

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S25 Carterton District Council</b>	S25.014	General comments - regulatory policies	Oppose	CDC considers that the approach of scattering climate change, indigenous ecosystems and freshwater policies throughout Chapter 4.1 makes the plan very difficult to use.	Re-label policies so that numbering is continuous, or group the CC, FW and IE policies together.
<b>S32 Director- General of Conservation</b>	S32.009	General comments - regulatory policies	Support in part	The proposed changes appropriately respond to climate change and national direction. In particular, the promotion of indigenous over exotic species for permanent forests (Policy CC.6), and support for nature-based solutions (Policy CC.7), provide additional biodiversity benefits.	Retain as notified, except where specific changes are requested below.
<b>S78 Beef + Lamb New Zealand Limited</b>	S78.005	General comments - regulatory policies	Not Stated / Neutral	Accepts that the amendments to the chapter heading and introduction detailed on page 95 of PC1 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
<b>S82 Jonathan Markwick</b>	S82.004	General comments - regulatory policies	Support	Support all policies that enforce emissions reductions through mode-shift.	Retain as notified.
<b>S82 Jonathan Markwick</b>	S82.005	General comments - regulatory policies	Support	Support all policies and changes that encourage or enable high density housing in the city centre and inner suburbs	Retain as notified.
<b>S94 Guardians of the Bays Incorporated</b>	S94.014	General comments - regulatory policies	Support in part	Supports the proposed amendments to the chapter, such as the new climate change topic and policies and considers the need for inter-regional, national and internal transport framework (primarily rail and sea) with less reliance of transport modes that rely on high greenhouse emissions.	Insert a new policy to support inter-regional, national and internal transport connections that are less reliant on high greenhouse emissions.
<b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b>	S157.023	General comments - regulatory policies	Oppose	Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils. Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to: - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and	Amend Policies 14, FW.3 and 42 to recognise that the absolute thresholds set within the policy will not necessarily be achievable in all situations and there is a need for an element of discretion.

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

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				<p>stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<b>S163 Wairarapa Federated Farmers</b>	S163.042	General comments - regulatory policies	Oppose	<p>The proposed amendments to regulatory policies would more properly be considered in the full review of the RPS scheduled in 2024.</p> <p>Additional reasons are as set out in respect of the objectives for each topic.</p>	That the proposed amendments to Chapter 4.1 be deleted
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.032	General comments - regulatory policies	Support	Supports the chapter Introduction and table of contents.	Retain.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.027	General comments - regulatory policies	Support in part	<p>The wording of Policy FW.1 clause (b) takes away from the strength this Policy is anchored on. This could be rewritten to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.</p> <p>The clause (c) is using the word 'minimise' which does not have teeth when it comes to rules in the district plans, and their implementation. This clause caveats the land contours and extent practicable; it is unclear what triggers (rules) District Plans would have, this to be implemented.</p>	<p>Rewrite Policy FW.1 clause (b) to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.</p> <p>Use stronger wording than 'minimise' in clause (c) and ensure the policy is worded in a way that the District Plan rules which flow on from this provision can be implemented. E.g. it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation in place. Ensure the provision is workable given the topographical and geological context.</p> <p>Ensure there are stormwater-basics and bottom lines, the</p>

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				<p>Most of the land is on challenging contours in Wellington and on hills that need to be cut out for feasible development to occur. Any mitigation that might be possible for flatter regions such as, Waikato or Auckland, may not be realisable, possible, or feasible in Greater Wellington.</p> <p>The policy should acknowledge and change the wording to say, if it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place.</p> <p>In summary, the policy contradicts itself because minimising earthworks in Wellington may not be able to be an option in some instances due to topography and soil conditions.</p> <p>The drafting intent of Policy FW.1 (f) is optimistic to reflect achieving multiple gains for stormwater management. In our built / urban environments, we observe the multiple issues of our stormwater network which won't be able to achieve the intent of this Policy. The policy should ensure there are stormwater-basics and bottom lines are achieved- not compromised then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention. The policy should focus on absolute musts of stormwater management and land development and acknowledge in the absence of standards and bottom lines, delivering other aspects may be a luxury. The policy needs to ensure the stormwater system provides safe and clever solutions to our communities then the rest, multiple positive outcomes, will come.</p> <p>The policy also needs to acknowledge the need of additional infrastructure to be able to give effect to this Policy.</p>	<p>'musts of stormwater management and land development' are captured in this policy. If these are first achieved then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention.</p> <p>The policy also needs to acknowledge the need of additional infrastructure and provides for safe and cleaver solutions for communities.</p>
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.077	General comments - regulatory policies	Not Stated / Neutral	Policy 6 recognises the significance of Porirua Harbour. This could be further discussed.	Discuss in more detail the significance of Porirua Harbour.
<b>S11 Outdoor</b>	S11.013	Policy 2: Reducing	Support in part	Not stated.	Amend the explanation of Policy 2 to include: "seeks to protect neighbouring areas <b>which includes our</b>

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<b>Bliss Heather Blissett</b>		adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans			<b>natural environment, indigenous wildlife and vegetation, and peoples health from..."</b>
<b>S16 Kāpiti Coast District Council</b>	S16.031	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support	<p>Council supports the consideration of the adverse effects of discharges to air in an integrated way with GWRC responsible for the regulatory method of regional plan implementation. Council considers this is consistent with GWRC's responsibilities under section 30 of the RMA.</p> <p>Council supports the identified city and district council methods and participation, in particular the provision of information and the establishment of protocols for the management of earthworks and air quality between local authorities - however Council notes there is no requirement for the specification of non-regulatory methods in an RPS.</p>	Retain.
<b>S30 Porirua City Council</b>	S30.024	Policy 2: Reducing adverse effects of the discharge of odour, smoke,	Oppose	<p>Council supports the intent of these changes but seeks changes to improve drafting and therefore implementation by plan users. Issues of concern include:</p> <ul style="list-style-type: none"> <li>• Rules are a method, therefore this (and other policies) should read 'rules and/or other methods'.</li> <li>• 'Phase out' is an objective not a policy. Clause (d) needs to be supported through the relevant objective. If</li> </ul>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>Regional plans shall include policies, and/or rules and/or other methods that:</p> <p>(a) protect or enhance the amenity values of neighbouring areas from discharges of odour, smoke and dust; and</p> <p>(b) protect people's health from discharges of dust, smoke and</p>

