested wording to these this clause.	Add the following to subclause 14(j): Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;

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S113.017	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	This policy is reliant on the definition of hydrological controls, which is a very unclear definition. Clarity would be improved by adding the suggested wording to these this clause.	Add the following to subclause FW.3(m): Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;
S113.018	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	This policy is reliant on the definition of hydrological controls, which is a very unclear definition. Clarity would be improved by adding the suggested wording to these this clause.	Add the following to policy 42(k): Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;
S113.019	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	'Minimise' and 'maximise' are too strong, unless defined consistently with the pNRP	Include definitions for minimise and maximise consistent with the pNRP
S113.020	Chapter 3.4: Fresh water (including public access)	General comments - fresh water	Support in part	There is an overlap between GW and District and City Councils regarding the control of land use for water quality. This is critical for delivery of our upcoming stormwater consent application. Provisions addressing the overlap must be clear about the extent of mutual responsibilities, and avoid the risk of regional or territorial authorities individually taking less responsibility due to mutual obligations. This applies generally and particularly to Policy 14, Policy 15, Policy FW.3 Policy FW.6 and Policy 41.	Clarify district, city and regional councils' roles and functions regarding water quality, including the extent of mutual responsibilities.
S113.021	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological	Oppose	Clause (c) should be deleted because 3.22 and 3.24 of the NPS-FM set out a reasonably long list of specific exceptions to the policy direction - none of which is carried over into Policy 18.	Delete subclause(c) — there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their

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		health of water bodies - regional plans		This may confuse Regional Plans, as they must give effect to the NPS-FM and the RPS.	restoration is promoted;
S113.022	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	The intent of clauses (d) and (h) lacks clarity . Efficient allocation of water results in 100% of the water available for allocation being allocated, so a more suitable goal is appropriate, rather than efficient allocation. We agree water should be efficiently used.	Amend subclause (d) take limits for both allocation and minimum flows achieving environmental outcomes, target attribute states and environmental flows and levels with appropriate variability;
S113.023	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	The intent of clauses (d) and (h) lacks clarity . Efficient allocation of water results in 100% of the water available for allocation being allocated, so a more suitable goal is appropriate, rather than efficient allocation. We agree water should be efficiently used.	Amend subclause:(h) freshwater is appropriately allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided
S113.024	Chapter 4.1: Regulatory policies	Policy FW.1: Reducing water demand - regional plans	Support in part	Align the language with other GW documents and provide aligned definitions. Taumata Arowai uses the terms Small, Medium and Large Networked Supplies. Group Supplies as defined in the pNRP aligns with Small and Medium, while Community Supplies and Large Networked Supplies also align Extra wording to FW.1(d) for clarity.	Amend the policy: (d) provisions requiring water conservation measures, particularly in the summer months. Amend the Explanation: Policy FW.1 requires regional plans to address the reduction of demand in community or group municipal water supplies.
S113.025	Chapter 4.1: Regulatory policies	Policy FW.2: Reducing water demand - district plans	Support in part	Align the language with other GW documents and provide aligned definitions.	Amend the Explanation: Policy FW.2 requires regional plans to address the reduction of demand in community or group municipal water supplies.

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S113.026	Chapter 4.1: Regulatory policies	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Developments need to also consider the expectations of the stormwater management strategy and plan	Amend clause (h) as follows: (h) Consider the use and development of land in relation to target attribute states and any limits set in a regional plan and the outcomes sought in an approved stormwater management strategy or plan;
S113.027	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Not all activities can avoid high risk areas. For example, anywhere wet is considered high risk under the pNRP but many Wellington Water activities need to occur in wet locations.	Amend clause (d) as follows: (d) include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme or to appropriately manage the risk for regionally significant infrastructure.
S113.028	Chapter 4.2: Matters to be considered	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Simplify for clarity, and be clear that any water in urban areas that is not provided by Wellington Water should only be used for non- potable uses to ensure good public health outcomes. Also, it is unclear what 'community scale' means - if this involves creation of an additional network for vesting, Wellington Water may oppose the clause in its entirety.	Amend clause (c) as follows: (c) capturing, storing and recycling harvesting water at a community- scale for non-potable uses (for example by requiring rain tanks, and setting targets for urban roof area rainwater collection) OR Delete the clause in its entirety.
S113.029	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose	The addition in clause (a) creates a third tier of infrastructure to the detriment of regionally significant infrastructure and should be deleted.	Amend clause (a) as follows: (a) the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions; and

