

| APPENDIX A | | | | | | |
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| PROVISION/ MATTER BEING APPEALED ¹ | SPECIFIC REASONS FOR APPEAL ² | RELIEF SOUGHT ³ | | | | |
| <p>Policy CC.2 Travel demand management plans – district plans</p> <p>By 30 June 2025, <i>district plans</i> shall include local thresholds for <i>travel choice assessments</i> as required by Policy CC.2. As a minimum, city and district councils must use the regional thresholds set out in Table 1 as the basis for developing their own local thresholds. The regional thresholds in Table 1 will cease to apply when Policy CC.2A is given effect through a <i>district plan</i>. To contribute to reducing <i>greenhouse gas emissions</i> city and district councils must develop their own travel choice thresholds that are locally specific.</p> <p>Table 1: Regional Thresholds</p> <table border="1"> <thead> <tr> <th>Activity and Threshold per application</th> </tr> </thead> <tbody> <tr> <td>100 residential units located within a <i>walkable catchment</i>.</td> </tr> <tr> <td>Commercial development of 2,500m² gross floor area</td> </tr> <tr> <td>Greenfield subdivision over 100 residential units</td> </tr> </tbody> </table> <p>Explanation</p> <p>The regional travel choice thresholds have been developed as a minimum and as guidance to assist city and district councils in developing their local travel choice thresholds. Local travel choice thresholds are important to reflect the differences in connectivity and accessibility between rural and <i>urban areas</i>. In addition, local travel choice thresholds should reflect local issues, challenges and opportunities. Local travel choice thresholds should apply to residential,</p> | Activity and Threshold per application | 100 residential units located within a <i>walkable catchment</i> . | Commercial development of 2,500m ² gross floor area | Greenfield subdivision over 100 residential units | <p>WIAL is actively involved in initiatives 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.</p> <p>Against this background, WIAL</p> | <p>Amend Policy CC.2 as follows:</p> <p>Include the following additional text at the end of the Explanation:</p> <p><u><i>For the avoidance of doubt, the commercial threshold does not apply to airport or airport related activities at Wellington International Airport.</i></u></p> |
| Activity and Threshold per application | | | | | | |
| 100 residential units located within a <i>walkable catchment</i> . | | | | | | |
| Commercial development of 2,500m ² gross floor area | | | | | | |
| Greenfield subdivision over 100 residential units | | | | | | |

¹ Decisions Version of RPS PC1

² In addition to general reasons

³ Subject to general relief and without limiting the scope of relief sought in WIAL’s original submission and further submissions

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| <p>education, office, industrial, community, entertainment and other land use activities that could generate private vehicle trips and freight travel. Development thresholds should specify the trigger level (for example, number of dwellings, number of people accommodated or gross floor area) where the requirement for a <i>travel choice assessment</i> applies. The results of <i>travel choice assessments</i> may form the basis for conditions of consent.</p> | <p>seeks that policy such as CC.2A would not inadvertently require the airport to prepare individual travel demand management plans for airport or airport related activities at Wellington International Airport.</p> | |
| <p>Objective 16</p> <p>Indigenous ecosystems and habitats with significant indigenous biodiversity values, other significant habitats of ingenuous fauna, and the ecosystem processes that support these ecosystems and habitats are protected and where appropriate, enhanced and restored to a healthy functioning state.</p> | <p>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</p> | <p>Amend Objective 16 as follows:</p> <p><i>Indigenous ecosystems and habitats with significant indigenous biodiversity values, other significant habitats of ingenuous fauna, and the ecosystem processes that support these ecosystems and habitats are <u>maintained, protected and where appropriate</u> enhanced and <u>or</u> restored <u>as appropriate and in accordance with an effects management hierarch in order to achieve an overall to a healthy functioning state.</u></i></p> <p>Or otherwise delete</p> |

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| | <p>existing infrastructure assets such as maintenance of the seawall surrounding the airport. It may not always be able to totally protect, 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.</p> | |
