

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.6: Indigenous ecosystems

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S85 Lachlan Patterson</b>	S85.005	General comments - overall	Support	Strongly support the provisions strengthening protection and enhancement of our biodiversity, given the significant biodiversity crisis we are also faced with.	Retain as notified.
<b>S17 Chelsea Kershaw</b>	S17.004	General comments - indigenous ecosystems	Support	The biodiversity provisions throughout the RPS are supported.	Retain, refine and enhance provisions.
<b>S22 Tegan McGowan</b>	S22.004	General comments - indigenous ecosystems	Support	Support the provisions supporting biodiversity.	Retain, refine and enhance provisions.
<b>S24 Helen Payn</b>	S24.004	General comments - indigenous ecosystems	Support	The biodiversity provisions are supported.	Retain, refine and enhance provisions.
<b>S28 Philippa Yasbek</b>	S28.002	General comments - indigenous ecosystems	Support	Support indigenous biodiversity provisions.	Retain as notified.
<b>S32 Director-General of Conservation</b>	S32.005	General comments - indigenous ecosystems	Support	<p>The proposed changes give effect to s30 and 31 of the Act, and are consistent with Te Mana o te Taiao Aotearoa New Zealand Biodiversity Strategy 2020 and the associated Implementation Plan 2022. They are also consistent with the exposure draft NPS for Indigenous Biodiversity.</p> <p>The references to Public Conservation Land not adequately representing all types of indigenous ecosystem, and having few options for expansion, are an accurate reflection of the situation, and provide support for the approach taken to other changes in this chapter.</p>	Retain as notified, except where specific changes are requested below.
<b>S35 Oliver Bruce</b>	S35.007	General comments - indigenous	Support	Support provisions relating to indigenous biodiversity.	Retain, refine and enhance provisions.

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		ecosystem s			
<b>S37 Jennifer Van Beynen</b>	S37.007	General comments - indigenous ecosystem s	Support	Support provisions relating to indigenous biodiversity.	Retain, refine and enhance submissions.
<b>S51 Khoi Phan</b>	S51.008	General comments - indigenous ecosystem s	Support	Support the provisions supporting biodiversity.	Retain, refine and enhance provisions.
<b>S53 Ellen Legg</b>	S53.007	General comments - indigenous ecosystem s	Support	Support the provisions supporting biodiversity.	Retain as notified.
<b>S60 Grant Buchan</b>	S60.008	General comments - indigenous ecosystem s	Support	Support provisions supporting biodiversity.	Retain, refine and enhance provisions.
<b>S61 Patrick Morgan</b>	S61.008	General comments - indigenous ecosystem s	Support	Support provisions supporting biodiversity.	Retain, refine and enhance provisions.
<b>S64 Rachel Bolstad</b>	S64.006	General comments - indigenous ecosystem s	Support	Support provisions relating to indigenous biodiversity.	Retain, refine and enhance provisions.
<b>S76 Gene Clendon</b>	S76.008	General comments - indigenous	Support	Support provisions for biodiversity.	Retain, refine and enhance provisions.

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		ecosystems			
<b>S80 Anders Crofoot</b>	S80.005	General comments - indigenous ecosystems	Oppose	These issues would be better reviewed in their entirety in the 2024 RPS review when they could be more properly informed by the upcoming NPS for Indigenous Biodiversity.	Delete all the proposed amendments to Chapter 3.6 including text, issues, objectives and table.
<b>S90 Bronwyn Bell</b>	S90.008	General comments - indigenous ecosystems	Support	Support provisions relating to indigenous biodiversity.	Retain, refine and enhance provisions.
<b>S92 Ruby Miller-Kopelov</b>	S92.004	General comments - indigenous ecosystems	Support	The biodiversity provisions are supported.	Retain, refine and enhance provisions.
<b>S93 Isabella Cawthorn</b>	S93.004	General comments - indigenous ecosystems	Support	The biodiversity provisions are supported.	Retain, refine and enhance provisions.
<b>S94 Guardians of the Bays Incorporated</b>	S94.011	General comments - indigenous ecosystems	Support	Not stated	Retain as notified
<b>S113 Wellington Water</b>	S113.006	General comments - indigenous ecosystems	Support in part	The provisions for indigenous biodiversity do not create appropriate planning pathways to allow for the benefits of regionally significant infrastructure. 'Protect' is a very strong term and we will struggle to achieve this in many locations. The provisions could lead to an increase in fatal flaws for our projects required to deliver Te Mana o te Wai and our services, so the provisions need to be nuanced to allow for the benefits of RSI.	Provide the most appropriate pathways for delivering RSI and its benefits by either <ul style="list-style-type: none"> <li>• Deleting this component of the RPS change</li> <li>• Updating the RPS change to reflect the final gazetted version of the NPS-IB</li> <li>• Reflecting the provisions for specified infrastructure and associated benefits in the NPS-IB exposure draft in the RPS.</li> </ul>

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<b>S115 Hutt City Council</b>	S115.014	General comments - indigenous ecosystems	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
<b>S126 Templeton Kapiti Limited (TKL)</b>	S126.009	General comments - indigenous ecosystems	Support	The TKL Land could implement the Indigenous Biodiversity Amendments.	Retain as notified.
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.005	General comments - indigenous ecosystems	Support in part	In principle Ātiawa support the intent of the provisions to address the degradation of indigenous ecosystems and habitats. Ātiawa is pleased that Regional Council is taking steps to better provide for mana whenua through including reference to mātauranga Māori, mahinga kai values, and generally improving provision for mana whenua involvement in resource management.	Ātiawa seeks further reference to mana whenua values and their relationship with their culture, land, water, sites, wāhi tapu and other taonga and to partner with regional and district council in the process to identify and schedule indigenous ecosystems and habitats.
<b>S133 Muaūpoko Tribal Authority</b>	S133.016	General comments - indigenous ecosystems	Support in part	Requests a process for co-designing a regional and local expression of Te Rito o te Harekeke with iwi to give effect to clause 3.2 of the exposure draft of the NPSIB (once gazetted).	Include a policy, or method, or both, providing for the development of a regional and local expression of Te Rito o Te Harekeke, to be codesigned with tangata whenua, including Muaūpoko
<b>S136 DairyNZ</b>	S136.005	General comments - indigenous ecosystems	Oppose	<p>The Indigenous Ecosystems chapter should be paused to be considered in the full review of the RPS, following meaningful engagement and further understanding of the national direction from the NPS-IB which will play a crucial role in setting the direction for the Region.</p> <p>By delaying the introduction of the Indigenous Ecosystems chapter will remove any pre-emptive guessing as to what the finalised NPS-IB will include as well as the other national tools being introduced impacting the RPS.</p>	<p>Delete changes and address issues through a full review of the RPS.</p> <p>Separate out indigenous ecosystems into separate provisions to focus on freshwater and indigenous biodiversity to align with the implementation of the NPS-IB and NPS-FM.</p>