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S113.030	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Clauses (f) and (i) lack clarity.	Amend clause (f) (f) Minimising the effect of the proposals such as gravel extraction, exploratory drilling, flood protection and works in the beds of lakes and rivers on groundwater recharge areas that are connected to surface water bodies (i) Maintaining natural flushing flow regimes required to support aquatic ecosystem health
S113.032	General comments	General comments - overall	Not Stated / Neutral	Table 15 in Appendix 1 of the RPS and Schedule H of the pNRP are inconsistent.	Update Table 15 of RPS Appendix 1 (Rivers and lakes with significant amenity and recreational values) to align with Schedule H of the pNRP.
S113.033	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	The linking between the stem and subclauses of the policy need different wording	Amend links for grammatical consistency through the whole policy. For instance: (a) adopting an integrated approach...
S113.034	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	Minimise and maximise are only appropriate if defined in accordance with the pNRP (clause (l))	Retain "minimise" and "maximise" in clause (l) only if defined in accordance with the pNRP.
S113.035	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development	Oppose	Clause (r) should be redrafted as integrated management is a very broad term and a catchment approach is more appropriate in this context.	Amend subclause: (r) applying a catchment approach (ki uta ki tai) an integrated management approach to managing wastewater networks including partnering with mana whenua, as kaitiaki, and allowance for appropriately designed overflow points where necessary to support growth and consideration of different approaches to

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
		- consideration			wastewater management to resolve overflows.
S113.036	Chapter 4.2: Matters to be considered	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Not Stated / Neutral	Consideration of the matters in clauses (p) and (q) of Policy 42 should also apply to District Plans as they control the form of development and are more commonly used than regional plans. Then developers can be made aware of source water protection area risks earlier in their process, increasing the potential for a good outcome.	Insert new Policy 42A as follows: Policy 42A: Effects on freshwater from urban development - district plans District plans shall include policies and methods to:(a) Support and achieve efficient end use of reticulated water, and alternate water supplies for non-potable uses(b)Where appropriate, protect drinking water sources from inappropriate use and development by use of policies and overlays advising of the restrictions in the Regional Plans and recommending early engagement with GW. This is supported by a non-regulatory method that District and City council staff will advise of the drinking water protections in the regional plan via LIMs and PIMs, responses to public enquiries and preapplication meetings.
S113.037	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Clause (d) should reflect the variation in waterbody flow levels across the seasons. This will encourage water providers to take more water when it is readily available.	Amend clause (d) (d) Take limits (minimum flows and allocation limits) are achieved that provide for flow or level variability, safeguard ecosystem health, reflect annual and seasonal water cycles , provide for the life cycle needs of aquatic life, and take into account environmental outcomes
S113.038	Chapter 4.2: Matters to be considered	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Clause (h) should be altered for clarity and public health outcomes	Amend clause (d) (h) There is consideration of alternate water supplies (only non-potable in urban areas) such as storage or capture harvesting of rainwater for use during the drier summer months

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S113.039	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Clause (a) needs to reflect the potential for saline intrusion into the aquifer	(a) climate change impacts on water supply, including water availability and demand, including the potential for saline intrusion into the aquifer;
S113.040	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Clause (d) needs to reflect ki uta ki tai for protection of water sources	(d) protection of existing and future water sources identified in Source Water Risk Management Plans and including by via a catchment approach (ki uta ki tai).
S113.041	Chapter 4.2: Matters to be considered	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	A new clause should be added to support the importance of water demand management in achieving Te Mana o te Wai.	Insert new clause (e) The benefits from, and implications for, water demand management.
S113.042	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Clause (f) 'Minimise' is only appropriate if defined in accordance with the pNRP definition	Clause (f): Retain "minimising" only if defined in accordance with the pNRP.
S113.043	Chapter 4.2: Matters to be considered	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Add a new clause, as clause (g) doesn't recognise that some regionally significant infrastructure must locate in high hazard locations	Insert new clause: (k) recognising that it may not always be practicable for regionally significant infrastructure to avoid high to extreme hazard areas and providing appropriate management regimes
S113.044	Chapter 4.2: Matters to	Policy 58: Co-ordinating land use with	Support in part	Clause (b) should be amended to support public health outcomes	Amend clause (b) as follows: (b) all infrastructure required to serve new development,