| <p>Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values and other significant habitats of indigenous fauna – district and regional plans</p> <p>As soon as reasonably practicable and by no later than 4 August 2028</p> <ol style="list-style-type: none"> 1. <i>District plans</i> shall identify and map <i>indigenous</i> ecosystems and <i>habitats</i> with significant <i>indigenous biodiversity</i> values and other significant <i>habitats</i> of <i>indigenous</i> fauna in the terrestrial environment that qualify as significant natural areas in accordance with Appendix 1B; and 2. <i>Regional plans</i> shall identify and map <i>indigenous</i> ecosystems and <i>habitats</i> with significant <i>indigenous biodiversity</i> values and other significant <i>habitats</i> of <i>indigenous</i> fauna in the <i>coastal marine area</i>, the | <p>The coastal marine area should not be categorised and treated in the same manner as freshwater bodies (lakes, rivers and wetlands) which are subject to their own specific National Policy Statement for Freshwater.</p> | <p>Amend Policy 23 as follows:</p> <p><i>Delete reference to the “coastal marine area” within Policy 23(2).</i></p> |

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| <p>beds of lakes and rivers, and natural wetlands, that meet one or more of the following criteria:</p> <p>....</p> | | |
| <p>Policy 24A: Principles for biodiversity offsetting and biodiversity compensation (except for REG and ET activities) – regional and district plans</p> <p>(a) Where district and regional plans provide for biodiversity offsetting or aquatic offsetting or biodiversity compensation or aquatic compensation as part of an effects management hierarchy for indigenous biodiversity and/or for aquatic values and extent, they shall include policies and methods to:</p> <p>(i) ensure this meets the requirements of the full suite of principles for biodiversity offsetting and/or aquatic offsetting set out in Appendix 1C or for biodiversity compensation aquatic offsetting and/or aquatic compensation set out in Appendix 1D;</p> <p>(ii) provide further direction on where biodiversity offsetting, aquatic offsetting, biodiversity compensation, and aquatic compensation are not inappropriate, in accordance with clauses (b) to (d) and (c) below;</p> <p>(iii) provide further direction on required outcomes from biodiversity offsetting, aquatic offsetting, biodiversity compensation, and aquatic compensation, in accordance with clauses (de) and (ef) below; and</p> <p>(b) In evaluating whether biodiversity offsetting or aquatic offsetting is inappropriate because of irreplaceability or vulnerability of the indigenous biodiversity, extent, or values affected, the feasibility to offset residual adverse effects on any threatened or naturally uncommon ecosystem or threatened species must be considered, including those listed in Appendix 1A as a minimum; and</p> | <p>Policy 24A is part of a complex suite of interconnected policy provisions including Appendices 1A – C and Table 17. 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.</p> <p>Policy 24CC is intended to provide a</p> | <p>Amend Policy 24A as follows:</p> <p>Firstly, amend the heading:</p> <p><i>Policy 24A: Principles for biodiversity offsetting and biodiversity compensation (except for REG and ET activities or existing regionally significant infrastructure under Policy 24CC) – regional and district plans</i></p> <p>(a)</p> <p>Secondly, amend the Explanation:</p> <p><i>Explanation</i> <i>[insert at end of last paragraph]</i></p> <p><i>Policy 24A does not apply to existing regionally significant infrastructure activities which are subject to 24CC.</i></p> <p>Otherwise, amend Policies 24, 24A, 24B, 24C, and 24CC to simplify the provisions and provide an appropriate consenting pathway for</p> |

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| <p>(c) In evaluating whether biodiversity compensation or aquatic compensation is inappropriate because of the irreplaceability or vulnerability of the indigenous biodiversity, extent, or values affected, recognise that it is inappropriate to use biodiversity compensation or aquatic compensation where residual adverse effects affect a threatened or naturally uncommon ecosystem or threatened species, including those listed in Appendix 1A as a minimum; and</p> <p>(d) In evaluating whether biodiversity offsetting or aquatic offsetting is inappropriate because there are no technically feasible methods to secure gains in acceptable timeframes, recognise that this is likely to be inappropriate for those species and ecosystems