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				Believe that the Indigenous Ecosystems should be separated out to focus on Freshwater and chapter Indigenous Biodiversity separately to allow for the implementation of the NPS-IB and the NPS-FM respectively.	
<b>S140 Wellington City Council (WCC)</b>	S140.017	General comments - indigenous ecosystems	Support	Support as proposed.	Retain as notified.
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.006	General comments - indigenous ecosystems	Not Stated / Neutral	It appears that pursuant to Appendix 1A there are limits on biodiversity offsetting and compensation for certain species. The provisions of the RPS appear to then 'rule out' offsetting and compensation when even individual specimens of a species, or even part of their habitat will be lost due to a project, irrespective of whether the loss may in ecological terms be capable of being offset or compensated to produce a net gain. In the case of the Airport, and for activities such as the ongoing protection of physical assets and infrastructure, it may not always be possible to avoid impacts to habitats or certain species (e.g. giant kelp may be present in and around the sea wall and end of the runway area where ongoing maintenance is often required to protect the road, cycleway, underground services and runway). Particularly concerned that the changes to the biodiversity provisions within the RPS could unduly constrain development within the Airport environs, including projects which may be necessary to adapt to the ongoing effects of climate change (e.g sea level rise and associated protection).	The RPS needs to provide clear provisions which properly recognise the significant benefits of existing regionally significant infrastructure, and which enable its protection and adaptation. WIAL is particularly concerned that the changes to the biodiversity provisions within the RPS could unduly constrain development within the Airport environs, including projects which may be necessary to adapt to the ongoing effects of climate change (e.g sea level rise and associated protection).
<b>S152 Michelle Ducat</b>	S152.009	General comments - indigenous ecosystems	Support	Support provisions relating to indigenous biodiversity.	Provisions should be retained, refined and enhanced.
<b>S162 Winstone Aggregates</b>	S162.040	General comments - indigenous ecosystems	Oppose in part	Provisions do not allow for consideration of 'big picture' biodiversity gains - requiring that all existing values are protected can result in perverse outcomes. E.g. where a small extent of biodiversity loss is required in one location to facilitate much greater biodiversity gains.	Objective and Policy framework in this chapter be amended to allow offsetting taking into account "big picture" biodiversity gains.

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<b>S163 Wairarapa Federated Farmers</b>	S163.026	General comments - indigenous ecosystems	Oppose	Indigenous ecosystem issues and objectives would more properly be considered in the full review of the RPS scheduled in 2024, informed by the upcoming NPS for Indigenous Biodiversity (NPS-IB).	That the proposed amendments to Chapter 3.6 be deleted
<b>S163 Wairarapa Federated Farmers</b>	S163.027	General comments - indigenous ecosystems	Oppose	Do not agree that any of the proposed indigenous ecosystem provisions are freshwater instruments, refer to submission for further information about relevant case law.	Delete FW icons
<b>S164 Megan Lane</b>	S164.007	General comments - indigenous ecosystems	Support	Support provisions relating to indigenous biodiversity.	Provisions should be retained, refined and enhanced.
<b>S167 Taranaki Whānui</b>	S167.032	General comments - indigenous ecosystems	Support	Taranaki Whānui want to signal their intention to be involved in partnership and decision-making regarding indigenous ecosystems.	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.014	General comments - indigenous ecosystems	Support in part	Rangitāne o Wairarapa support the intention of the plan change to include provisions which seek to give effect to the Exposure Draft of the National Policy Statement for Indigenous Biodiversity (NPS IB) now, rather than waiting for this policy statement to be formally gazetted.	Retain provisions that seek to give effect to the exposure draft NPSIB.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.017	General comments - indigenous ecosystems	Support in part	Rangitāne o Wairarapa acknowledges the inclusion of biodiversity offsetting and environmental compensation provisions.	Seek amendments to ensure the proposed policies and definitions are consistent with best practice and give full effect to the NPS IB when it becomes operative.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.067	General comments - indigenous ecosystems	Support in part	The integration of the concept of Te Rito o Te Harekeke through the plan change is supported, however Rangitāne o Wairarapa would like to note that they consider the whakatauki in the Exposure Draft NPS IB is inappropriate for describing this concept in their rohe. Rangitāne o Wairarapa request that a regional and local expression of Te Rito o te	Include a policy, or method, or both, providing for the development of a regional and local expression of Te Rito o Te Harekeke, to be codesigned with tangata whenua and incorporated into the RPS by no later than 2024.

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				Harekeke is developed and codesigned with tangata whenua, and in consultation with the wider community, to give effect to clause 3.2 of the Exposure Draft NPS IB (once gazetted).	
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.098	General comments - indigenous ecosystems	Support	Rangitāne o Wairarapa supports the amendments to Method 21.	Retain as notified.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.0110	General comments - indigenous ecosystems	Oppose	Council does not support amendments to this Chapter until the NPS-IB has been gazetted. Changing this chapter at this time will result in duplication of effort and waste of ratepayer's money, and mana whenua resources, throughout the whole region.	Retain as operationally written and review once NPS-IB has been gazetted
<b>S11 Outdoor Bliss Heather Blissett</b>	S11.009	Indigenous ecosystems introductory text	Support in part	Spelling mistake in introductory text	Change <b>Rimutaka</b> to how it is spelt: <b>Remutaka</b>
<b>S100 Meridian Energy Limited</b>	S100.009	Indigenous ecosystems introductory text	Support in part	The RPS should refer to 'indigenous' biodiversity and 'indigenous' ecosystems. Here, and throughout proposed RPS Change #1, if changing the text in relation to wetlands, the opportunity should be taken to (more 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.	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: <ul style="list-style-type: none"> <li>• Modification and, in some cases, destruction of ecosystems by pest plants and animals grazing animals and clearance of indigenous vegetation</li> <li>• Contamination of aquatic ecosystems by sediment, pollutants and nutrients</li> <li>• Destruction of ecosystems as a result of development</li> <li>• Modification of <b>natural</b> waterways, such as draining natural wetlands and channelling, constraining or piping of natural waterways rivers and streams</li> <li>• Contamination of coastal ecosystems by</li> </ul>