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
	be considered	development and operation of infrastructure - consideration			including low or zero carbon, multi modal, and public transport infrastructure and Te Mana o te Wai infrastructure , is available, or is consented, designated or programmed to be available prior to development occurring.
S113.045	Chapter 4.4: Non-regulatory policies	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Clause (b) should be amended to support public health outcomes	Amend clause (b) as follows: (b) built solutions including storage at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds), while ensuring appropriate consideration of public health outcomes.
S113.046	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 34: Prepare a regional water supply strategy	Support in part	Wellington Water supports the concept of a regional water supply strategy, with changes. e.g. Taumata Arowai are also regulating in this space.	Amend Method 34 to: <ul style="list-style-type: none"> • Align with Taumata Arowai guidance. • Refer to 'use of water', rather than 'allocation', in clause (a). • Update the method to reflect the potential for water reform. • Address whether (and/or how) the strategy will still be relevant if water reform occurs. • Reflect public health concerns regarding alternate water supplies in urban areas. • Address water scarcity, operational resilience, growth and Te Mana o te Wai as part of clause (d). • Give effect to water safety plans and other requirements of Taumata Arowai as appropriate. • Apply ki uta ki tai to source protection.
S113.047	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 48: Water allocation policy review	Support in part	The method lacks clarity, appears to have clauses with similar intents and does not have an overarching purpose. e.g. Clause (c) and (d) are duplicates. Clauses (f) and (g) are duplicates. Clauses (i) and (j) are redundant.	Amend Method 48 to: <ul style="list-style-type: none"> • Clause (a) - refer to 'appropriate allocation' rather than 'efficient allocation'. • Delete either clause (c) or (d). • Clarify how transferable permits relate to improved water allocation. • Clarify what alternatives to 'first in, first served' will be considered. • Delete either clause (f) or (g). • Relate clause (h) to water allocation rather than climate change. • Delete clauses (i) and (j).

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S113.048	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Not Stated / Neutral	Increased urban development is required by the NPS- UD. This has implications for water quality which need to be addressed under the NPS-FM. The proposed method is a first step in reconciling the two NPS outcomes for wastewater.	Insert new Method 57: Method 57: Develop and implement a wastewater management strategy, in partnership with mana whenua/tangata whenua and in collaboration with territorial authorities and water infrastructure providers. The strategy shall: <ul style="list-style-type: none"> • Recognise the 100 year journey to improve water quality • Set out how to achieve Te Mana o te Wai when managing wastewater • Recognise that the journey may look different in different whaitua or for different mana whenua groups • Be informed by the WIPs and associated documents from mana whenua groups (eg Te Mahere Wai or iwi statements) • Create a framework of priorities and recognise that those priorities will change on the 100 year journey • Result in a planning framework that both implements the NPS- FM and provides appropriate levels of flexibility for this early stage of the 100 year journey
S113.049	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Not Stated / Neutral	Te Mana o te Wai is reliant on consistent application of the principles listed in the NPS-FM. The provision of water services in Wellington is subject to increasing regulation and additional regulators. As well as a public health and environmental regulator, an economic regulator is expected to be established by 2025. Wellington Water considers it would be beneficial for water services regulators to work together in an integrated manner.	Insert new Method 58 Method 58: Engage with Taumata Arowai and the water services economic regulator (when established) to ensure a consistent approach to Te Mana o te Wai, including consideration of limits, measures, targets and relationships, particularly where there are overlaps in functions and roles.
S113.050	Chapter 4.5: Methods to implement policies (non-regulatory methods)	General comments - non-regulatory methods	Not Stated / Neutral	Objective A represents a significant change from existing resource management practice. Rather than constantly referring to mana whenua for guidance on Te Ao Māori (and potentially creating further resourcing implications for mana whenua), the planning industry needs regular opportunities to upskill. As GW is driving this change in approach, GW should facilitate the upskilling.	Insert new method 59 Method 59: GW will run a regular series of workshops/training opportunities about how to deliver integrated management that is guided by Te Ao Māori in Wellington Region.
S113.051	Appendix 3: Definitions	Hydrological controls	Oppose	The purpose of the definition is unclear. The intent might be better served by creation of a policy, rather than a definition.	The following issues need to be addressed:

