Friday, October 14, 2022

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Attention: Hearings Adviser

Kia ora

PROPOSED CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION: SUBMISSION OF MERIDIAN ENERGY LIMITED

I attach the submission of Meridian Energy Limited (***Meridian***) on the Council's Proposed Change 1 to the Regional Policy Statement for the Wellington Region (**RPS-PC1**).

Meridian is a mixed ownership company in which the New Zealand Government retains a majority ownership. Meridian's core business is the generation, marketing, trading and retailing of electricity from renewable sources and the management of assets and ancillary structures for these purposes in New Zealand. Meridian established and operates the Brooklyn Wind Turbine and the West Wind and Mill Creek Wind Farms within Wellington City.

As a renewable electricity generator committed to New Zealand's carbon neutral future, Meridian supports the Council's initiative to promote policy changes to the Regional Policy Statement that give clear direction for emissions reduction in the earliest achievable time frame and address the challenges of climate change. The Regional Policy Statement has an important role to play, currently, as the key resource management planning instrument influencing the policy direction of regional and district plans.

While commending the policy emphasis of RPS-PC1 on reducing greenhouse gas emissions from land use activities and transport networks, Meridian observes that RPS-PC1 addresses only part of the issue. The reality is that achieving the transition from fossil fuels to reliance on renewable electricity and achieving resilience in local communities will require increased supply of renewable electricity and strengthened resilience in infrastructure networks nationwide, including within Wellington region.

The policy outcomes sought by RPS-PC1 will not, cannot, be achieved without enhanced renewable electricity generation capacity and strengthened resilience in infrastructure networks. These are critical to future community and economic resilience. In this respect, RPS-PC1 addresses only part of the challenge that lies ahead. RPS-PC1 needs to do more to actively facilitate additional renewable electricity generation capacity and strengthened infrastructure resilience, particularly for regionally significant infrastructure which involves significant assets and significant future locational decisions and funding commitments.

The lack of recognition of, and response to, these challenges in RPS-PC1 is a significant gap in the proposed provisions. The RPS needs to lead the way in facilitating outcomes for renewable electricity capacity and regionally significant infrastructure that can support the regional community's needs in the future. To that end, Meridian has requested amendments to the RPS-PC1 provisions to address this gap.

Meridian requests the relief specified in the attached submission, or such further or other relief as will address the issues raised in each submission point.

Meridian would welcome an opportunity to participate in pre-hearing meetings, including with other submitters, to explore amendments to address the requested decisions outlined in the attached submission.

Anticipating that there will be a short time period for consideration of further submissions, it would assist greatly if the Council could publish on its website as soon as practicable all submissions received – rather than waiting to publish those with the Schedule 1 summary of submission points.

Please don't hesitate to contact me if there are any matters that you or your Team wish to clarify or to discussion refinements to the proposed District Plan provisions that would address Meridian's requested relief.

Ngā mihi



Andrew Feierabend
Statutory and Compliance Strategy Manager

Meridian Energy Limited – Specific Submission Points Proposed Variation 1 -Regional Policy Statement Greater Wellington Regional Council

	RPS Ref. No.	Proposed Provision	Support or Oppose	Decision Requested:	Reasons:
	Chapter 3	**Resource Management Issues and Objectives**			
1.	**Chapter 3 Introduction** **Issues**	Overview of issues: The overarching resource management issues for the Wellington Region are: 1. …. 2. …. 3. ….	Support in part	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 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**	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. Enabling the upgrading, adaptation and relocation of regionally significant infrastructure will support community resilience.