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					<p>stormwater and sewage discharges</p> <p>Although New Zealand has an.... However, there is still much work to be done to <b>protect and improve the ecological integrity</b> <del>conservation status</del> of many <b>remnant indigenous ecosystems and habitats of indigenous faunanative ecosystems and species</b>. The restoration of indigenous ecosystems on public, iwi and private land provides both public and private benefit.</p> <p>...</p> <p>The indigenous ecosystems most reduced in extent are specifically:</p> <p>(a) <b>natural wetlands...</b> "</p>
<p><b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b></p>	<p>S102.052</p>	<p>Indigenous ecosystems introductory text</p>	<p>Support</p>	<p>Generally supports the inclusion of the 'Chapter Introductions' for 'Indigenous ecosystems'.</p>	<p>Retain as notified.</p>
<p><b>S115 Hutt City Council</b></p>	<p>S115.015</p>	<p>Indigenous ecosystems introductory text</p>	<p>Oppose</p>	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	<p>Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.</p>



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<p><b>S131</b> <b>Ātiawa ki Whakaron gotai Charitable Trust</b></p>	<p>S131.030</p>	<p>Indigenous ecosystems introductory text</p>	<p>Support in part</p>	<p>In principle Ātiawa supports the intent of Chapter 3.6. Ātiawa seeks reference to not only iwi, but also whānau and hapū. It is a dated approach to refer to iwi as an all encompassing group, although whānau and hapū make up an iwi, appropriate recognition must be given to whānau and hapū especially in the context of action to protect, maintain and enhance of indigenous ecosystems where whānau and hapū undertake their own efforts to restore ecosystems. Ātiawa note that some definitions are bold and italicised and others are just in italics, this approach is inconsistent and it is not clear what the rationale is for this distinction. Ātiawa seek that mana whenua and landowners are provided for in separate issue statements. Our values and role as mana whenua is not the same as landowners (unless it is in reference to Māori landowners) and should be recognised and provided in accordance with Te Tiriti and the RMA.</p>	<p>Amend to: Although New Zealand has an extensive network of public conservation land (comprising over a third of the country), this does not adequately represent all types of indigenous ecosystem. With few options to expand the public conservation estate, the restoration of ecosystems relies upon the good will and actions of landowners. There are a number of individuals, <b>whānau, hapu, iwi, and</b> community groups and organisations throughout the region that are working to restore indigenous ecosystems. Public supports for restoring indigenous ecosystems on public land and landowners retiring farmland has led to the regeneration of indigenous bush in rural gullies, along riparian margins, in regional parks and in urban backyards. This has led to increases in some indigenous habitats, such as in the hills around Wellington City, with sanctuaries such as Zealandia and pest control efforts increasing the number and variety of native birds 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, <b>whānau, hapū, iwi</b> and private land provides both public and private benefit... <b>3. Iwi Mana whenua/tangata whenua and landowner values and roles</b> are not adequately recognised and supported. Mana whenua /tangata whenua values, including kaitiakitanga, are not adequately recognised and supported by the current approach to managing indigenous biodiversity. <del>The conservation efforts of</del></p>

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					<del>landowners, as stewards of their land, and local communities could be better recognised and supported.</del>
<b>S147 Wellington Fish and Game Council</b>	S147.018	Indigenous ecosystems introductory text	Support in part	<p>Proposed Change 1 to replace "loss of species, loss of overall diversity of species, loss of an ecosystems ability to function on an ongoing basis, and loss of complete ecosystems and types of ecosystems" with "the composition, richness and indigenous dominance of communities, functions of ecosystem processes, or the extent of the ecosystem remaining" in Chapter 3.6 Introduction is unclear and inappropriately narrow. It is also unnecessary to give effect to the NPS-FM.</p> <p>Restricting the Chapter 3.6 Introduction as proposed excludes the habitats of valued introduced species such as trout, salmon, and gamebirds, and;</p> <ul style="list-style-type: none"> <li>• will introduce potential adverse environmental effects (such as trophic cascades);</li> <li>• adopts a values-based approach to policies and management rather than science based; and</li> <li>• does not give effect to Policy 10 of the NPS-FM</li> </ul>	Amend the 'Ecosystem health' paragraph. Ecosystem health can be measured in a number of ways, including the composition, richness and <del>indigenous</del> dominance of <b>valued indigenous and introduced species communities</b> , <del>function of ecosystem processes</del> (e.g., degree to which it is connected or fragmented), or the extent of the ecosystem remaining.
<b>S163 Wairarapa Federated Farmers</b>	S163.028	Indigenous ecosystems introductory text	Oppose	Defer to the full review of the RPS in 2024, at which time the introduction can be informed by careful analysis and interpretation of up-to-date regional state of the environment data. Refer to submission for more detail.	Delete the proposed amendments to the introduction. Delete the FW icon
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.020	Indigenous ecosystems introductory text	Support in part	Needs explanation to ensure it's clear how the plan is giving effect to the NPS-IB and therefore the RMA	The chapter introduction needs to include an explanation of Te Rito o te Harakeke to explain the link to the NPS-IB.
<b>S167 Taranaki Whānui</b>	S167.033	Indigenous ecosystems	Support in part	Taranaki Whānui supports the reference to mahinga kai.	Taranaki Whānui want to see the acknowledgement of partnership from the outset which sets a precedent for the objectives, policies, and methods of this amended