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		dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans		phasing out coal by 2030 is what is sought to be achieved, then this needs to be clear within an objective.	fine particulate matter; and (c) support industry to reduce greenhouse gas emissions from industrial processes, and (d) <del>phase out by 2030, avoid the ongoing use of coal as a fuel source for domestic fires and large-scale generators by 2030.</del>
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.028	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support	Support the inclusion of greenhouses gasses and insofar as this relates to regional plans only.  Note that some of this is going further than national direction and could be difficult to achieve, and a significant burden for industrial businesses if not properly supported / funded.	Retain policy as notified but recognise that funding may be an issue.
<b>S128 Horticulture New Zealand</b>	S128.019	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse	Support in part	In the operative RPS, policy 2 is linked to Objective 1 (relating to amenity and peoples wellbeing in relation to odour, smoke and dust) and Objective 2 (human health in relation to fine particulate matter). It may be more logical to include new direction relating to greenhouse gases in standalone policy linked to the climate change objectives (e.g., Objective CC.3). It is unclear why the explanation in relation to the existing part of the policy is proposed to be deleted. The Explanation text refers to large-scale industrial boilers, rather the defined term 'large scale generators	Retain Policy 2 as per the operative RPS and include greenhouse gas emissions as a standalone policy.  AND Align the policy wording with upcoming national direction.

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		e gas emissions - regional plans			
<b>S128 Horticulture New Zealand</b>	S128.020	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support in part	Greenhouses that require heating do in some part of the country rely on coal as a fuel source. Support the direction to 'support industry to reduce greenhouse gas emissions from industrial processes' - this implies enabling actions that support transition to alternative fuels. The Emissions Reduction Plan seeks to: "Ban new low- and medium-temperature coal boilers and phase out existing ones by 2037".	Add a new subclause <b>(e) avoid new coal boilers or the use of coal as a fuel source for domestic fires and large-scale generators</b>
<b>S128 Horticulture New Zealand</b>	S128.021	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support in part	Align the policy wording with upcoming national direction.  The Emissions Reduction Plan seeks to: "Ban new low- and medium-temperature coal boilers and phase out existing ones by 2037".	Amend subclause (d) as follows: (d) phase-out coal as a fuel source for domestic fires and large-scale generators by 2030 <del>7</del> .
<b>S131 Ātiawa ki</b>	S131.046	Policy 2: Reducing	Support		Ātiawa supports the amendments to Policy 2.

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<b>Whakaron gotai Charitable Trust</b>		adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans			
<b>S133 Muaūpoko Tribal Authority</b>	S133.055	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
<b>S163 Wairarapa Federated Farmers</b>	S163.043	Policy 2: Reducing adverse effects of the discharge of odour, smoke,	Oppose	Concerned that one region adopting new regulatory settings (over and above the ETS) may result in perverse consequences (eg, activities transferring or 'leaking' to another region). Refer to submission for more detail.	That the amendments to Policy 2 be deleted



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		dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans			
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.033	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support		Retain
<b>S167 Taranaki Whānui</b>	S167.060	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse	Support	Taranaki Whānui supports the amendments to Policy 2	Retain as notified.

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		e gas emissions - regional plans			
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.020	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support in part	<p>The new addition to the policy where existing industrial and trade premise consent holders to demonstrate a reduction in GHGs at consent renewal is encouraging as well as the phasing out the coal. However, we are unsure of the policy impact on our communities especially given that the transition required is not too far (2024). Having access to a warm and dry house in most instances could mean domestic fires. It will be costly to change this overnight.</p> <p>Another question this Policy also poses is how monitoring and compliance will be performed.</p>	Some consideration could be included on implementation (monitoring and compliance) and impact on communities.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0136	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions - regional plans	Support in part	Rangitāne o Wairarapa strongly support providing policies, rules and methods to protect tangata whenua and communities from adverse health and amenity impacts from the discharges identified, as well as the phase-out of coal as a fuel source domestically and commercially. Rangitāne o Wairarapa support providing policies, rules and methods to support industry to reduce greenhouse gas emissions;	Clause (c) should be strengthened to include reference to supporting industry reductions that are consistent with national targets set to achieve the objectives of the Zero Carbon Act. Amend policy to support reductions in industrial GHG emissions that are consistent with national GHG emissions targets.
<b>S16 Kāpiti Coast</b>	S16.014	Policy CC.1:	Oppose	It is unclear to us what the policy would expect city and district councils to do through their district plans.	Delete Policy CC.1 or apply it only to regional councils.

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District Council		Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans		Considering city and district councils have no responsibilities for discharges to air, and regional councils are responsible for public transport services, we find the policy confusing and without a legislative basis on which to base it on. As a mandatory policy that city and district councils would be required to give effect to, this is particularly concerning.	
S25 Carterton District Council	S25.015	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>While CDC supports the intent of this policy, applying the requirements in (a)-(c) to all new and altered transport infrastructure does not allow for the scale or type of the alterations to be considered.</p> <p>For example, an alteration to transport infrastructure could comprise a new roundabout, or creation of a heavy vehicle bypass - there are many types of alterations where consideration of these matters would not be appropriate, either because the alteration is minor in nature, or because it provides greater efficiency for the wider transport network - but not necessarily for zero- or low- carbon modes. While there might be flow-on effects (e.g. a heavy vehicle bypass might make other urban streets more attractive for active modes), these would not necessarily meet the criteria in (b) and (c).</p> <p>CDC also requests that the policy is amended so that it applies in urban areas only.</p>	<p><i>[Amendment sought applies to Policy CC.9, Chapter 4.2]</i></p> <p>Amend the policy so that it does not apply to small-scale transport infrastructure alterations and does not apply outside urban areas.</p>
S30 Porirua City Council	S30.025	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation, and due to its drafting and scope represents a high regulatory requirement. Issues of concerns include:</p> <ul style="list-style-type: none"> <li>District plans cannot regulate how transport infrastructure is operated. The policy needs to be amended to reflect that district plans can only manage the future development, use and subdivision of land. Waka Kotahi and the Regional Transport Committee have a significant role in directing how the network is</li> </ul>	<p>Delete policy.</p> <p>Alternatively, amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and is within the scope of what can be achieved under RMA.</p> <p>Provide definitions for 'Transport infrastructure' and 'altered' If these terms are retained.</p>