listed in column Policy 24A(d) in Appendix 1A but that may change over time due to changes in knowledge, methods or expertise, or mechanisms; and</p> <p>(e) District and regional plans shall include policies and methods that require biodiversity offsetting or aquatic offsetting to achieve at least a net gain, and preferably a 10% net gain or greater, in indigenous biodiversity outcomes to address residual adverse effects on indigenous biodiversity, extent, or values. This requires demonstrating, and then achieving, net gains in the type, amount, and condition of the indigenous biodiversity, extent, or values impacted. Calculating net gain requires a like-for-like quantitative loss/ gain calculation of the indigenous biodiversity values (type, amount, and condition) affected by the proposed activity; and</p> <p>(f) District and regional plans shall include policies and methods to require biodiversity compensation or aquatic compensation to achieve positive effects in indigenous biodiversity, extent, or values that outweigh residual adverse effects on affected indigenous biodiversity, extent, or values.</p> <p>Explanation Policy 24A recognises that the outcomes achievable through the use of biodiversity or aquatic offsetting and compensation are different. A ‘net gain’</p> | <p>potential consenting pathway for the continued operation, maintenance, upgrade and extension of <u>existing</u> regionally significant infrastructure. However the various qualifiers within Policy 24A and Policy 24C give rise to circular interpretation and appear to preclude such a consenting pathway in certain circumstances. WIAL therefore considers that further clarification is required to ensure that it is clear that:</p> <ul style="list-style-type: none"> - Policy 24CC applies to <u>existing infrastructure</u>. - Offsetting and compensation are both viable management | <p>the operation, maintenance, upgrade and extension of existing RSI where adverse effects referred to in Policy 24C (1) and (2) may arise.</p> |
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| <p>outcome from offsetting is expected to achieve an objectively verifiable increase in the target values, while a compensation outcome is more subjective and less preferable. This policy applies to the use of biodiversity offsetting and biodiversity compensation to address the residual adverse effects on indigenous biodiversity in the terrestrial and coastal environments and aquatic offsetting and aquatic compensation to address the loss of extent or values of natural inland wetlands and rivers.</p> <p>Policy 24A is to be read with Policy 24C(1) which sets out adverse effects on indigenous biodiversity in the coastal environment that need to be avoided, meaning that applications for biodiversity offsetting or biodiversity compensation cannot be considered. These ecosystems and species are also listed in Table 17 and Appendix 1A. Policy 24A does not apply to REG activities and ET activities which are subject to 24D. Instead, Policy 24D(3) requires REG activities and ET activities to have regard to the principles for biodiversity offsetting and biodiversity compensation.</p> | <p>responses for existing infrastructure maintenance, operation, upgrade and extension.</p> | |
| <p>Amend Policy 24C as follows:</p> <p>Policy 24C: Managing adverse effects on <i>indigenous biodiversity</i> values in the coastal environment – district and regional plans</p> <p>As soon as reasonably practicable, and by no later than 4 August 2028, district and <i>regional plans</i> shall include policies, rules and methods to manage adverse effects on <i>indigenous biodiversity</i> values in the <i>coastal environment</i> to:</p> <p>(1) Avoid adverse effects of activities on the following ecosystems, <i>habitats</i> and species with significant <i>indigenous biodiversity</i> values:</p> <p>(a) <i>indigenous taxa</i> that are listed as <i>Threatened</i> or <i>At-Risk species</i> in the New Zealand Threat Classification System lists;</p> <p>(b) <i>taxa</i> that are listed by the International Union for Conservation of Nature and Natural Resources as threatened;</p> | <p>Refer above</p> | <p>Amend the explanation to Policy 24C as follows:</p> <p>Explanation:</p> <p><i>Policy 24C is to be read together with:</i></p> <ul style="list-style-type: none"> • <i>Policy 24A which sets out principles for biodiversity offsetting and biodiversity compensation which apply in the coastal environment.</i> • <i>Policy 24B in relation to the coastal environment above mean high water springs, with Policy 24C to prevail where</i> |