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		introductory text			chapter.  Suggest adding reference to Te Rito o te Harakeke and the partnership role of mana whenua in the execution of this concept.  Suggest adding text to include recognition of the intrinsic value and mauri of indigenous biodiversity as well as people's connections and relationships with it.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.066	Indigenous ecosystems introductory text	Support	Rangitāne o Wairarapa supports the changes to recognise the separate roles of mana whenua/tangata whenua and landowners. However, Rangitāne o Wairarapa wishes to amend the wording in the introduction to more accurately acknowledge the history and issues of our region.	Amend the sentence ("The area of indigenous ecosystems has been in decline since humans first settled in our region") to highlight that the decline of indigenous biodiversity is a settler impact. The first humans of this land were tangata whenua and we are not settlers.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.016	Indigenous ecosystems introductory text	Oppose in part	Iwi and landowner values- roles are not adequately recognised and provided for. These are two different matters and need to be decoupled on page 29. It would invite confusion to bring two matters in one phrase.	Split the statement of Iwi values and landowner values into two paragraphs.
<b>S167 Taranaki Whānui</b>	S167.034	Issue 1: The region's indigenous ecosystems are reduced in extent	Support	Taranaki Whānui supports the inclusion of Issue 1, in particular its reference to mahinga kai.	Retain as notified.
<b>S167 Taranaki Whānui</b>	S167.035	Issue 2: The region's remaining ecosystems are under threat	Support in part	Taranaki Whānui support the principle of Issue 2. Remiss to not refer to damage done by agriculture.	Request that reference to the damage done to indigenous ecosystems by farming practices, in particular grazing animals/land clearance is added.

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<b>S167 Taranaki Whānui</b>	S167.036	Issue 3: Iwi and landowner values and roles are not adequately recognised and supported	Support	Taranaki Whānui supports the inclusion of Issue 3, in particular the reference to kaitiakitanga and the 'managing' of indigenous biodiversity.	Retain as notified.
<b>S16 Kāpiti Coast District Council</b>	S16.057	Objective 16	Support in part	<p>Although Council supports the general intent of the objective, some elements are opposed.</p> <p>Council opposes the use of regulatory methods to require city and district councils to achieve restoration and enhancement of biodiversity values - it is only "maintenance" of indigenous biodiversity that is provided for under the RMA.</p> <p>Council also notes the use of and / or implies a choice can be made. This is an issue across RPS Change 1 where it appears GRWC is unsure whether there should be a choice or not. We request all instances of 'and / or' are reviewed and 'and' or 'or' are specifically used where appropriate.</p>	Ensure all regulatory methods proposed to require enhancement and restoration are not the responsibility of city and district councils. All instances of 'and / or' are reviewed and 'and' or 'or' are specifically used where appropriate.
<b>S30 Porirua City Council</b>	S30.013	Objective 16	Oppose	It is unclear over what timeframe this objective is to be achieved, how it is to be measured, and whether it is this gradual or absolute.	Amend the objective so that it is clear what the outcomes sought are.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.072	Objective 16	Support in part	Council notes that 'protect' and 'enhance' is a change in direction that may be difficult to achieve within the context of limited resources.	If objective is retained, amend the policy to read: "Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are <del>protected, enhanced</del> <b>maintained and where possible enhanced</b> , and restored to a healthy functioning state"
<b>S79 South Wairarapa District Council</b>	S79.009	Objective 16	Support in part	Measures to protect biodiversity can be applied in the short term, or are already included in Council's regulatory documents. SWDC has protected Significant Natural Areas as part of the Combined Wairarapa District Plan for over 10 years. This is proposed to continue. However, the Objective should more appropriately reflect that it will take time to return ecosystems and habitats to a healthy functioning	Amend Objective 16 as follows: Indigenous ecosystems and habitats with significant ecosystem <b>functions and services</b> and/or biodiversity values are protected, and <b>over time enhanced</b> , and restored to a healthy functioning state.

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				state.  It is acknowledged that the often- promised National Policy Statement for Indigenous Biodiversity has not yet materialised. However, on the face of the provisions many of the matters within previous exposure drafts have been incorporated. The process managing the changes to the RPS needs to be alive if the proposed NPS does occur.	Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought, unless the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.
<b>S100 Meridian Energy Limited</b>	S100.010	Objective 16	Oppose in part	Enhancement and restoration will not be the only, or the appropriate, response in all situations.	Amend Objective 16 in the following (or similar) manner): "Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are maintained protected <b>and, where appropriate, are</b> enhanced, and restored to a healthy functioning state."
<b>S115 Hutt City Council</b>	S115.016	Objective 16	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.  We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
<b>S123 Peter Thompson</b>	S123.009	Objective 16	Support	It is vital that the indigenous ecosystems and habitats of the region are maintained	Retain as notified.
<b>S129 Waka Kotahi NZ Transport Agency</b>	S129.021	Objective 16	Support in part	Generally supports but consider that 'protected' is too strong of a directive. The policy should be amended to be in keeping with the exposure draft of the National Policy Statement for Indigenous Biodiversity.	Amend Objective 16 as follows: Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are <b>maintained protected</b> , enhanced, and restored to a healthy functioning state.