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				<p>The following issues need to be addressed:</p> <ul style="list-style-type: none"> • The definition refers to annual means rather than annual peaks • The practicability test for brownfield and infill developments may be better served with a more specific target • It is unclear whether the modelling is based on an undeveloped state or the surrounding catchment also being in an undeveloped state? This would affect water flowing onto the site and water attenuation • It is unclear what purpose the (a) clauses serve. The (b) clauses re to address stream scour that adversely impacts aquatic ecosystem health. If the (a) clauses are trying to achieve a different outcome to the (b) clauses, then this should be reflected in the policies. Currently the policies are only referring to one outcome, related to stream form. 	<ul style="list-style-type: none"> • Refer to annual means rather than annual peaks • Include a more specific target in the practicability test for brownfield and infill developments. • Clarify whether modelling is based on an undeveloped state or the surrounding catchment also being in an undeveloped state. • Clarify the purpose of clause (a) and how it is different to clause (b) <p>OR</p> <p>Create as a policy, rather than a definition.</p>
S113.052	Appendix 3: Definitions	Nature-based solutions	Oppose	The definition doesn't give effect to the NPS-FM and would benefit from the addition of an additional example.	<p>Amend the definition (with new bullet point added) to state:</p> <p>Actions to protect, enhance, or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce greenhouse gas emissions or give effect to Te Mana o te Wai and/or strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects of climate change.</p> <p>Examples include: Reducing greenhouse gas emissions (climate change mitigation):</p> <p>...• application of wastewater sludge to land rather than landfills</p>

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S113.053	Appendix 3: Definitions	Regionally significant infrastructure	Oppose	Fails to give effect to the NPS-FM	Amend the definition as follows: ... • the local authority wastewater and stormwater networks and systems, including treatment plants and , storage and discharge facilities and any infrastructure, assets or interventions to give effect to Te Mana o te Wai ...

S162 Winstone Aggregates

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S162 Winstone Aggregates					
S162.001	General comments	General comments - overall	Oppose in part	<p>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.</p> <p>Requests 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.</p> <p>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</p>	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. Seek to work further with GWRC to accurately and appropriately reflect the NRP policy direction in the RPS.

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				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.	
S162.002	General comments	General comments - overall	Oppose in part	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.	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.
S162.00	General comments	General comments - overall	Oppose in part	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).	Requests that: <ul style="list-style-type: none"> • 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).
S162.004	General comments	General comments - overall	Oppose in part	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. Very concerned with this approach and considers that it is an inappropriate use of the FPP process.	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.
S162.005	General comments	General comments - overall	Oppose in part	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.	Seeks that the RPS be amended to provide new objectives and methods that provide for these exceptions in the Draft NPS-IB.
S162.006	Chapter 3.1A: Climate change	Climate change introductory text	Oppose in part	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.	new subclause to reflect Objective O9 and O11 in NRP (f) recognises the benefits of protecting and utilising the regions significant mineral

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
					resources.
S162.007	Chapter 4.1: Regulatory policies	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<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. 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. 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>Amend the policy to more accurately reflect the requirements of the NPS-FM and NES-F:.</p> <p>(e) avoiding the loss of river extent and values is avoided where practicable;</p>
S162.008	Chapter 4.1: Regulatory policies	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<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. 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. 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. 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, high 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>Reject the proposed changes to this policy. 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>

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<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. 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 ecological connectivity, same can be said for the proposed new definitions of ecological integrity, ecological health, naturally uncommon ecosystems it is unclear how these interact or impact on how policy 23 will be interpreted.</p>	
S162.009	Chapter 4.1: Regulatory policies	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>There are significant issues with the proposed policy, including-</p> <ul style="list-style-type: none"> • 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 	Reject the proposed changes to this policy and delete any corresponding references to it.