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| <p>(c) <i>threatened indigenous ecosystems</i> and vegetation types that are threatened in the <i>coastal environment</i>, or are <i>naturally rare</i>;</p> <p>(d) <i>habitats of indigenous species</i> where the species are at the limit of their natural range, or are <i>naturally rare</i>;</p> <p>(e) areas containing nationally significant examples of <i>indigenous</i> community types; and</p> <p>(f) areas set aside for full or partial protection of <i>indigenous</i> biological diversity under other legislation; and</p> <p>(2) Avoid significant adverse effects on the following <i>indigenous</i> ecosystems and <i>habitats</i>:</p> <p>(a) areas of predominantly <i>indigenous</i> vegetation in the <i>coastal environment</i>;</p> <p>(b) <i>habitats</i> in the <i>coastal environment</i> that are important during the vulnerable life stages of <i>indigenous</i> species;</p> <p>(c) <i>indigenous</i> ecosystems and <i>habitats</i> that are only found in the <i>coastal environment</i> and are particularly vulnerable to modification, including estuaries, lagoons, coastal <i>wetlands</i>, dunelands, <i>intertidal zones</i>, rocky reef systems, eelgrass and saltmarsh;</p> <p>(d) <i>habitats of indigenous species</i> in the <i>coastal environment</i> that are important for recreational, commercial, traditional or cultural purposes;</p> <p>(e) <i>habitats</i>, including areas and routes, important to migratory species; and</p> | | <p>there is conflict that cannot be resolved.</p> <ul style="list-style-type: none"> ● Policy 24CC which relates to existing regionally significant infrastructure and REG activities in the coastal environment. ● Policy 24D which applies to REG activities in terrestrial, freshwater and coastal environments. <p>Otherwise amend Policies 24, 24A, 24B, 24C, and 24CC to simplify the provisions and provide an appropriate consenting pathway for the operation, maintenance, upgrade and extension of existing RSI where adverse effects referred to in Policy 24C (1) and (2) may arise.</p> |
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| <p>(f) ecological corridors, and areas important for linking or maintaining biological values.</p> <p>(3) Manage non-significant adverse effects on the <i>indigenous</i> ecosystems and <i>habitats</i> referred to in clause (2) by:</p> <p>(a) avoiding adverse effects where practicable; then</p> <p>(b) where adverse effects cannot be avoided, minimising them where practicable; then</p> <p>(c) where adverse effects cannot be minimised they are remedied where practicable; then</p> <p>(d) where residual adverse effects cannot be avoided, minimised, or remedied, <i>biodiversity offsetting</i> is provided where possible; then</p> <p>(e) if <i>biodiversity offsetting</i> of residual adverse effects is not possible, the activity itself is avoided unless the activity is <i>regionally significant infrastructure</i> then <i>biodiversity compensation</i> is provided, and</p> <p>(f) the activity itself is avoided if <i>biodiversity compensation</i> cannot be undertaken in a way that is appropriate as set out in Appendix 1D.</p> <p>(4) for all other ecosystems and <i>habitats</i> not listed in clause (1) and (2), manage significant adverse effects on <i>indigenous biodiversity</i> values using the <i>effects management hierarchy</i>.</p> <p>Explanation: This policy applies to provisions in district and <i>regional plans</i>. This requires district and <i>regional plans</i> to manage adverse effects on <i>indigenous biodiversity</i></p> | | |
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| <p>in the <i>coastal environment</i> by applying a hierarchy approach based on the values of the <i>indigenous</i> species, ecosystem or <i>habitat</i>. Policy 24C is to be read together with:</p> <ul style="list-style-type: none"> • Policy 24A which sets out principles for <i>biodiversity offsetting</i> and <i>biodiversity compensation</i> which apply in the <i>coastal environment</i>. • Policy 24B in relation to the <i>coastal environment</i> above mean high water springs, with Policy 24C to prevail where there is conflict that cannot be resolved. • Policy 24CC which relates to existing <i>regionally significant infrastructure</i> and <i>REG activities</i> in the <i>coastal environment</i>. <p>Policy 24D which applies to <i>REG activities</i> in terrestrial, <i>freshwater</i> and <i>coastal environments</i>.</p> | | |