				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.	
2.	**Chapter 3 Introduction** **Objectives**	The overarching resource management objective for the Wellington Region is: **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) recognises the role of both natural and physical resources in providing for the characteristics	Support in part	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	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

		and qualities of well-functioning *urban environments*; and (f) responds effectively to the current and future pressures of climate change, population growth and development.		**(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 of climate change, population growth and development.	clauses (a) to (c) and the reference to Te Ao Māori.
	Chapter 3.1A	Climate Change			
3.	**Chapter 3.1A Introduction** **Issues**	The regionally significant issues, and the issues of significance to the Wellington region's iwi authorities for climate change are: 1. Greenhouse gas *emission*s must be reduced significantly, immediately and rapidly Immediate, rapid, and large-scale reductions in greenhouse gas *emissions* are required to limit global warming to	Support in part	Insert into Chapter 3.1 issue 1 the following additional text (or words that have similar effect): The regionally significant issues, and the issues of significance to the Wellington region's iwi authorities for climate change are:	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

		1.5°C, the threshold to avoid significant impacts on the natural environment, the health and well-being of our communities, and our economy. Extreme weather events and sea level rise are already impacting our region, including on biodiversity, water quality and availability, and increasing the occurrence and severity of natural hazards. Historical *emissions* mean that we are already locked into continued warming until at least mid-century, but there is still an opportunity to avoid the worst impacts if global net anthropogenic CO_2 *emissions* are reduced by at least 50 percent from 2019 levels by 2030, and carbon neutrality is achieved by 2050. In the Wellington Region, the main sources of greenhouse gas *emissions* are transport (39 percent total load in 2018-19), agriculture (34 percent), and stationary energy (18 percent).		1. Greenhouse gas *emission*s must be reduced significantly, immediately and rapidly Immediate, rapid, and large-scale reductions in greenhouse gas *emissions* are required to limit global warming to 1.5°C, the threshold to avoid significant impacts on the natural environment, the health and well-being of our communities, and our economy. Extreme weather events and sea level rise are already impacting our region, including on biodiversity, water quality and availability, and increasing the occurrence and severity of natural hazards. Historical *emissions* mean that we are already locked into continued warming until at least mid-century, but there is still an opportunity to avoid the worst impacts if global net anthropogenic CO_2 *emissions* are reduced by at least 50 percent from 2019 levels by 2030, and carbon neutrality is achieved by 2050. In the Wellington Region, the main sources of greenhouse gas *emissions* are transport (39 percent total load in 2018-19), agriculture (34 percent), and stationary energy (18 percent). **Development of the renewable energy resources available in the region will be necessary to assist the transition**	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.

				from fossil fuel dependency and reduce greenhouse gas *emissions*.	
4.	**Table 1A Objective CC.1**	**Objective CC.1** FW 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.	Support in part	Insert explicit reference to 'regionally significant infrastructure' (a defined term in the operative RPs) into clause (c) of objective CC.1: **Objective CC.1** FW 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).**	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.
5.	**Table 1A Objective CC.3**	**Objective CC.3** 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:	Support in part	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: **Objective CC.3** 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	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 play in signalling the need for additional renewable electricity generation and in leading a RMA policy framework that enables

		(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 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*.		reduced **and additional renewable energy resources are developed to**: (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: (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 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* **by 2050**.	additional renewable electricity generation to make the transition. The baseline date in clause (a) differs from the dates in sub-clauses (i) to (iii) and this may be an error.
6.	**Table 1A** **Objective CC.6**	**Objective CC.6** 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.	Support in part	Insert into Objective CC.6 reference to infrastructure, including regionally significant infrastructure: **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.	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.

7.	**Table 1A Objective CC.7**	**Objective CC.7** People and businesses understand what climate change means for their future and are actively involved in planning and implementing appropriate *mitigation* and *adaptation* responses.	Support in part	Insert into Objective CC.7 the following text (or similar): **Objective CC.7** 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.	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.
	Chapter 3.3	**Energy, Infrastructure and Waste**			
8.	**Chapter 3.3 Introduction**	**Deletion of eighth paragraph of the chapter introduction:** ~~The New Zealand Energy Strategy (2007), the New Zealand Energy Efficiency and Conservation Strategy (2007) and the New Zealand Transport Strategy (2008) outline New Zealand's actions on energy and climate change. The objectives, policies and methods on energy in this Regional Policy Statement will assist with making progress towards national targets. There are, however, a number of targets – such as reducing carbon dioxide equivalent emissions from transport – where the Regional Policy Statement has limited influence.~~	Support	Confirm the proposed deletion	The text has been superseded by events and is out of date.
	Chapter 3.6	**Indigenous Ecosystems**			