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				<p>reasonable use of private land. Council has a duty to ensure that there is certainty as to when these limits are intended to apply.</p> <ul style="list-style-type: none"> • 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. <p>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" 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>	
S162.010	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose in part	<p>The benefits of recognising regionally significant mineral resources has been completely missed. Previously successfully campaigned during the mediation sessions for the NRP to have this explicitly recognised. (see PNRP Objective 011 and 09 etc.) 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>	Amend title: Policy 39: Recognising the benefits from renewable energy ,and regionally significant infrastructure and mineral resource utilisation - consideration
S162.011	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant	Oppose in part	<p>The benefits of recognising regionally significant mineral resources has been completely missed. Successfully campaigned during the mediation sessions for the NRP to have this explicitly recognised. (see PNRP Objective 011 and 09 etc.) This policy is a good fit for including significant mineral resources (as</p>	amend subclause. (b) protecting regionally significant infrastructure and significant mineral resources from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure or mineral resource; and

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		infrastructure - consideration		reflected in Policy P15 of the NRP) and will guide good decision making in future plans.	
S162.012	Chapter 4.2: Matters to be considered	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose in part	The benefits of recognising regionally significant mineral resources has been completely missed. Previously successfully campaigned during the mediation sessions for the NRP to have this explicitly recognised. (see PNRP Objective 011 and 09 etc.) 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.	amend subclause: (c) the need for renewable electricity generation facilities and quarrying activities to locate where the renewable energy resources exist; and
S162.013	Chapter 4.2: Matters to be considered	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	There is misalignment between this policy and Policy 18 which uses the terms protecting and restoring as opposed to protecting and enhancing. 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 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. 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. 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.	Align wording with Policy 18 or delete if it is repetitious. Amend wording to provide clear guidance on what constitutes significant indigenous ecosystems. This could be achieved by linking to the criteria in Policy 23. Amend the policy to accurately reflect the direction set in the NPS-FM 2020 and NPS-FM and any update. <i>[Note: Submission reference to prior submission points S162.007 and S162.008]</i>
S162.014	Chapter 4.2: Matters to be considered	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	Generally supports this policy and requests minor amendments for consistency between the heading and the policy text.	Amend. Policy 41: Controlling-Managing the effects of earthworks and vegetation disturbance
S162.015	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems	Support in part	Generally supports the changes to clause (g) of this policy. Request removal of (i) for the reasons described in Policy 24 summary. Queries whether there are changes to how this policy operates due to insertion of proposed new definitions.	Reject changes to clause (i) [Note: Submission reference prior submission point S162.009]

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		and habitats with significant indigenous biodiversity values - consideration			
S162.016	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	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.	new subclause under (a) 9. Protecting Regionally Significant Mineral/Aggregate Resources from inappropriate development.
S162.017	Chapter 4.4: Non-regulatory policies	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Generally supports for Policy 64 with minor amendments to the policy heading.	Retain as notified.
S162.018	Appendix 1A	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Oppose	<p>The introduction states that 'the setting of limits to the use of offsetting is one of the ten internationally accepted principles of biodiversity offsetting...'. The changes proposed via PPC1 incorrectly interpret this principle are at odds with RMA, case law and direction of the Draft NPSIB (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 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</p>	Delete Appendix 1A. <i>[Note: Submission reference to prior submission point 009, the rejection of changes to Policy 24]</i>

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				these circumstances despite the need to occur where the resource is based.	
S162.019	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	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.	New definition: 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.
S162.020	Appendix 3: Definitions	Biodiversity compensation	Oppose	<p>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.</p> <p>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>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>	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.
S162.021	Appendix 3: Definitions	Biodiversity offsetting	Oppose	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.	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.

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				<p>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>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>	
S162.022	Appendix 3: Definitions	Ecological connectivity	Oppose	<p>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.</p> <p>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>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>	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.
S162.023	Appendix 3: Definitions	Ecological integrity	Oppose	<p>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.</p>	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.

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				<p>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>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>	
S162.024	Appendix 3: Definitions	Ecosystem health	Oppose	<p>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.</p> <p>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>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>	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.
S162.025	Appendix 3: Definitions	Enhancement (in relation to indigenous biodiversity)	Oppose	<p>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.</p> <p>Concerned about seeking to adopt the draft NPS-IB definitions</p>	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.