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		re - district and regional plans		<p>operated through the Regional Land Transport Plan and through Waka Kotahi's National Land Transport Plan and Waka Kotahi implementation on the GPS on Transport Funding. The other mechanism to deliver these outcomes is activity management plans of road controlling authorities and public transport agencies. Noting that affordability is a big issue for councils such as Porirua City Council with a constrained rating base.</p> <ul style="list-style-type: none"> <li>• A definition is needed for "transport infrastructure". For example, is a private car parking garage on a residential property a piece of transport infrastructure?</li> <li>• This Policy applies to "all new and altered transport infrastructure" which would unnecessarily capture a very wide range of infrastructure including altered bus stops, small scale repair works, and EV charging points. There is no definition for altered and one needs to be provided to avoid unintended consequences of very small scale alterations being captured.</li> <li>• It is unclear what is meant by "optimising overall transport demand" and how district plans will help achieve this.</li> <li>• It is unclear what level of change is required to meet "maximising" mode shift and how this would be measured in the regulatory context of district plan rules.</li> <li>• It is unclear what is meant by "support". How will this be achieved in district plan rules or methods?</li> </ul>	
<p><b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b></p>	S34.025	<p>Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans</p>	Oppose	<p>Council considers that there is no legislative support for this policy, and it is not clear how district plans are expected to give effect to this policy.</p> <p>The road controlling authorities are responsible for the design, construction and operation of the transport network and regional council is responsible for public transport provision.</p> <p>There is also a scale and significance issue with this policy, particularly when it is applied to altered transport infrastructure and no threshold has been proposed. For example, many of the existing projects in Upper Hutt in the RLTP do not align with this and would be very difficult to achieve under this policy. The policy seems</p>	<p>Amend the provision to read:                      "Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans                      District and regional plans shall include objectives, policies, rules and/or methods to <b>consider how require that all</b> new and altered transport infrastructure is designed, constructed, and operated in a way that contributes to reducing greenhouse gas emissions by:                      (a) Optimising overall transportdemand;                      (b) Maximising mode shift from private vehicles to public transport or active modes; and                      (c) Supporting the move towards low and zero-carbon</p>

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

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				necessarily for zero- or low-carbon modes. While there might be flow-on effects (e.g. a heavy vehicle bypass might make other urban streets more attractive for active modes), these would not necessarily meet the criteria in (b) and (c).	
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.012	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.
<b>S115 Hutt City Council</b>	S115.027	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>District plans have limited ability to regulate how transport infrastructure is operated. District plans regulate land use and cannot generally affect how road and rail infrastructure is allocated between modes or used.</p> <p>In general, the major decisions around how transport infrastructure is designed and constructed to reduce greenhouse gas emissions are locked in when a project's broad outlines are set, and the choice is made to fund the project. By the time a project is at detailed consenting stage, it is too late to make major changes (such as route or mode). Therefore, we see more of the detailed design choices as being best achieved outside the resource management system, through:</p> <ul style="list-style-type: none"> <li>• Decisions on infrastructure investment made in the Regional Land Transport Plan (see amendments proposed to Policy 9 and new Policy EIW.1, and Action 10.1.4 in the Ministry for the Environment's Emissions Reduction Plan)</li> </ul>	Substitute new Policy CC.1 completely with: Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans District and regional plans shall include objectives, policies, and methods that only enable new transport infrastructure or significant alterations to transport infrastructure where it: (a) does not provide added transport network capacity for high-carbon passenger transport modes; and (b) to the extent possible for a project of its scale, maximises local and regional mode shift from high-carbon passenger transport modes to low and zero-carbon modes; and (c) is designed and constructed to minimise greenhouse gas emissions; and (d) can be and is intended to be operated to minimise greenhouse gas emissions

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				<p>• Mode choice decisions made by individuals in response to the incentives provided for by the NZ Emissions Trading Scheme, regional council decisions on public transport fares, etc.</p> <p>This policy retains its importance chiefly through the ability to, and the threat of, inappropriate projects having their consents declined. We therefore suggest amendments to strengthen the policy that it can realistically be used to decline inappropriate projects.</p> <p>That said, we still support the policy's direction to control the design and construction of transport infrastructure to the extent this is possible at the stage it is controlled by the resource management system.</p>	
<b>S116 Doctors for Active, Safe Transport (DAST)</b>	S116.001	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>The health of people should be explicitly stated as a rationale for mode shift (in addition to climate change). This is "tucked into" provisions very explicitly about climate change.</p> <p>We are a network of over 130 Wellington and Lower Hutt Hospital doctors advocating for the benefits of active transport. This submission is informed by our experience of Riverlink, where GWRC (as one of three applicants) approved of the worsening health outcomes that health experts said would result from further increases in motorised traffic because they were "not worse than currently expected". This is appalling.</p> <p>Protecting and improving the health of your people is central to your mandate. The link between transport and health should be explicit.</p>	Amend Policy CC.1 by addition as follows: "District and regional plans shall include objectives, policies, rules and/or methods to require that all new and altered transport infrastructure is designed, constructed, and operated in a way that contribute to reducing greenhouse gas emissions <b>and improved health outcomes</b> by:..."
<b>S116 Doctors for Active, Safe Transport (DAST)</b>	S116.002	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure	Support in part	<p>Proposals for "maximising mode shift" should be required to robustly assess options. Our experience from Riverlink was that motorised transport was subject to detailed evaluation or impacts on flow and safety. Assessment of active modes was cursory and qualitative only.</p> <p>Proposals for "maximising mode shift" should also consider the impact on the wider network. In Riverlink, improvements for motorised transport claimed benefits</p>	Amend Policies CC.9, policy EIW.1 and Policy 57 to require a robust quantitative assessment of mode shift options and consideration of impacts on the wider network.