9.	**Chapter 3.6 Introduction**	…. Human actions that continue to impact on the remaining indigenous ecosystems include: • 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 wetlands and channelling, constraining or piping of ~~natural waterways~~ rivers and streams • Contamination of coastal ecosystems by stormwater and sewage discharges 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, ~~T~~the *restoration* of ecosystems relies upon the good will and actions of landowners. There are a number of individuals, iwi, community groups and organisations throughout the region that are working to restore indigenous ecosystems. Public support for restoring indigenous ecosystems on public land and landowners retiring farmland has led to the regeneration of indigenous bush in rural	Support in part	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: …. Human actions that continue to impact on the remaining indigenous ecosystems include: • 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 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, ~~T~~the *restoration* of ecosystems relies upon the good will and actions of landowners. There	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 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.

		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 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, iwi and private land provides both public and private benefit. **….** The regionally significant issues and the issues of significance to the Wellington region's iwi authorities for indigenous ecosystems are: 1. The region's indigenous ecosystems are reduced in extent The region's indigenous ecosystems have been significantly reduced in extent and are being increasingly fragmented. Loss of area, ***ecological integrity*** and ***ecological connectivity*** reduce the **resilience** of ecosystems to respond to ongoing pressures, threatening their persistence and that of the indigenous biodiversity and **mahinga kai** they support. The indigenous ecosystems most reduced in extent are ~~specifically~~: (a) wetlands		are a number of individuals, iwi, community groups and organisations throughout the region that are working to restore indigenous ecosystems. Public support 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 and invertebrates around the city. 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 fauna**~~**native ecosystems and species**~~. The *restoration* of indigenous ecosystems on public, iwi and private land provides both public and private benefit. **….** The regionally significant issues and the issues of significance to the Wellington region's iwi authorities for indigenous ecosystems are: 2. The region's indigenous ecosystems are reduced in extent The region's indigenous ecosystems have been significantly reduced in extent and are being increasingly fragmented. Loss of area,	

		(b) lowland forests (c) lowland streams (d) coastal dune~~s~~lands and escarpments (e) estuaries (f) eastern 'dry land' forests.		***ecological integrity*** and ***ecological connectivity*** reduce the **resilience** of ecosystems to respond to ongoing pressures, threatening their persistence and that of the indigenous biodiversity and **mahinga kai** they support. The indigenous ecosystems most reduced in extent are ~~specifically:~~ (a) **natural** wetlands (b) lowland forests (c) lowland streams (d) coastal dune~~s~~lands and escarpments (e) estuaries (f) eastern 'dry land' forests.	
10.	**Table 6 (a) Objective 16**	**Objective 16** FW 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.	Oppose in part	Amend Objective 16 in the following (or similar) manner): **Objective 16** FW 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.	Enhancement and restoration will not be the only, or the appropriate, response in all situations.
11.	**Table 6 (a) Objective 16A**	**Objective 16A** FW The region's indigenous ecosystems are *maintained*, enhanced and restored to a		Amend Objective 16A as follows (or in a similar manner to achieve the same effect):	Objective 16 seeks to protect (and, where appropriate enhance and restore) *significant* indigenous ecosystems and

		healthy functioning state,-improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to *Te Rito o te Harakeke*.		**Objective 16A** FW 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*.~~	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.
	Chapter 3.9	**Regional Form, Design and Function**			
12.	**Chapter 3.9** **Table 9** **Objective 22**	**Objective 22** FW Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and	Support clause (f) of Objective 22	Retain Objective 22 as amended by RPS Change #1 and, in particular, proposed clause (f).	The transition to a low-emission economy is essential of New Zealand is to achieve its climate change goals.