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				<p>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>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>	
S162.026	Appendix 3: Definitions	Maintain /maintained /maintenance : (in relation to indigenous biodiversity)	Oppose	<p>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.</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>	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.
S162.027	Appendix 3: Definitions	Naturally uncommon ecosystems	Oppose	<p>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.</p> <p>Winstone is concerned about seeking to adopt the draft NPS-IB definitions in advance of these being settled. There is</p>	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.

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				<p>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>	
S162.028	Appendix 3: Definitions	Nature-based solutions	Oppose	<p>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.</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>	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.
S162.029	Appendix 3: Definitions	Organic waste	Oppose	<p>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.</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</p>	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.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<p>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>	
S162.030	Appendix 3: Definitions	Protect (in relation to indigenous biodiversity)	Oppose	<p>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.</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>	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.
S162.031	Appendix 3: Definitions	Resilience (in relation to a natural ecosystem)	Oppose	<p>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.</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</p>	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.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<p>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>	
S162.032	Appendix 3: Definitions	Restoration	Oppose	<p>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.</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>	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.
S162.033	Appendix 3: Definitions	Threatened ecosystems or species	Oppose	<p>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.</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</p>	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.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
				<p>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>	
S162.034	Appendix 3: Definitions	General comments - definitions	Not Stated / Neutral	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.	NPS-FM definitions and any updated definitions are added to the plan.
S162.035	Chapter 4.1: Regulatory policies	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Not Stated / Neutral	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. 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.	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
S162.036	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans - district plans	Not Stated / Neutral	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. Development/Construction activities seeking consent should be encouraged to source materials from local aggregate source in an effort to reduce their emissions.	Exclude quarrying activities from the requirement to provide travel demand management plans.
S162.037	Chapter 4.1: Regulatory policies	Policy 7: Recognising the benefits from renewable	Support in part	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.	Amend (a) The social, economic, cultural and environmental benefits of regionally significant infrastructure and significant mineral resources , and in particular low and zero

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		energy and regionally significant infrastructure - regional and district plans			carbon regionally significant infrastructure including (v) a secure supply of aggregate is available for development within the region
S162.039	Chapter 3.9: Regional form, design and function	Issue 2: Sporadic, uncontrolled and/or uncoordinated development	Oppose in part	<p>The issues statement in the Chapter Introduction has a single reference to aggregate, but it appears under the heading 'Sporadic, uncontrolled and/or uncoordinated development'</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>	<ul style="list-style-type: none"> Undertake mapping of Regionally Significant Aggregate Deposits to allow for their protection.
S162.040	Chapter 3.6: Indigenous ecosystems	General comments - indigenous ecosystems	Oppose in part	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.	Objective and Policy framework in this chapter be amended to allow offsetting taking into account "big picture" biodiversity gains.
S162.041	Chapter 3.9: Regional form, design and function	Regional form, design and function introductory text	Support in part	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 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.	Retain the text recognising that development in locations that restrict access to aggregate resource is a significant issue for the region. 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.
S162.042	Chapter 3.9: Regional form, design and function	Issue B: Inappropriate development	Support in part	Winstone also notes that the chapters lists issues of significance to the Wellington region's iwi authorities, and queries whether this should refer to local and iwi authorities.	Clarify if the listed issues are for iwi authorities only, or if they are also for local authorities.

Submission Point	Plan Section	Provision	Stance	Reasons	Decision Requested
S2 Zara Wills					
S2.001	General comments	General comments - overall	Oppose in part	Regional Council will be taking a step backwards to what the Kainga Ora / Government are wanting to achieve and do. Regional council should not restrict any existing identified greenfield development. Outside of these areas yes, but not existing identified greenfield or where there is a need for it.	Allow greenfield development where it has already been identified or where there is a need for it.
S2.002	General comments	General comments - overall	Oppose in part	As a resident of Wainuiomata North, I would like the Regional City Council to allow Wainuiomata North to be further developed. Wainuiomata North is the only greenfield area left that has been identified for development in the Lower Hutt area. This area is also included in the Regional growth framework. Properties have already been purchased by developers waiting for HCC to allow/rezone residential development. The regional council will be the reason for not allowing more housing when we have a housing crisis.	Exclude Wainuiomata North, and other greenfield areas identified in the Wellington Regional Growth Framework, from any new restrictions that would stop or make it very difficult to develop the area for residential housing.