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<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.031	Objective 16	Support	In principle Ātiawa supports Objective 16. Ātiawawould like to be involved in any process that identifies significant sites to ensure that mana whenua are part of decision-making that could involve land held by Māori.	Retain as notified.
<b>S134 Powerco Limited</b>	S134.003	Objective 16	Oppose	<p>A requirement to enhance and restore, as well as protect, significant indigenous ecosystems and habitats in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. It is more onerous than the direction set in the exposure draft of the NPS Indigenous Biodiversity around the interface between specific infrastructure and indigenous biodiversity, which recognises there may be situations in which there are no practicable alternatives to locating in areas of significant indigenous vegetation or significant habitats of indigenous fauna, and effects are to be managed in accordance with an effects management hierarchy. This is particularly in the context that the definition of 'restoration' sets a clear expectation that the condition of the environment should be returned to a former state.</p> <p>In the Operative RPS, Objective 16 provides for the 'maintenance' of indigenous ecosystems and habitats. The proposed shift from 'maintaining' to 'protecting' indigenous ecosystems and habitats creates the potential for the Objective to be interpreted as a proxy avoidance Objective and is opposed.</p> <p>The objective should be amended to reflect the provisions for specific infrastructure in the NPS Indigenous Biodiversity, which is currently anticipated for gazettal in December 2022. At a minimum, the objective should be amended to recognise that enhancement and restoration will not be the only, or the appropriate, response in all situations.</p>	<p>Amend Objective 16 to recognise that enhancement and restoration of indigenous ecosystems and habitats may not be appropriate in all circumstances. This could be achieved by making changes along the following lines:</p> <p>"Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values <b>are maintained protected and, where appropriate, enhanced, and or</b> restored to a healthy functioning state."</p>
<b>S136 DairyNZ</b>	S136.006	Objective 16	Oppose in part	<p>In relation to indigenous vegetation and indigenous habitats, the wording as proposed goes beyond that required under S6 of the RMA which requires (emphasis ours) "The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna are of national importance".</p> <p>Regional Plans, District Plans and other lower level planning</p>	<p>Delete Objective 16 and address the issue through a full review of the RPS OR Amend Objective 16 as follows (or words to similar effect): <b>Significant indigenous Indigenous</b> ecosystems and habitats with significant <del>ecosystem functions and services and/or</del></p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.6: Indigenous ecosystems

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>documents that are required to 'give effect to' the RPS are more appropriate avenues for considering where and whether to extend these protections beyond areas of significance.</p> <p>The NPS-FM does provide direction in relation to indigenous ecosystems than directed in the RMA. However, as with the majority of freshwater related provisions in PC1 any amendments aimed at giving effect to the NPS-FM should be considered together.</p>	biodiversity values are maintained <del>protected, enhanced,</del> and restored to a healthy functioning state.
<b>S140 Wellington City Council (WCC)</b>	S140.018	Objective 16	Support	Support as proposed.	Retain as notified.
<b>S144 Sustainable Wairarapa Inc</b>	S144.014	Objective 16	Support	It is vital that the indigenous ecosystems and habitats of the region are maintained as our biodiversity continues to decline. It is important that somewhere in the document, the need for controlling pest animals and plants is highlighted. Ideally funding needs to be found to restore our indigenous ecosystems - if pest species are removed from remnants, these systems can bounce back.	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.019	Objective 16	Support in part	<p>Supports the broadening of this objective beyond indigenous ecosystems and habitats.</p> <p>A focus on indigenous biodiversity, habitat, and ecosystems at the expense of other valuable habitats fails to give proper effect to the NPS-FM, and the recognition in Part 3.5(1)(a) of the NPS-FM of the interconnectedness of the whole environment. That recognition is in turn reflected in the attributes of ecosystem health in Appendix 1.A of the NPS-FM, which do not distinguish between indigenous and other valued habitats.</p> <p>As drafted, however, Proposed Change 1 does not give proper effect to Policy 10 of the NPS-FM which specifically recognises the need to protect the habitat of trout and salmon. The suggested amendment addresses this deficiency.</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those habitats containing valued introduced species.</p> <p>An unduly narrow Indigenous - centric focus could lead to</p>	<p>Amend.</p> <p>Indigenous ecosystems, and habitats <b>which support</b> significant ecosystem functions, services, <b>valued species</b> and/ or biodiversity values, are protected, enhanced, and restored to a healthy functioning state.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				lessening or removal of protections for non-indigenous dominant systems, habitats, and species. Even ecosystems that may not be considered to be "indigenous dominant", can play a significant role in the restoration of indigenous biodiversity. They are also important for the maintenance of valued non-indigenous species, such as trout, salmon, and gamebirds. The loss of protections, enhancements, and restorations of these habitats risks adverse environmental effects and weakened climate change resilience for the region.	
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.039	Objective 16	Oppose in part	WIAL acknowledges that this objective is generally consistent with section 6 requirements in the RMA relating to indigenous biodiversity outcomes. However when coupled with the ensuing policies and offsetting and compensation limitations, WIAL is concerned that this suite of provisions could significantly impact on infrastructure projects, including those which may be necessary to protect existing infrastructure assets such as maintenance of the seawall surrounding the airport. It may not always be able to enhance and restore existing ecosystems which may be affected by a development or project, however with appropriate offsetting or compensation overall ecosystem health could be improved and protected.	Amend the objective as follows: Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are protected, enhanced, <b>and restored where appropriate and in accordance with an effects management hierarchy in order to achieve an overall healthy functioning state.</b>
<b>S151 NZ Centre for Sustainable Cities</b>	S151.016	Objective 16	Support in part	Objective 16 is poorly supported by related policies or methods that protect or enhance or restore those significant ecosystem functions.  New urban developments around travel corridors offer an important opportunity for protection or enhancement of vital ecosystem functions that in turn provide essential services that support ecosystem and human wellbeing.	Include stronger supporting policies and/or methods to enhance or restore significant ecosystem functions.
<b>S163 Wairarapa Federated Farmers</b>	S163.030	Objective 16	Oppose	Defer to the full review of the RPS in 2024.  The proposed amendments are "muddying" an RMA s6 matter, ie, the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna	That the amendments to Objective 16 be deleted. To the extent amendments are made, delete the FW icon
<b>S165 Royal Forest and Bird Protection Society of</b>	S165.021	Objective 16	Support in part	As written this objective does not give effect to s6(c) of the RMA and needs to include protection of significant habitats of indigenous fauna which could be exotic.	Support protection and enhancement. However, this objective needs to be broader than just indigenous ecosystems and habitats to ensure protection of significant habitats of indigenous fauna. For example, macrocarpa shelter belts can be important roosts for long-tailed bats as can exotic pine forests for