| <p>Policy 24CC as follows: Policy 24CC: Existing <i>regionally significant infrastructure</i> and <i>REG activities</i> in the <i>coastal environment</i> - regional and district plans</p> <p>As soon as reasonably practicable, and by no later than 4 August 2028, district and <i>regional plans</i> shall include policies, rules and methods to consider providing for the operation, maintenance, upgrade and extension of existing <i>regionally significant infrastructure</i> and <i>REG activities</i> that may have any of the adverse effects referred to in clause (1) and (2) of Policy 24C where:</p> <ol style="list-style-type: none"> (1) There is a <i>functional need</i> or operational need for the <i>regionally significant infrastructure</i> or <i>REG activities</i> to be in the area; and (2) There is no practicable alternative on <i>land</i> or elsewhere in the <i>coastal environment</i> for the activity to be located; and (3) The activity provides for the <i>maintenance</i> and, where practicable, the <i>enhancement</i> or <i>restoration</i> of the affected significant <i>indigenous</i> | Refer above. | <p>Amend the explanation to Policy 24CC as follows:</p> <p>Explanation:</p> <p><i>Policy 24CC is to be read with Policy 24 and is intended to enable the consideration of the operation, maintenance, upgrade and extension of existing regionally significant infrastructure and existing REG activities with adverse effects that would otherwise need to be avoided under clause (1) and (2) of Policy 24C. It only allows for consideration of these adverse effects when certain requirements are met, including</i></p> |

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| <p><i>biodiversity</i> values and attributes at, and in proximity to, the affected area, taking into account any consultation with the Wellington Regional Council, the Department of Conservation and mana whenua.</p> <p>If the activity provides for the reasonable operational, maintenance or minor upgrade requirements of the electricity transmission network, (1) to (3) do not apply and the activity must be enabled.</p> <p>Explanation:</p> <p>Policy 24CC is to be read with Policy 24 and is intended to enable the consideration of the operation, maintenance, upgrade and extension of existing <i>regionally significant infrastructure</i> and existing <i>REG activities</i> with adverse effects that would otherwise need to be avoided under clause (1) and (2) of Policy 24. It only allows for consideration of these adverse effects when certain requirements are met, including demonstrating that there are no practicable alternative locations for the activity and the activity provides for <i>maintenance, enhancement or restoration</i> of significant <i>indigenous biodiversity</i> values at the area affected.</p> | | <p><i>demonstrating that there are no practicable alternative locations for the activity and the activity provides for maintenance, enhancement or restoration of significant indigenous biodiversity values at the area affected.</i></p> <p><i>For the avoidance of doubt, policies, rules and methods that consider providing for the operation, maintenance, upgrade and extension of existing regionally significant infrastructure and REG activities may include consideration of biodiversity offsetting and biodiversity compensation.</i></p> <p>Otherwise amend Policies 24, 24A, 24B, 24C, and 24CC to simplify the provisions and provide an appropriate consenting pathway for the operation, maintenance, upgrade and extension of existing RSI where adverse effects referred to in Policy 24C (1) and (2) may arise.</p> |
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| <p>Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values and other significant habitats of indigenous fauna – consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a <i>district</i> or <i>regional plan</i>, a determination shall be made as to whether an activity may affect <i>indigenous</i> ecosystems and <i>habitats</i> with significant <i>indigenous biodiversity</i> values, other significant <i>habitats</i> of <i>indigenous</i> fauna, and the <i>ecosystem processes</i> that support these ecosystems and habitats, and in determining whether the proposed activity is inappropriate particular regard shall be given to:</p> <p>(a) <i>maintaining</i> connections within, or corridors between, <i>habitats</i> of indigenous flora and fauna and/or enhancing the connectivity between fragmented indigenous habitats; and</p> <p>(b) providing adequate <i>buffering</i> around areas of significant indigenous ecosystems and habitats from other land uses; and</p> <p>(c) managing natural wetlands for the purpose of aquatic <i>ecosystem</i> health, recognising the wider benefits, such as for <i>indigenous biodiversity</i>, water quality and holding water in the landscape; and</p> <p>(d) avoiding the cumulative adverse effects of the incremental loss