		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.			
	Chapter 4.1	**Regulatory Policies**			
13.	**Chapter 4.1 Policy 3**	**Explanation:** ~~Although it is a matter of national importance to preserve the natural character of the coastal environment, the Resource Management Act does not preclude appropriate use and development in the coastal environment.~~ ….	Oppose	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): **Explanation:** ~~Although it is a matter of national importance to preserve the natural character of the coastal environment, the Resource Management Act does not preclude appropriate use and development in the coastal environment.~~ **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.**	This part of the operative explanation remains relevant. The protection required by the RMA is against *inappropriate* (not appropriate) use and development.
14.	**Chapter 4.1 Policy 7**	**Policy 7: Recognising the benefits from renewable energy and regionally**	Oppose in part	**Policy 7: Enabling the reduction in reliance on fossil fuels and ~~R~~recognising**	At a regional scale, the benefits of all infrastructure are relevant (not

		significant infrastructure – regional and district plans 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 low or zero carbon energy, so as to meet their needs; and (iv) people have access to telecommunication services. (b) the social, economic, cultural and environmental benefits of energy		**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~~: (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: (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; (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~~; (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	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. 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. As a consequence, the title of Policy 7 will need amendment to

		generated from renewable energy resources including: (i) security of supply and diversification of our energy sources; (ii) reducing dependency on imported energy resources; and (iii) reducing greenhouse gas emissions. **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.~~ ~~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 also~~		sewage and stormwater, and the provision of emergency services; (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 (v) ~~**people have**~~ access **by people and communities** to telecommunication services. (b) **recognise and enable** the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including: (i) **reduced dependence on fossil fuels and imported energy resources and the contribution to transitioning to a low emission economy;** (ii) **enhanced** security of supply and diversification of our energy sources; **and** (iii) ~~**reducing dependency on imported energy resources; and**~~ (iv) ~~**reducing**~~ **reduced** greenhouse gas emissions. **Explanation** ~~**Notwithstanding that renewable energy generation and regionally significant**~~	match the amended text of the policy. Text amendments are also necessary to rationalise the structure and grammar of the policy.

		~~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.~~ ~~Imported and non-renewable energy sources include oil, gas, natural gas and coal.~~ ~~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.~~ ~~Regionally significant infrastructure is defined in Appendix 3.~~		~~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. ~~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.~~ ~~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 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.~~ ~~Imported and non renewable energy sources include oil, gas, natural gas and coal.~~ ~~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.~~ ~~Regionally significant infrastructure is defined in Appendix 3.~~	

15.	**Chapter 4.1 Policy 11**	**Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation – district plans** District plans shall include policies and/or rules and other methods that: (a) promote energy efficient design and ~~the~~ energy efficient alterations to existing buildings; (b) enable the installation and use of domestic scale (up to 20 kW) and *small scale* distributed renewable energy generation (up to 100 kW)~~; and provide for energy efficient alterations to existing buildings;~~ **Explanation** Policy 11 promotes energy efficient design, energy efficient alterations to existing buildings, and enables installation of domestic scale and renewable energy generation (up to 100kW). Energy efficient design and alteration to existing buildings, can reduce total energy costs (i.e., heating) and reliance on non-renewable energy supply. *Small scale* distributed renewable electricity generation means renewable electricity generation for the purpose of using	Support	Retain Policy 11.	The RPS needs to enable all scales of renewable electricity generation, if the outcomes sought by RPS Change #1 are to be achieved.

		electricity on a particular site, or supplying an immediate community, or connecting into the distribution network. (from NPS-REG 2011). ~~Orientation, layout and design can have a significant influence on the energy efficiency of developments.~~ ~~Improved energy efficiency can be achieved by:~~ ~~1. Enabling everyday services such as shops, schools, businesses and community facilities to be accessed by walking and cycling~~ ~~2. Enabling easy access to public transport services~~ ~~3. Locating and designing infrastructure and services to support walking, cycling or the use public transport~~ ~~4. Enabling the efficient use of the sun as a source of power and heating~~ ~~5. Incorporating renewable energy generation facilities such as solar panels and domestic scale wind turbines~~ ~~Small scale distributed renewable energy generation facilities (up to 20 kW for domestic use and up to 100 kW for small community use)~~			