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>New Zealand Inc. (Forest &amp; Bird)</b>				Policies and methods need to align to give effect to s6(c) of the RMA.	Powelliphanta snails.  Seek consequential changes to policies and methods to ensure significant habitats of indigenous fauna are also protected as per comment above.
<b>S166 Masterton District Council</b>	S166.012	Objective 16	Support in part	Support in part (our interpretation of the Objective's intention).  Oppose in part due to possible unforeseen implications for TAs roles and responsibilities which could be unaffordable for our community.  What it looks like in practice could have significant consequences and costs.	Retain as notified. However: MDC requests involvement in the development of any plans or policies relating to this objective.
<b>S167 Taranaki Whānui</b>	S167.037	Objective 16	Support	Taranaki Whānui support the principle of Objective 16. In particular, we note the inclusion of Method 32 and 'partnering with mana whenua' and Method IE.2.	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.068	Objective 16	Support	Rangitāne o Wairarapa support this policy and the proposed changes with respect to protection and enhancement of indigenous biodiversity.	Retain as notified
<b>S16 Kāpiti Coast District Council</b>	S16.059	Objective 16A	Support	The intent of the objective is supported.	Retain
<b>S30 Porirua City Council</b>	S30.014	Objective 16A	Oppose	It is unclear over what timeframe is this objective to be achieved, how it is to be measured, and whether it is this gradual or absolute. This objective is similar to Objective 16 but frames outcomes sought differently, it could be deleted if objective 16 was amended.	<i>[Note: Reasoning references Objective 16, Chapter 3.6 Indigenous ecosystems]</i>  Either delete objective, or amend the objective so that it is clear what the outcomes sought are.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper</b>	S34.079	Objective 16A	Oppose	Intent of objective is supported but is inappropriate until the NPS-IB is gazetted.	Delete in its entirety and review once the NPS-IB has been gazetted.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Hutt City Council</b>					
<b>S100 Meridian Energy Limited</b>	S100.011	Objective 16A	Oppose in part	Objective 16 seeks to protect (and, where appropriate enhance and restore) significant indigenous ecosystems and habitats. Objective 16A seeks to maintain other (non-significant) indigenous ecosystems. As with Objective 16, enhancement and restoration will not be the only or appropriate response in all situations and the wording should reflect this. Also, the last part of the objective is not necessary because a 'healthy functioning state' will have resilience against the pressures described. Improving resilience and giving effect to Te Rito o te Harakeke should be addressed by proposed policies that set out how the 'maintain' and 'enhance' outcome is to be achieved (and, in large measure the policies already do this). It seems incongruent that improving resilience should be a desired outcome for non- significant indigenous ecosystems and habitats, but is not a desired outcome for significant indigenous ecosystems and habitats.	Amend Objective 16A as follows (or in a similar manner to achieve the same effect): "The region's indigenous ecosystems are maintained <b>and, where appropriate,</b> enhanced, and restored to a healthy functioning state., <del>improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.</del> "
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.053	Objective 16A	Support	Generally supports the objectives in the 'Indigenous ecosystems' chapter.	Retain as notified.
<b>S115 Hutt City Council</b>	S115.019	Objective 16A	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.  We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
<b>S123 Peter Thompson</b>	S123.010	Objective 16A	Support	It is vital that the indigenous ecosystems and habitats of the region are maintained	Retain as notified.
<b>S131 Ātiawa ki Whakaron gotai</b>	S131.032	Objective 16A	Support in part	Ātiawa seeksthat pre-notification drafting of Objective 16A be reinstated and current RPS Change 1 Objective 16A is deleted. There is no direct reference to ecosystem health, ecological integrity, and ecological connectivity of indigenous	Amend: <b>Objective 16A The ecosystem health, ecological integrity and ecological connectivity of the region's indigenous</b>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Charitable Trust				ecosystems in the current wording of Objective 16A. This appears to be an oversight as these factors are outlined as key issue and should be addressed as an objective.	<b>ecosystems, and the ecological processes that supports them, are enhanced, maintained and restored, so that indigenous biodiversity and mahinga kai is thriving and is resilient to environmental pressures particularly climate change, and giving effect to Te Rito o te Harakeke.</b>
S133 Muaūpoko Tribal Authority	S133.017	Objective 16A	Support in part	Supports the maintenance, enhancement and restoration of indigenous ecosystems and the acknowledgement of the roles of tangata whenua, including Muaūpoko and landowners.	Include specific reference to Muaūpoko's relationship with indigenous ecosystems. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tara is recognised.
S134 Powerco Limited	S134.004	Objective 16A	Oppose	<p>As per Objective 16, a requirement to enhance and restore, as well as maintain, indigenous ecosystems and habitats in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. It is more onerous than the direction set in the exposure draft of the NPS Indigenous Biodiversity around the interface between specific infrastructure and indigenous biodiversity.</p> <p>Further, it is unclear why specific reference is made in Objective 16A to improved resilience to environmental pressures and Te Rito o te Harakeke in relation to indigenous ecosystems and not in relation to significant indigenous ecosystems, which are addressed in Objective 16. Nor is it clear that improved resilience to environmental pressures will be able to be achieved in relation to all development proposals affecting indigenous ecosystems, for example where maintenance or minor upgrade of existing regionally significant infrastructure is required.</p> <p>The objective should be amended to reflect the provisions for specific infrastructure in the NPS Indigenous Biodiversity, which is currently anticipated for gazettal in December 2022. At a minimum, the objective should be amended to recognise that enhancement and restoration will not be the only, or the appropriate, response in all situations.</p>	<p>Amend Objective 16A to recognise that enhancement and restoration of indigenous ecosystems and habitats may not be appropriate in all circumstances. This could be achieved by making changes along the following lines:</p> <p>"The region's indigenous ecosystems are maintained <b>and, where appropriate, enhanced, and or</b> restored to a healthy functioning state, <del>improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.</del>"</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S136 DairyNZ</b>	S136.007	Objective 16A	Oppose in part	<p>Supports an objective to improve the current state of the regions ecosystem however concerned with the objective's wording and the use of "restoring to a healthy functioning state" which has not been defined and will depend on the outcome of the freshwater plan change process.</p> <p>Support consideration of a focus on significant indigenous biodiversity and habitats as required at s6 of the RMA through amendments to Objective 16 (as above) with a broader focus on s7 matters through an appropriate rewording of this Objective.</p>	<p>Delete Objective 16A and address the issue through a full review of the RPS OR Amend Objective 16A (or words to similar effect):</p> <p>The region's indigenous ecosystems are maintained, enhanced, and restored <del>to a healthy functioning state, increasing their</del> <b>improving</b> resilience to increasing environmental pressures, and giving effect to Te Rito o te Harakeke.</p>
<b>S139 Ian Gunn</b>	S139.004	Objective 16A	Support	Nature-based solutions offer a wide variety of benefits compared to hard infrastructure.	Retain as notified.
<b>S140 Wellington City Council (WCC)</b>	S140.019	Objective 16A	Support in part	Wording should be consistent with the Exposure Draft for the proposed National Policy Statement for Indigenous Biodiversity (NPS-IB).	The region's indigenous <del>ecosystems biodiversity</del> <b>are-is</b> maintained, enhanced, and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.
<b>S144 Sustainable Wairarapa Inc</b>	S144.015	Objective 16A	Support	It is vital that the indigenous ecosystems and habitats of the region are maintained as our biodiversity continues to decline. It is important that somewhere in the document, the need for controlling pest animals and plants is highlighted. Ideally funding needs to be found to restore our indigenous ecosystems - if pest species are removed from remnants, these systems can bounce back.	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.029	Objective 16A	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of</p>	<p>Amend.</p> <p>The region's indigenous ecosystems, <b>and habitats with significant biodiversity or other values</b>, are maintained, enhanced and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	Te Rito o te Harakeke.
<b>S163 Wairarapa Federated Farmers</b>	S163.031	Objective 16A	Oppose	Defer to the full review of the RPS in 2024.	That Objective 16A be deleted. Delete the FW icon
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.022	Objective 16A	Support	This is consistent with the RMA.	Retain
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.023	Objective 16A	Oppose in part	The policies and methods need to give better effect to the RMA. Question how non-regulatory policies, particularly Policy IE.3, and methods are going to achieve the objective. Question how non-regulatory policies, particularly Policy IE.3, and methods are going to achieve the objective. [Note: submission refers to 'Policies and Methods to Achieve Objective 16A']	Suggest additional regulatory policy required to ensure maintenance of biodiversity as per council functions under s31 of the RMA.
<b>S166 Masterton District Council</b>	S166.013	Objective 16A	Support	Support this objective	Retain as notified. However: further work is required to understand the cost implications and what affordability impacts this may have on our communities.
<b>S167 Taranaki Whānui</b>	S167.038	Objective 16A	Support in part	Taranaki Whānui support the principle of Objective 16A. We note the inclusion of Method 32 and 'partnering with mana whenua' and Method IE.3	Include Method IE.1 under Objective 16A.
<b>S168 Rangitāne O</b>	S168.070	Objective 16A	Support	Rangitāne o Wairarapa support giving effect to Te Rito o te Harekeke, noting the above comments which seek the incorporation of a local expression of this concept.	Retain as notified