of <i>indigenous</i> ecosystems and <i>habitats</i>; and</p> <p>(e) providing seasonal or core habitat for <i>indigenous</i> species; and</p> <p>(f) <i>protecting</i> the life supporting capacity of <i>indigenous</i> ecosystems and <i>habitats</i>; and</p> <p>(g) minimising or remedying adverse effects on the <i>indigenous biodiversity</i> values where avoiding adverse effects is not practicably achievable except where Clause (i) and (j) apply; and</p> | Refer above | <p>Amend Policy 47 as follows:</p> <p>Firstly, amend clause (i):</p> <p>(i) the provisions to protect significant biodiversity values in Policy 24B, and Policy 24C and the principles for biodiversity offsetting and biodiversity compensation in Policy 24A, except that:</p> <p><u>(i) Policy 24A and Policy 24B do not apply to REG activities and ET activities; and</u></p> <p><u>(ii) Policy 24A and Policy 24C do not apply to existing RSI activities under Policy 24CC.</u></p> <p>Secondly, amend the Explanation:</p> <p><i>.... The clauses above that relate to Policy 24A, Policy 24B and established activities do not apply to REG activities or ET activities. <u>Policies 24A and 24C do not apply to existing RSI activities under Policy 24CC.</u></i></p> |
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| <p>(h) the need for a precautionary approach to be adopted when assessing and managing the potential for adverse effects on <i>indigenous</i> ecosystems and <i>habitats</i>, where;</p> <p style="padding-left: 40px;">(i) the effects on <i>indigenous biodiversity</i> are uncertain, unknown, or little understood; and</p> <p style="padding-left: 40px;">(ii) those effects could cause significant or irreversible damage to <i>indigenous biodiversity</i>; and</p> <p>(i) the provisions to protect significant biodiversity values in Policy 24B, and Policy 24C and the principles for <i>biodiversity offsetting</i> and <i>biodiversity compensation</i> in Policy 24A, except that Policy 24A and Policy 24B do not apply to <i>REG activities</i> and <i>ET activities</i>; and</p> <p>(j) the provisions to manage the adverse effects of <i>REG activities</i> and <i>ET activities</i> on significant biodiversity values in Policy 24D; and</p> <p>(k) protecting <i>indigenous biodiversity</i> values of significance to <i>mana whenua / tangata whenua</i>, including those associated with a significant site for <i>mana whenua / tangata whenua</i> identified in a <i>regional</i> or <i>district plan</i>; and</p> <p>(l) enabling <i>established activities</i> affecting significant biodiversity values in the terrestrial environment to continue, where the effects of the activities:</p> <p style="padding-left: 40px;">(i) are no greater in intensity, scale and character; and</p> | | |
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| <p>(ii) do not result in loss of extent, or degradation of <i>ecological integrity</i>, of any significant biodiversity values; and</p> <p>(m) ensuring that the adverse effects of <i>plantation forestry</i> activities on significant <i>indigenous biodiversity</i> values in the terrestrial environment are managed in a way that:</p> <p>(i) maintains significant <i>indigenous biodiversity</i> values as far as practicable, while enabling <i>plantation forestry</i> activities to continue; and</p> <p>(ii) where significant biodiversity values are within an existing <i>plantation forest</i>, maintains the long-term populations of any <i>Threatened</i> or <i>At Risk (declining)</i> species present in the area over the course of consecutive rotations of production.</p> <p>Explanation Policy 47 makes it clear that the provisions in Policy 24 and Policy 24A to protect significant <i>indigenous biodiversity</i> values must be considered until those policies are given effect to in regional and <i>district plans</i>. Policy 47 also provides for <i>established activities</i> and <i>plantation forestry</i> activities affecting significant <i>indigenous biodiversity</i> values to continue, provided certain tests are met, consistent with the requirements in the National Policy Statement for Indigenous Biodiversity 2023. The clauses above that relate to Policy 24A, Policy 24B and <i>established activities</i> do not apply to <i>REG activities</i> or <i>ET activities</i>.</p> | | |
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| <p>In determining whether an activity may affect significant <i>indigenous biodiversity</i> values, the criteria in Policy 23 should be used.</p> | | |
| <p>Appendix 1A, including Table 17</p> | <p>WIAL considers 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. 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.</p> | <p>Delete Appendix 1A, including Table 17.</p> |