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		re - district and regional plans		from decreased congestion, but did not assess worsening congestion elsewhere on the road network. Likewise, active transport improvements were proposed independently of, and disconnected from, the cycle network outside of the project designation.	
<b>S124 KiwiRail Holdings Limited</b>	S124.003	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Not Stated / Neutral	KiwiRail supports the new policy which requires transport infrastructure planning to consider and choose solutions that will contribute to reducing greenhouse gas emissions.	Retain as notified.
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.047	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	<p>Ātiawa have an interest in this Policy. In principle Ātiawa supports the intent of Policy CC.1 to reduce carbon emissions generated by transport.</p> <p>Ātiawa wants to ensure that maximising modal shift from private vehicles to public transport or active modes does not exacerbate existing inequalities.</p> <p>That is, ensuring accessibility for all capabilities - those who cannot easily walk or cycle, ensuring equity for Māori, and those with care-giving responsibilities. For example, it is reported 'that low-income people in some areas, consider it essential to own a car, because they have no other way to do what they need to get done in their lives. Work and other activities are not close enough to walk to; the cycling networks are not safe enough; and public transport is neither frequent nor direct for people who do not work in</p>	Ātiawa seek that the Regional Council partner with all parts of the community and mana whenua to manage transport infrastructure and planning to ensure those that faces that biggest barriers are provided for.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				the central city and live close to train lines or rapid bus routes.'	
<b>S140 Wellington City Council (WCC)</b>	S140.029	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	We support this policy but recommend that the policy can be further strengthened by: a reference to the prioritisation of various modes based on the sustainable transport hierarchy.	Add: A reference to the prioritisation of various modes based on the sustainable transport hierarchy.
<b>S142 Combined Cycle Submitters (CCS)</b>	S142.003	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support	Supports these two policies. Consider that they provide appropriately clear direction which aligns the RPS with the approach to mode shift and climate mitigation in relevant non-statutory documents and regional commitments.	Retain as notified.
<b>S144 Sustainable Wairarapa Inc</b>	S144.004	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and	Support in part	The Methods proposed under this policy -- CC.2, CC.7 and CC.10 -- don't seem up to the task of achieving the Objective CC.3.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans			
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.021	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	As set out above it may take some time to develop the strategies that are necessary to achieve zero emissions in the aviation sector. It would therefore be inappropriate if this policy were to extend to air transportation.	Amend the policy to ensure it relates to land transportation infrastructure, rather than inadvertently capturing all modes of transportation.
<b>S151 NZ Centre for Sustainable Cities</b>	S151.004	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support	Support the provisions for limiting emissions-inducing sprawl	Not stated.
<b>S163 Wairarapa Federated Farmers</b>	S163.044	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and	Oppose	Defer to the full RPS review in 2024.  Accepting the intent to optimise urban transport infrastructure, we point out that mode-shift is not a practical option in rural areas, nor for heavy vehicles. See submission for more detail.	That Policy CC.1 be deleted

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans			
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.034	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	The terms "contribute to reducing" are redundant. The key focus must be to reduce greenhouse gas emissions.	District and regional plans shall include objectives, policies, rules and/or methods to require that all new and altered transport infrastructure is designed, constructed, and operated in a way that <del>contribute to reducing</del> <b>reduces</b> greenhouse gas emissions by: (a) Optimising overall transport demand; (b) Maximising mode shift from private vehicles to public transport or active modes; and (c) Supporting the move towards low and zerocarbon modes.
<b>S166 Masterton District Council</b>	S166.042	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support in part	Agree in principle - it is being looked at in the Wairarapa Combined District Plan review. Acknowledge that targets are set as 'contributing to' the regional targets and that each district council will need to show how they contribute towards the regional target through their objectives, policies and rules i.e., when developing their objectives, policies and rules how that contributes to the overall targets. We also note that the extent that each council can contribute will differ.	Retain as notified. However: More clarity needed on what support will be provided for smaller councils to put infrastructure in place to contribute to these regional targets.
<b>S167 Taranaki Whānui</b>	S167.061	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and	Support in part	Taranaki Whānui supports the principle of new Policy CC.1 but would like to see stronger protection for lower-decile areas (including Māori).  Lower-decile areas (including Māori) have been historically disadvantaged by the public transport system.  Taranaki Whānui would like to partner and be involved in the decision-making of transport infrastructure planning.	Insert a new sub-part which ensures a focus on equity of access

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans			
<b>S16 Kāpiti Coast District Council</b>	S16.015	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>We oppose this policy and consider a non-regulatory method appropriate for encouragement of the desired outcomes.</p> <p>We consider it inappropriate to require city and district councils to develop threshold targets. Traffic volumes and decisions by individuals on whether or not to use a private vehicle, buy an electric vehicle, or use public transport are not matters that can be addressed or required via regulatory methods in a district plan. Council already requires transport assessments on developments where it is considered to be appropriate, and this often includes travel plans to address transport effects where specific transport concerns are identified. As city and district councils have no legal authority under the RMA to manage discharges to air, travel assessments are required for safety purposes rather than emissions purposes.</p> <p>We also oppose the suggested requirement for a formal plan change to give effect to this policy by June 2025. We recommend deleting policy or amending it to provide for non-regulatory methods to encourage the desired changes in travel mode.</p>	Delete policy CC.2 or amend it to require non-regulatory methods that will be explored by Greater Wellington Regional Council and city and district councils in partnership.
<b>S30 Porirua City Council</b>	S30.026	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>Council opposes this policy and seeks its deletion. The policy requirement represents a piecemeal "ambulance at the bottom of the cliff" approach. It is more effective to intervene at an earlier stage in the development process by requiring:</p> <ul style="list-style-type: none"> <li>• Regulatory land use frameworks that manage the distribution of activities across urban environments in a way that achieve Objective 3 to the NPS-UD.</li> <li>• The location of urban subdivisions together with subdivision design enable people to have a choice in transport modes.</li> <li>• Good quality urban design that ensures new developments are laid out and/or incorporate features that encourage active and public transport usage.</li> </ul> <p>The policy applies equally to "out of zone" development as much as "in-zone" development, and in so doing</p>	<p>Delete policy. OR</p> <p>Alternatively, amend policy so that it provides appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p><b>Policy CC.2: <del>Travel demand management plans</del> Increased reliance on public transport and active transport modes - district plans</b></p> <p>By 30 June 2025, district plans shall include objectives, policies and rules that:</p> <p>(a) <del>require subdivision, use and development</del></p>