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Wairarapa Inc</b>					
<b>S16 Kāpiti Coast District Council</b>	S16.060	Objective 16B	Support in part	Council requests the objective refer to mana whenua values rather than tangata whenua values. The practical application of seeking to identify tangata whenua values of those who are not represented by the relevant mana whenua iwi authorities would be an impossible task for city and district councils. Council requests the use of the terms mana whenua/tangata whenua/iwi/hapū and Māori are carefully considered and applied appropriately throughout RPS Change 1 with respect to the practical implications for resource management processes and the requirements of the RMA and relevant higher level statutory planning documents.	Amend Objective 16B by deleting reference to tangata whenua as follows: Objective 16B Mana whenua / <del>tangata whenua</del> values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making, and mana whenua / <del>tangata whenua</del> are supported to exercise their kaitiakitanga for indigenous biodiversity.
<b>S30 Porirua City Council</b>	S30.015	Objective 16B	Oppose	It is unclear what "decision making" refers to. This needs to be better articulated so that it is plan users are able to determine if it is being achieved or not. As worded, it reads more as a policy than an objective. It needs to be reframed so it is clear what the outcome sought to be achieved is.	Amend the objective so that it is clear what the outcomes sought are.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.082	Objective 16B	Support	Notwithstanding the general comments on waiting for the NPS- IB, we support the need to recognise mana whenua values	Retain provision as notified.
<b>S79 South Wairarapa District Council</b>	S79.010	Objective 16B	Support in part	It is acknowledged that the often- promised National Policy Statement for Indigenous Biodiversity has not yet materialised. However, on the face of the provisions many of the matters within previous exposure drafts have been incorporated. The process managing the changes to the RPS needs to be alive if the proposed NPS does occur.	If the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.
<b>S102 Te Tumu Paeroa  </b>	S102.054	Objective 16B	Support	Generally supports the objectives in the 'Indigenous ecosystems' chapter.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Office of the Māori Trustee					
S115 Hutt City Council	S115.017	Objective 16B	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.033	Objective 16B	Support in part	<p>Ātiawa seeks that consistent reference to ecosystems rather than biodiversity is applied to Objective 16B. Ātiawa seeks that reference to support and resourcing is included, it is a significant part of the relationship between local government and mana whenua under Te Tiriti to provide equitable outcomes for mana whenua/tangata whenua. Without adequate support and resourcing mana whenua/tangata whenua are limited in their ability to participate in decision-making, which includes exercising kaitiakitanga.</p>	Placeholder Objective 16B Mana Whenua/tangata whenua values relating to indigenous <del>biodiversity</del> <b>ecosystems</b> , particularly taonga species and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making and mana whenua/tangata whenua <b>are enabled to exercise their kaitiakitanga through adequate support and resourcing</b> <del>are supported to exercise their kaitiakitanga for indigenous biodiversity.</del>
S133 Muaūpoko Tribal Authority	S133.018	Objective 16B	Support in part	<p>Supports the maintenance, enhancement and restoration of indigenous ecosystems and the acknowledgement of the roles of tangata whenua, including Muaūpoko and landowners.</p>	Include specific referenceto Muaūpoko's relationship with indigenous ecosystems. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tarais recognised.
S140 Wellington City Council (WCC)	S140.020	Objective 16B	Support	Support as proposed.	Retain as notified
S147 Wellington Fish and	S147.030	Objective 16B	Support in part	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for in decision-making and their role as kaitiaki is	Amend. Mana whenua/tangata whenua values relating to indigenous biodiversity, particularly taonga species, and