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| | <p>Policy 24A 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> <p>WIAL also considers that it is not appropriate for the species set out in Table 17 to be updated without further Changes to the RPS as suggested in Appendix 1A (final paragraph before the commencement of Table 17)</p> | |
| <p>Policy UD.3: Plan changes that provide for significant development capacity – consideration</p> <p>For local authorities with jurisdiction over part, or all, of an <i>urban environment</i>, when determining whether a plan change for <i>urban development</i> will be treated as adding significantly to development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release, the following criteria must be met:</p> | <p>WIAL seeks that the RPS appropriately recognises that in some situations housing developments can be appropriately</p> | <p>Amend the clause (f) of Policy UD.3 as follows:</p> <p>....</p> <p><i>(f) the plan change can demonstrate it will mitigate any potential adverse effects on the ability of</i></p> |

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| <p>(a) the plan change makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage identified through monitoring or otherwise for:</p> <ul style="list-style-type: none"> (i) a variety of housing that meets the regional, district, or local shortage of housing in relation to the particular type, size, or format, or (ii) business space or land of a particular size or locational type, or (iii) community, cultural, health, or educational facilities; and <p>(b) a plan change will make a significant contribution to a matter in (a) if it:</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 manner, and (iii) responds to demonstrated demand for the land use types proposed, for the short-medium term in that location; and <p>(c) where it provides for housing, the plan change will:</p> <ul style="list-style-type: none"> (i) as part of a mix of housing typologies, provide for <i>high density development</i> or <i>medium density development</i>, and (ii) contribute to increasing housing affordability through a general increase in supply or through providing non-market housing; and <p>(d) the required <i>infrastructure</i> can be provided effectively and efficiently for the proposal, and without material impact on the capacity provided by existing or committed <i>infrastructure</i> for other feasible, reasonably expected to be realised developments, in the short-medium term; and</p> <p>(e) the plan change justifies the need for additional <i>urban-zoned</i> land in that particular location to meet housing and business demand, demonstrating consideration of existing feasible, reasonably expected to be realised development capacity within existing <i>urban zones</i>; and</p> <p>(f) the plan change can demonstrate it will mitigate any potential adverse effects on the ability of existing <i>urban areas</i> and <i>rural areas</i> to be well-functioning, including by minimising potential <i>reverse sensitivity</i> effects and</p> | <p>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 770 of the RMA.</p> <p><u>Within these areas, minimisation of reverse sensitivity effects is insufficient, and avoidance may also be an appropriate land use management response.</u></p> | <p><i>existing urban areas and rural areas to be well-functioning, including by minimising avoiding potential reverse sensitivity effects and impacts on the feasibility, affordability, or deliverability of urban development anticipated by the district plan.</i></p> |
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| <p>impacts on the feasibility, affordability, or deliverability of <i>urban development</i> anticipated by the <i>district plan</i>.</p> <p>Explanation Policy UD.3 outlines the criteria that need to be met for a development to be considered to provide ‘significant development capacity’ as required by clause 3.8(3) of the National Policy Statement on Urban Development 2020. Responsive planning applies to both greenfield and brownfield (infill/intensification) developments. All of Policy 55 will also need to be considered for any out-of-sequence or unanticipated plan change for greenfield development.</p> <p>For proposals that are providing for housing, they can provide for <i>high density development</i> or <i>medium density development</i> through a relevant residential zone, a centre zone or a mixed use zone, and by clustering housing to suit the site characteristics if necessary.</p> | | |
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