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>fails to incentivise or recognise the location of developments. For example, a new office building in the Porirua Metropolitan Centre Zone is already well served by active and public transport modes yet it would be required to incur consenting costs in producing a travel demand management plan as would an "out of zone" office building in a rural zone.</p> <p>The policy also cannot address operational issues that present barriers to active and public transport usage such as ticketing policies, fares, levels of services etc. As such it alone cannot "maximise" use of public and active transport modes.</p> <p>The policy only requires that a travel demand management plan is produced. It is silent on the implementation of such plans nor what happens if the plan fails to maximise the use of public and active modes, for example due to people's preferences.</p> <p>Travel demand management plans are just a type of method to implement the policy and should be deleted from the policy. Rather, the policy needs to be reframed to provide direction on increasing the use of public transport and active modes.</p>	<p><del>consent applicants to provide travel demand management plans to minimise reliance on private vehicles and</del> maximise use of public transport and active modes for all new subdivision, use and development <del>over a specified development threshold</del> where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions; and <b>(b) minimise reliance on private vehicles.</b></p>
<p><b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b></p>	<p>S34.026</p>	<p>Policy CC.2: Travel demand management plans - district plans</p>	<p>Oppose</p>	<p>Council opposes the inclusion of arbitrary timescales and requirements on territorial authorities. The regional council not in a position to mandate this, particularly in a residential context. It is not considered that this is sufficiently evidenced, nor an appropriate RMA tool that is supported by legislation or a higher order document.</p> <p>The provision, and the deadline imposed by it, places an undue resource burden on territorial authorities to identify these thresholds and a definition of "more than minor" with respect to different parts of the local transport network and for different sites.</p> <p>A threshold in an area with known capacity issues, would be lower than where sufficient capacity exists. It also does not account for differences in site location and development typology.</p>	<p>Delete provision or amend provision to read:  <del>"By 30 June 2025, d</del>District plans shall include objectives, policies and rules that <del>require subdivision, use and development consent applicants to</del> <b>consider provide</b> travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for <del>all</del> new subdivision, use and development <b>where there are known capacity issues over a specified development threshold. where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions."</b></p>

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				<p>It would be unrealistic to reflect these differences in a rule and is unnecessary given that district plans contain provisions to address adverse effects, which include effects on the transport network.</p> <p>By making this a regulatory method - GWRC creates additional regulatory debate for each territorial authority with our communities, and places additional consent burdens on each plan, likely limiting development in the process which is at odds with our housing needs and the intentions of the NPS-UD.</p>	
<b>S64 Rachel Bolstad</b>	S64.001	Policy CC.2: Travel demand management plans - district plans	Support in part	Support all councils ensuring that more homes doesn't mean more emissions. At this time of climate crisis, must keep a clear focus on massively reducing travel emissions by enabling more active transport, public transport, and giving people safe and accessible low-emissions mobility options for their day to day lives.	Request a new Policy CC.2A which requires new subdivisions/developments to have a Travel Demand Management Plan (TDM) and/or additional or different policy tools that ensures developments aren't private car-centric and proves they will not lead to huge growth in private vehicle driving. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
<b>S77 James Burgess</b>	S77.003	Policy CC.2: Travel demand management plans - district plans	Support	Supports Policy CC.2 that introduces travel demand management plans. The thresholds for their use should be as low as possible so that they are used wherever they can have an impact.	Retain as notified.
<b>S79 South Wairarapa District Council</b>	S79.019	Policy CC.2: Travel demand management plans - district plans	Support in part	<p>It is unclear how the large network of rural transport infrastructure in the rural environment can be amended to achieve the outcomes sought.</p> <p>It is unclear on a regional scale what a 'more than minor' increase would be.</p> <p>The objective requires the support of an amended and detailed transport network assessment and strategy that sets out realistic, specific and specific implementable options for applicants to incorporate into their development.</p>	Amend Policy CC. 2 as follows: <del>By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in</del>

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					<p><del>greenhouse gas emissions</del>, <b>regional and subregional transport strategies are developed and adopted that set out network wide, mode and location specific strategic development actions and requirements for all new subdivision, use and development to:</b>(a) Identify appropriate thresholds for require travel demand management plan to give effect to this policy; and(b) minimise reliance on private vehicles, and;(c) maximise use of public transport and active modes, and;(d) avoid more than minor increases in greenhouse gas emissions, and;(e) require district plans are amended to include objectives, policies and rules that require subdivision, use and development consent applicants to implement the requirements in (a) to (d) above.</p>
<p><b>S94 Guardians of the Bays Incorporated</b></p>	<p>S94.008</p>	<p>Policy CC.2: Travel demand management plans - district plans</p>	<p>Support</p>	<p>Not stated</p>	<p>Retain as notified</p>
<p><b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b></p>	<p>S102.013</p>	<p>Policy CC.2: Travel demand management plans - district plans</p>	<p>Support</p>	<p>Generally supports regulatory policies in the 'Climate Change' chapter.</p>	<p>Retain as notified.</p>

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<b>S115 Hutt City Council</b>	S115.028	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>Travel demand management plans are only one tool for achieving travel demand management and driving mode shift. For small developments, developments without parking, or developments in zones already identified as well-located suitable for denser development, they are generally impractical or disproportionately burdensome.</p> <p>We request the policy be deleted, and district plans and resource consent decisions decide what situations would require travel demand management plans as well as the threshold of scale to be applied.</p>	Delete new Policy CC.2
<b>S118 Peka Peka Farm Limited</b>	S118.005	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>Concerned that Policy CC.2 creates uncertainty by shifting this requirement to district plan level, leaving the potential for individual district plans to set potentially varying thresholds. The use of 'more than minor' is open to interpretation and therefore creates additional uncertainty of application. Also concerned at the difficulty in ongoing monitoring and enforcement that this policy will create.</p>	Delete Policy CC.2.
<b>S119 Summerson Group Holdings Limited</b>	S119.001	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>Policy CC.2 creates uncertainty by shifting this requirement to district plan level, leaving the potential for individual district plans to set potentially varying thresholds. There is also uncertainty created through the use of 'more than minor' and related to the ongoing monitoring and enforcement of travel demand management plans.</p>	Delete Policy CC.2.
<b>S120 The Retirement Villages Association of New Zealand</b>	S120.001	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>Policy CC.2 creates uncertainty by shifting this requirement to district plan level, leaving the potential for individual district plans to set potentially varying thresholds. There is also uncertainty created through the use of 'more than minor' and related to the ongoing monitoring and enforcement of travel demand management plans.</p>	Delete Policy CC.2.
<b>S129 Waka Kotahi NZ Transport Agency</b>	S129.007	Policy CC.2: Travel demand management plans -	Support	<p>Supports the direction to District Councils to consider travel demand management plans to identify trip generation and provide opportunities to address Vehicle Kilometres Travelled (VKT).</p>	Retain as notified.