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Game Council				supported. At the same time, to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats.	the important relationship between indigenous ecosystem health and well-being, are <b>recognised and provided for</b> in decision making.. Mana whenua/tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity <b>within a wider framework of equal weighting given to community values around indigenous and valued introduced biodiversity.</b>
S163 Wairarapa Federated Farmers	S163.032	Objective 16B	Oppose	Defer to the full review of the RPS in 2024.	That Objective 16B be deleted. Delete the FW icon
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.024	Objective 16B	Support	This objective is appropriate.	Retain
S166 Masterton District Council	S166.014	Objective 16B	Support	Agree that mana whenua / tangata whenua values are given effect to in decision making and they are supported to exercise their kaitiakitanga for indigenous biodiversity.	Retain as notified.
S167 Taranaki Whānui	S167.039	Objective 16B	Support in part	Taranaki Whānui support the principle of Objective 16B. It is important to note that the implementation of this objective will require adequate resourcing.	Amend the provision to read: ...., and mana whenua / tangata whenua are supported <b>and resourced</b> to exercise their kaitiakitanga for indigenous biodiversity.
S168 Rangitāne O	S168.069	Objective 16B	Support	Rangitāne o Wairarapa support the acknowledgment of the special relationship of mana whenua/tangata whenua with indigenous ecosystem health and wellbeing in this policy	Retain as notified



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Wairarapa Inc</b>					
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.017	Objective 16B	Support	Objective 16B is supported specifically recognising Mana Whenua values relating to indigenous biodiversity and these values are given effect to in decision-making and the roles of mana whenua as kaitiaki are supported and resourced. The use of Policy IE.2 and Policy IE.3 is also fundamental to achieve this objective.	Retain as notified.
<b>S16 Kāpiti Coast District Council</b>	S16.061	Objective 16C	Support	Council supports the recognition of the steward role that landowners and communities play in maintaining, enhancing and restoring indigenous biodiversity.	Retain
<b>S30 Porirua City Council</b>	S30.016	Objective 16C	Oppose	It is unclear how or where these values are to be "recognised and provided for". This needs to be better articulated so that it is plan users are able to determine if it is being achieved or not.	Amend the objective so that it is clear what the outcomes sought are.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.085	Objective 16C	Oppose in part	Council supports and recognises the role of landowners and the community; however, it is unclear how conflicting values and requirements will work in practice to balance and management expectation. Council considers this is inappropriate at this time.	Delete indigenous biodiversity provisions until the NPS-IB is gazetted.
<b>S79 South Wairarapa District Council</b>	S79.011	Objective 16C	Support in part	Where additional materials intended to be used for regulatory and non- regulatory processes are developed is appropriate and necessary that all stakeholders are included.	Retain as notified If the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.055	Objective 16C	Support	Generally supports the objectives in the 'Indigenous ecosystems' chapter.	Retain as notified.
<b>S115 Hutt City Council</b>	S115.018	Objective 16C	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.  We request that all provisions relating to indigenous	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	
<b>S133 Muaūpoko Tribal Authority</b>	S133.019	Objective 16C	Support in part	Supports the maintenance, enhancement and restoration of indigenous ecosystems and the acknowledgement of the roles of tangata whenua, including Muaūpoko and landowners.	Include specific referenceto Muaūpoko's relationship with indigenous ecosystems. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te-Whanganui-a-Tarais recognised.
<b>S136 DairyNZ</b>	S136.008	Objective 16C	Oppose in part	Support the intention to recognise and support landowners, as with the other objectives relating to biodiversity we believe an objective of this nature should be considered through a full review of the RPS.  Also concerned at the use of the word 'steward'. This infers a responsibility of landowners to deliver 'community values' with no clarity around what this may mean in a practical sense.  Dairy farmers hold a significant amount of land and therefore indigenous ecosystems. Needs to ensure that the RPS provides opportunity for farming to continue as a viable operation while working with farmers. The wording of this objective should reflect this intent, without unduly inferring a responsibility on farmers as solely responsible for delivering on community values.	Delete Objective and address the issue through a full review of the RPS OR Amended objective 16C as follows (or words to similar effect):  Landowner and community values in relation to indigenous biodiversity are recognised and provided for. <b>Landowners are engaged with, recognised and their roles as stewards are supported.</b>
<b>S140 Wellington City Council (WCC)</b>	S140.021	Objective 16C	Support	Support as proposed.	Retain as notified.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.025	Objective 16C	Support	This objective is appropriate.	Retain.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.6: Indigenous ecosystems

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S166 Masterton District Council</b>	S166.015	Objective 16C	Support in part	Agree with proposed content, but on the proviso that this objective is not to the detriment of mana whenua/tangata whenua values as per Objective 16B.	Retain as notified. However: Further clarity required to ascertain whether this objective has any impacts on Objective 16B.
<b>S167 Taranaki Whānui</b>	S167.040	Objective 16C	Support	Taranaki Whānui support Objective 16.	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.071	Objective 16C	Support	Rangitāne o Wairarapa support the acknowledgment of the role of landowners, as well as the separation of Objectives 16B and 16C, to ensure that the special relationship that mana whenua/tangata whenua have with indigenous ecosystem health is recognised.	Retain as notified
<b>S129 Waka Kotahi NZ Transport Agency</b>	S129.022	Table 6(a)	Support	Generally supports the intent of Policy 24 but seeks that the wording is consistent with the exposure draft of the National Policy Statement for Indigenous Biodiversity.	Amend Policy 24 as follows: <b>Protecting, Managing</b> indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans
<b>S163 Wairarapa Federated Farmers</b>	S163.029	Table 6(a)	Oppose	Defer to the full review of the RPS in 2024.	Delete Table 6A  OR Amend objectives and policies in Table 6A as per details in submission and make consequential amendments to related methods.  Delete FW icons
<b>S167 Taranaki Whānui</b>	S167.041	Table 6(a)	Support in part	Updated the table to include the amendments suggested by Taranaki Whānui	Updated the table to include the amendments requested to Objective 16A and 16B.