		~~include solar generation particularly for water heating and wind turbines used for on site or domestic purposes.~~ ~~Energy efficient alteration may include alterations of buildings for the installation of solar water heating systems or domestic scale wind turbines.~~			
16.	**Chapter 4.1** **Policy 24**	**Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans** FW By 30 June 2025, ~~D~~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. 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) 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	Oppose in part	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, ~~D~~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. 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)~~	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

		(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; (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; (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. **Explanation** Policy 24 applies to provisions in regional and district plans. The policy provides clarity about the limits to, and expected 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		~~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 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~~	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.

		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. Table 16 in Appendix 1 identifies rivers and lakes with significant indigenous ecosystems and habitats with significant indigenous biodiversity values by applying criteria taken from policy 23 of rarity (habitat for threatened indigenous fish species) and diversity (high macroinvertebrate community health, habitat for six or more migratory indigenous fish species). Policy 47 will need to be considered alongside policy 24 when changing, varying or reviewing a regional or district plan. Policy 24 is not intended to prevent change, but rather to ensure that change is carefully considered and is appropriate in relation to the biodiversity values identified in policy 23.		~~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.	

17.	**Chapter 4.2** **Policy IM.2**	**Policy IM.2: Equity and inclusiveness – consideration** When considering an application for a notified resource consent, 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 compounding historic grievances with iwi/Māori; and (b) not exacerbating existing 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 future generations. **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.	Oppose	Delete Policy IM.2 and the accompanying explanation.	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.
18.	**Chapter 4.2** **Policy 39**	**Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration**	Support in part	Amend Policy 39 and the accompanying explanation to support use and development of renewable energy to assist the transition	Many of the proposed amendments set out in proposed RPS Change #1 seek to hasten the transition from an economy

		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 (b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and (c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and (d) significant wind, solar and marine renewable energy resources within the region. **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		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 district or regional plan, particular regard shall be given to:** (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~~ these contributes ~~to~~ to reducing dependence on fossil fuels and potential greenhouse gas emissions; and** (b) **protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and** (c) **the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and**	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 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.

		contribute to reducing greenhouse gas emissions.		(d) **significant wind, solar and marine renewable energy resources within the region.** **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:** • **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 economcy** • **Reducing greenhouse gas emissions** **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 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.	
19.	**Chapter 4.2** **Policy 40**	**Policy 40: ~~Maintaining~~ Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems ~~aquatic ecosystem health in water bodies~~ – consideration** FW When considering an application for a regional resource consent, particular regard shall be given to: (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 well-being of waterbodies and the health and wellbeing of freshwater ecosystems ~~for the purpose of safeguarding aquatic ecosystem health~~; (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.~~:~~ ~~for the purpose of maintaining or enhancing aquatic ecosystem health; and~~ (c) ~~managing water bodies and the water quality of coastal water for~~	Support in part	Amend clause (h) as follows (or similar): When considering an application for a regional resource consent, particular regard shall be given to: (a) … (b) … (c) … (d) … (e) … (f) … (g) … (h) **protecting the values of rivers and lakes that 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; … … (m) ~~discouraging~~ restricting stock access to estuaries rivers, lakes and **natural** wetlands; and (n) ~~discouraging~~ avoiding the removal or destruction of indigenous wetland plants in **natural** wetlands.	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'.

		~~other purposes identified in regional plans.~~ (c) providing for mana whenua / tangata whenua values, including mahinga kai; (d) *maintaining* or enhancing the functioning of ecosystems in the water body; (e) *maintaining* or enhancing the ecological functions of riparian margins; (f) minimising the effect of the proposal on groundwater recharge areas that are connected to surface water bodies; (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; of rivers and lakes (h) significant indigenous ecosystems and habitats with significant indigenous biodiversity values of rivers and lakes, including those listed in Table 16 of Appendix 1; (i) *maintaining* natural flow regimes required to support aquatic *ecosystem health*; (j) *maintaining* or enhancing space for rivers to undertake their natural processes: (k) *maintaining* fish passage;			