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		district plans			
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.048	Policy CC.2: Travel demand management plans - district plans	Support	In principle Ātiawa supports Policy CC.2.	Retain as notified.
<b>S133 Muaūpoko Tribal Authority</b>	S133.035	Policy CC.2: Travel demand management plans - district plans	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
<b>S135 Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/Stebbing's Farmlands Ltd</b>	S135.003	Policy CC.2: Travel demand management plans - district plans	Oppose	<p>This policy is excessive and represents an additional cost to development and the achievement of other objectives set out under Chapter 3.9 that seek to provide for an increase in housing supply. It is unrealistic to expect a developer to implement a plan that is reliant on the purchasers of private property to minimise or reduce private vehicle use, and to increase their use of public transport. The new policy is also very unclear as to what the 'specified development threshold' will be therefore the policy is ambiguous and confusing.</p> <p>Overall, requiring Travel Demand Management Plans in District Plans will be ineffective and impossible to enforce; and that efforts to curb carbon in Wellington should focus on incentivising electric car and public transport use through subsidies.</p>	Delete Policy CC.2
<b>S140 Wellington City Council (WCC)</b>	S140.030	Policy CC.2: Travel demand management plans -	Support in part	At a high level WCC supports provisions which will discourage vehicular generating activities in greenfield areas, and in areas not close to public transport and employment. A major concern is that the lack of specificity will lead to inconsistencies in the approach across the region and	Delete policy CC.2 and the integrate the Policy into the Regional Land Transport Plan. Or Amend Policy CC.2 to be a consideration policy with clearer direction on the outcomes being sought.