		(l) protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning; (m) ~~discouraging~~ restricting stock access to estuaries rivers, lakes and wetlands; and (n) ~~discouraging~~ avoiding the removal or destruction of indigenous wetland plants in wetlands. **Explanation** Policy 40 provides criteria for considering regional consents to protect the health and wellbeing of waterbodies, particularly during the transition period before regional plans are changed to give effect to the NPS-FM. ~~Clause (a) identifies ecosystem health as a water management purpose for surface water bodies and clause (b) identifies water quality in the coastal marine area is to be managed for the purpose of aquatic ecosystem health. Other water management purposes for water bodies and coastal waters in clause (c) are to be established in regional plans as required by policies 5 and 12.~~ ~~Application for a resource consent refers to all types of resource consent. Policy 40 shall cease to be considered for resource consents processed by the Wellington Regional Council once policy 5 and 12 are~~			

		~~given effect to in a regional plan. Policy 40 shall continue to be considered by city and district councils when processing resource consents, notices of requirement and making changes, variations or reviews of district plans.~~ ~~District and city councils could implement this policy by requiring setback distances between buildings and rivers, wetlands and the coastal marine area to protect riparian areas, limiting the amount of impervious surfaces allowed in new developments in some catchments, requiring rooftop rainwater collection for gardens, requiring roadside swales, filter strips and 'rain gardens' for stormwater runoff instead of kerb and channelling, encouraging advanced community sewerage schemes rather than septic tanks in areas where groundwater is vulnerable, and encouraging the treatment of stormwater at source in car parks and industrial yards.~~			
20.	**Chapter 4.2** **Policy 41**	**Policy 41: Controlling ~~Minimising~~ the effects of earthworks and vegetation disturbance – consideration** 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 earthworks and vegetation disturbance by ~~to minimise~~: ~~(a) erosion; and~~	Oppose	Delete the following proposed amendments to Policy 41 and restore the operative wording as follows: **Policy 41: ~~Controlling~~ ~~Minimising~~ Minimising the effects of earthworks and vegetation disturbance – consideration** 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	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

		(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 (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 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 that erosion, siltation and sedimentation effects can not always be completely avoided. This policy provides for~~		given to controlling earthworks and vegetation disturbance **to minimise ~~by to minimise~~**: ~~(a) erosion; and~~ (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~~** **(c) ~~avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.~~** **~~Explanation~~ 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**	missing – i.e. the value of the suspended sediment standard.

		~~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.~~		**achievable whilst recognising that erosion, siltation and sedimentation effects can not always be completely avoided.** ~~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.~~	

21.	**Chapter 4.2** **Policy 47**	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values – consideration  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) *maintaining* connections within, or corridors between, habitats of indigenous flora and fauna and/or enhancing the connectivity between fragmented indigenous habitats; (b) providing adequate buffering around areas of significant indigenous ecosystems and habitats from other land uses; (c) managing 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) avoiding the cumulative adverse effects of the incremental loss of	Oppose in part	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) …	The focus of the RPS should be on 'natural' wetlands.

		indigenous ecosystems and habitats; (e) providing seasonal or core habitat for indigenous species; (f) *protecting* the life supporting capacity of indigenous ecosystems and habitats; (g) ~~remedying or mitigating~~ minimising or remedying adverse effects on the indigenous biodiversity values where avoiding adverse effects is not practicably achievable; ~~and~~ (h) the need for a precautionary approach when assessing the potential for adverse effects on indigenous ecosystems and habitats; (i) the limits to, and expected outcomes from *biodiversity offsetting* and *biodiversity compensation* set out in Policy 24.			
22.	**Chapter 4.4 Policy 65**	Policy 65: Supporting and encouraging Promoting efficient use and conservation of resources – non-regulatory FW To ~~promote~~ support and encourage conservation and efficient use of resources by:	Support in part	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 ~~promote~~ support and encourage conservation and efficient use of resources by:	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