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		district plans		create tension between the intended outcome of this policy and the practical implementation carried out by Territorial Authorities. Additionally, when looking at the definition of a 'travel demand management plan', the policy will likely result in the consideration of the individual development only, which has the risk of ignoring region-wide pressures. Policy CC.2 also reads as being more appropriate as a consideration policy, where having a more flexible approach is enabled and can be utilised more effectively by a Territorial Authority.	
<b>S141 Generation Zero Wellington</b>	S141.005	Policy CC.2: Travel demand management plans - district plans	Support	Recognise that greater density is not a silver bullet, and employing greater density doesn't preclude the creation of new greenfield developments. Supports the introduction of the requirement for these developments to present a Travel Demand Management (TDM) plan and believe this is a good and crucial step to ensuring that any of these new developments are founded around principles of sustainable mobility. These plans will help to ensure that future generations are not locked into the car-centric design philosophies that are currently commonplace.	Retain as notified.
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.022	Policy CC.2: Travel demand management plans - district plans	Oppose in part	WIAL is actively involved in initiatives such as the Let's Get Wellington Moving programme to improve connectivity between the airport and key nodes and realise the potential to shift to more sustainable travel modes. This seeks to deliver a 'whole of system' approach that encompasses a range of measures which work together to improve transport access and associated levels of service as well as increasing sustainability. Against this background, WIAL seeks that policy such as CC.2 would not inadvertently require the airport to prepare individual travel demand management plans for each development or new facility located at the airport.	Amend this policy to clarify and therefore ensure that this policy does not apply to development associated with Wellington International Airport.
<b>S151 NZ Centre for Sustainable Cities</b>	S151.006	Policy CC.2: Travel demand management plans -	Support	Support Policy CC.2 that would provide that developers wanting to build a subdivision on the outskirts of the region would have to demonstrate no increase in emissions - whether through the building of the houses and associated infrastructure or by creating heavy car	Not stated.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		district plans		dependency among its residents - before being granted consents.	
<b>S158 Kāinga Ora Homes and Communities</b>	S158.013	Policy CC.2: Travel demand management plans - district plans	Oppose	Opposes the requirements for subdivision, use and development consent applicants to provide travel demand management plans. Considers that travel management is better undertaken at a neighbourhood scale and that they are prepared by councils rather than applicants.	Delete the policy in its entirety.
<b>S162 Winstone Aggregates</b>	S162.036	Policy CC.2: Travel demand management plans - district plans	Not Stated / Neutral	Winstone is neutral on the intent of this policy, however suggests that these plans recognise that quarrying must locate where there is accessible resource, and that aggregate providers have very little control over where its customers seek to transport the aggregate to once it leaves the gate. Development/Construction activities seeking consent should be encouraged to source materials from local aggregate source in an effort to reduce their emissions.	Exclude quarrying activities from the requirement to provide travel demand management plans.
<b>S163 Wairarapa Federated Farmers</b>	S163.045	Policy CC.2: Travel demand management plans - district plans	Oppose	Defer to the full RPS review in 2024.  Accepting the intent to optimise urban transport infrastructure, we point out that mode-shift is not a practical option in rural areas, nor for heavy vehicles. See submission for more detail.	That Policy CC.2 be deleted.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.035	Policy CC.2: Travel demand management plans - district plans	Support in part	The requirement for travel demand management plans is supported. However, do not support the use of a threshold to trigger the requirement for such plans. It is unclear how "more than minor" will be determined in the context of greenhouse gas emissions whereby an individual's or group of individuals' emissions may be minor but nonetheless contribute cumulatively.	Delete the inclusion of a specified development threshold as follows: By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development. <del>over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions.</del>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S166 Masterton District Council</b>	S166.043	Policy CC.2: Travel demand management plans - district plans	Support	Note that the travel management plans need to be reflected in our Wairarapa Combined District Plans by June 2025.	Retain as notified.
<b>S167 Taranaki Whānui</b>	S167.062	Policy CC.2: Travel demand management plans - district plans	Support	Taranaki Whānui supports new Policy CC.2	Retain as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.041	Policy CC.2: Travel demand management plans - district plans	Not Stated / Neutral	<p>The policy intent of asking territorial authorities to prepare travel demand management plans is unclear. What does preparing travel demand management plans look like and whether this distracts the local authorities to execute zero carbon policies? Because producing such plans will take time, resources and requires robust evidence.</p> <p>It is unclear also whether producing these plans will bear any additional costs to communities and whether this can be done in a more efficient way through a resource consent application.</p> <p>It is unclear, the word 'minimising' in the policy refers to District Plan minimising the reliance on private vehicles, or developers are required to prepare travel management plans so that they can provide a plan on how their development promotes and enables a zero carbon travel framework.</p>	Amend the provision to make it clearer that consent applicants are responsible for the preparation of travel demand management plans. Clarify the content and purpose of these plans.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0115	Policy CC.2: Travel demand management plans -	Support	Rangitāne o Wairarapa support the requirement to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold. Trigger threshold will need to be carefully considered to ensure the effectiveness of the policy in	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		district plans		reducing GHG emissions and guidelines comprehensive to ensure a wide range of options are considered in travel demand management plans to maximise up-take zero and low carbon transport modes.	
<b>S16 Kāpiti Coast District Council</b>	S16.016	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Oppose	<p>Council opposes this policy on the basis it is unclear how district plans would enable a shift to low and zero-carbon emission transport. Council notes district plans do not contain provisions that specify what transportation or infrastructure types must be adopted, nor do they include provisions that would prevent a shift to low and zero-carbon emission transport.</p> <p>Council considers non-district plan methods would be more efficient and effective at achieving the stated objective, such as GWRC input into Council strategies and plans prepared under the Local Government Act that manage infrastructure such as roads and public spaces. The section 32 does not appear to explore these options. GWRC could also influence the funding and timing of the delivery of projects that may help achieve the stated objective via the Long Term Plan and Annual Plan processes. We consider if such an approach had been carefully considered in the section 32 evaluation report, Policy CC.3 would not have been included in the plan change.</p> <p>As a proposed mandatory policy that city and district councils would be required to give effect to, this policy is particularly concerning to Council.</p>	Delete or amend to clearly specify how district plans could enable the desired shift to low and zero-carbon emission transport.
<b>S25 Carterton District Council</b>	S25.016	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	CDC supports this policy and particularly the 'enable' approach to encourage zero- and low-carbon transport infrastructure.	Retain this policy.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S30 Porirua City Council</b>	S30.027	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Oppose	<p>Council supports the intent of this policy and has already attempted to enable multi-modal transport through the Infrastructure Chapter in our Proposed District Plan.</p> <p>However, it is also not clear what infrastructure is included in this policy. For example, new roads and multi-lane state highways would support the use of electric vehicles. It is unclear if the intention is for these to be enabled in district plans.</p> <p>To implement the policy, a definition of zero and low-carbon multi-modal transport is required, with inclusions.</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives. Define 'zero and low-carbon multi-modal transport', with inclusions.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.027	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Oppose	<p>Support intent but oppose provision as written and the inclusion of arbitrary timescales. Public transport relates to a range of vehicles, and it is not appropriate, for example, to provide for rail infrastructure to be a permitted activity when other environmental effects could be significant.</p> <p>Transport is the responsibility of the road controlling authority and district plans do not prevent the provision of such infrastructure.</p> <p>Most of this will be on public land which will be covered by other processes e.g., bylaws.</p> <p>Council notes, it is unclear how can district plans can support EV charging when all parking standards were required to be removed under the NPS-UD.</p>	Delete policy in its entirety or amend to delete timescale and provide clarity on how this can be achieved.
<b>S79 South Wairarapa District Council</b>	S79.020	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	<p>The use of the policy to enable infrastructure is supported. It is unclear why this requirement does not extend to regional plans as substantial changes to transport infrastructure is likely to require a multitude of resource consent approvals.</p>	Amend Policy CC.3 to include regional plans.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.014	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.
<b>S113 Wellington Water</b>	S113.012	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	Include a clause that District Plans will also enable infrastructure that gives effect to Te Mana o te Wai, or make suitable provision for this elsewhere in the RPS.	Amend the Policy as follows: By 30 June 2025, district plans shall include objectives, policies, rules and methods that enable infrastructure that: <b>(a)</b> supports the uptake of zero and low-carbon multi modal transport that contribute to reducing greenhouse gas emissions <b>and/or(b) Gives effect to Te Mana o te Wai.</b> OR Amend another policy or introduce a separate policy (whichever is the most appropriate), to achieve the same policy outcome as the amendment proposed above.
<b>S115 Hutt City Council</b>	S115.029	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	Support, but a definition for "zero and low-carbon multi-modal transport" needs to be provided.	<ul style="list-style-type: none"> <li>Retain Policy CC.3</li> <li>Include a definition for 'zero and low- carbon multi-modal transport'.</li> </ul>
<b>S124 KiwiRail Holdings Limited</b>	S124.004	Policy CC.3: Enabling a shift to low and zero-carbon	Support	KiwiRail supports the new policy which requires district plans to provide a supportive planning framework (for example, permitted activity status) for zero and low-carbon multi modal transport infrastructure, such as public transport infrastructure.	Retain as notified

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		emission transport - district plans			
<b>S129 Waka Kotahi NZ Transport Agency</b>	S129.008	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	Supports this intention to enable mode shift.	Retain as notified.
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.049	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	In principle Ātiawa supports Policy CC.3.	Retain as notified.
<b>S133 Muaūpoko Tribal Authority</b>	S133.036	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	MTA supports requirements to reduce emissions and improve health and resilience while supporting people and communities.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
<b>S135 Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/Stebbing</b>	S135.004	Policy CC.3: Enabling a shift to low and zero-carbon emission transport -	Oppose	Do not consider a specific policy in the RPS is necessary to support the uptake of zero and low-carbon multi-modal transport infrastructure such as cycle-ways and EV charging network. This is because the market is driving this change in any event and requiring district plans to include objectives, policies and rules is not considered necessary to enable this shift.	Delete Policy CC.3