		(a) applying the 5 Rs (Reduce~~ing~~, Reuse~~ing~~, Recycle~~ing~~, Recover, ~~recycling~~ 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) using water and energy efficiently; and (f) conserving water and energy. **Explanation** Policy 65 promotes the efficient use of resources to reduce *emissions*. The policy endorses the waste hierarchy and also promotes similar principles for efficient water and energy use. ~~For waste, using resources efficiently means following the waste hierarchy: reducing unnecessary use of resources, including reducing packaging; reusing unwanted goods that are still 'fit for purpose'; recycling new products from waste materials; and recovering resources (such as energy) from waste before disposing of the remaining waste safely. If resources are used efficiently, the amount of unwanted materials~~		(a) applying the 5 Rs (Reduce~~ing~~, Reuse~~ing~~, Recycle~~ing~~, Recover, ~~recycling~~ 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** 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.	for optimising the efficiency of use of renewable energy sources for electricity generation (which includes increasing generation capacity).

		~~disposed of at landfills and at sewage treatment plants will be reduced.~~ ~~Similar principles apply for reducing energy demand and conserving energy. This includes minimising the use of energy, reducing the need to use or being more efficient in use.~~ ~~Some of the ways to efficiently use or conserve water include reducing water demand and wastage by:~~ • ~~Setting targets for reducing leakage from reticulated water supplies within each district~~ • ~~Providing information to water suppliers and water users on how to conserve water and use it as efficiently as possible~~ • ~~Providing information about long term rainfall and drought predictions~~ • ~~Investigating the use of transferable water permits~~ ~~Leaks from water reticulation systems can waste over 15 per cent of treated water. Water supply authorities already have programmes for repair and maintenance, and it is vital that targets are set so that development of such programmes continues and water wastage is reduced.~~ ~~Water efficient household appliances and garden watering tied to garden needs, along~~			

		~~with fixing dripping taps and planting locally appropriate plants, are some of the ways that people could make the water delivered to their house go further. Greywater irrigation and recycling, and the use of rainwater tanks, are ways that households can make more efficient use of water.~~ ~~Weather predictions can help people prepare for possible weather extremes, for example by buying in stock feed or ensuring water reserves are at full capacity. Transferring water permits, or parts of water permits, allows allocated water to be used by as many people as the resource can sustain.~~			
23.	**Chapter 4.5.4 Method CC.10**	**Method CC.10:** Establish incentives to shift to active and public transport Establish, support and promote a range of incentives for uptake of zero and low-carbon multi modal transport to reduce greenhouse gas *emissions*, and to support an equitable and inclusive transition. *Implementation: Wellington Regional Council*	Support	Retain Method CC.10	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.
24.	**Chapter 5 Appendix 1A**	**Limits to biodiversity offsetting and biodiversity compensation**	Oppose in part	Delete Appendix 1A	The justification for inclusion of some of the items in proposed Appendix 1A is unclear.
25.	**Appendix 3 Definitions**	**Climate change mitigation**		Amend the definition of 'climate change mitigation' to include positive actions that	The focus of RPS Change #1 is on reduction of emissions but

		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. 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.		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.	that is only part of the solution. The complete solution will require a mix of reduction and replacement of energy sources.
26.	**Appendix 3 Definitions**	**Large scale generators** 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 excludes *domestic fires*.		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 excludes *domestic fires*.	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.
27.	**Appendix 3 Definitions**	**Maintain /maintained /maintenance** (in relation to indigenous biodiversity) At least no reduction in the following:	Oppose in part	Delete the reference to restoration and enhancement in the last paragraph: At least no reduction in the following:	Restoration and enhancement infer improvement, rather than maintenance. The need for and appropriateness of restoration or

		(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.		(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.~~	enhancement should be addressed in the relevant policies.
28.	**Appendix 3 Definitions**	**Regionally significant infrastructure**	Support	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'.	The definition is appropriate to support the proposed objectives, policies and methods.
29.	**Consequential Amendments**	**Tables 1A, 3, 4, 6 (a) and 9**		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.	Some amendments may be necessary where changes are made to the titles of policies and methods.