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Farmlands Ltd</b>		district plans			
<b>S140 Wellington City Council (WCC)</b>	S140.031	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	The policy statement should focus on "zero-carbon" emission transport. Given that it is a policy to enable mode shift, the use of low-emission transport is a "given" as part of the transition. There are also more modes of low-emission transport that have not been identified.	Amend Policy to have a focus on "zero-carbon" emission transport and expand the types of active transport modes
<b>S151 NZ Centre for Sustainable Cities</b>	S151.007	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	Support enabling a shift to low- and zero-carbon emissions transport - district plans	Not stated.
<b>S158 Kāinga Ora Homes and Communities</b>	S158.014	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	Supports the intent of the policy, however concerned that the policy places significant burden on district councils to enable a shift to low and zero-carbon emission transport infrastructure in a very short period. Whilst district plans can include enabling objectives, policies and rules to support the policy's intent, there are a number of factors that would hinge on the development of such transport options, including that councils only have jurisdiction over new development, often other reasons of resource consent are triggered such as earthworks, vegetation clearance and structures.	Amend the policy and explanation as follows: By 30 June 2025, district plans shall include objectives, policies, rules and methods that <b>promote the construction of multi modal transport enable infrastructure that supports the reduction in greenhouse gas emissions for multi modal transport that contribute to reducing greenhouse gas emissions.</b> Explanation District plans must provide a supportive planning framework (for example, supportive objectives and policies permitted activity status) for the reduction in greenhouse gas emissions zero and low-carbon for multi modal transport infrastructure, such as public transport infrastructure, cycleways and public

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					EVcharging network.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.036	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	Seek amendment to clarify to focus is on reducing greenhouse gas emissions. Also seek amendment to ensure that the enabling of infrastructure does not cause adverse effects for indigenous biodiversity.	Amend as follows: By 30 June 2025, district plans shall include objectives, policies, rules and methods that enables infrastructure that supports the uptake of zero and low-carbon multi modal transport <del>that contribute to reducing</del> <b>reduce</b> greenhouse gas emissions, <b>while protecting indigenous biodiversity.</b>
<b>S167 Taranaki Whānui</b>	S167.063	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support	Taranaki Whānui supports new Policy CC.3	Retain as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.042	Policy CC.3: Enabling a shift to low and zero-carbon emission transport - district plans	Support in part	Policy CC.3 Environmental integration in urban development -district plans  The policy intention is supported however, the policy wording 'ensure' is not strong enough directing district plans to integrate environment in urban development. This policy could give stronger direction to District Councils that the policy is implemented in rules and standards.	Amend the word 'ensure' to provide stronger direction to District Councils.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0117	Policy CC.3: Enabling a shift to low and zero-carbon emission transport -	Support	Rangitāne o Wairarapa support the enabling of infrastructure that supports the uptake of zero and low carbon multi-modal transport, that contributes to reducing GHG emissions through district plans. Requiring consideration of transport demand optimisation, and maximising transport mode shift away from private vehicles in planning decisions is also supported.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		district plans			
<b>S16 Kāpiti Coast District Council</b>	S16.017	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	This policy is unnecessary as it merely summarises other policies proposed by RPS Change 1. It also links with Policy CC.14 which we strongly oppose and seek its deletion in our submission below	Delete Policy CC.4.
<b>S25 Carterton District Council</b>	S25.017	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	CDC supports the intent of this policy but considers that referring to both 'urban areas' and 'urban environments' makes the application of the policy ambiguous. Amendments are suggested so that it refers to 'urban areas' only.	<p><i>[Note: below is a C+P of submitters amendments, this does not align with their reasoning which sought the replacement of 'urban environments' with 'urban areas']</i></p> <p>Amend as follows:<i>Policy CC.4: Climate resilient urban areas -district and regional plansDistrict and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.ExplanationPolicy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. For the purposes of this policy, climate-resilient urban areas mean urban environments that have the ability to withstand:</i></p> <ul style="list-style-type: none"> <li><i>• Increased temperatures and urban heat island</i></li> <li><i>• Increased intensity of rainfall and urban flooding</i></li> <li><i>• Droughts and urban water scarcity and security</i></li> <li><i>• Increased intensity of wind, cold spells, landslides, fire, and air pollution</i></li> </ul> <p>The policy is directly associated with Policy CC.14 which provides further direction on actions and initiatives</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<i>to provide for climate resilient urban areas. It is noted that other policies of this RPS also provide for actions and initiatives to deliver climate resilient urban areas, including Policy FW.3.</i>
<b>S30 Porirua City Council</b>	S30.028	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	<p>The policy is implemented by another policy it refers to. It needs to be clearer to the exact actions to be undertaken.</p> <p>The policy relies on an understanding of what a climate-resilient* urban area is (which is not currently identified in the RPS) and has the effect of elevating Policy CC.14 from a "consider" policy to a "shall" policy without the necessary level of justification.</p> <p>While the explanation to the policy sets out what is intended by a climate-resilient urban area, this description is unclear and lacks the necessary certainty for regulatory controls in RMA plans. For example, it is unclear what is meant by "withstand" as used in this context, it is also unclear how is this to be measured and how will we know when we have created urban environments that can withstand the conditions listed in the explanation. It also assumes that all tools and levers are in RMA plans and fails to identify the role of other tools which lie outside of the control of RMA plans, such as:</p> <ul style="list-style-type: none"> <li>• the Building Code;</li> <li>• three water policies under the new Three Water entities; and</li> <li>• management of public spaces such as transport corridors, parks and reserves, and the DOC estate.</li> </ul> <p>The policy should be drafted in way that recognises that RMA plans can contribute to achieving climate-resilient urban areas, but they alone cannot achieve them.</p> <p>*Resilient is used 55 times in Proposed Change 1 document and resilience is used 51 times. No definition is provided for these terms. It is important that terms</p>	<p>Delete policy. OR Alternatively, amend policy so that it provides clear and appropriate direction to plan users in line with objectives.</p> <p>Define 'resilient' and 'climate-resilient'.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				intended to directly determine regulatory frameworks in regional plans and district plans are rigorously developed and understood, and properly explained and/or provided with a definition in the RPS.	
<p><b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b></p>	S34.009	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose in part	<p>Council supports the intent to enable climate resilient urban areas, however, it is considered inappropriate for RPS to direct many of the measures identified to achieve this in Policy CC.14.</p> <p>It is unclear what is meant by "the ability to withstand" the factors identified. This is not consistent with terminology in the RMA and the policy ignores the fact that provisions in district plans alone cannot achieve this policy. There is no evidence to support what level of intensity of these hazards should be provided for nor recognition that other methods such as the three waters reform and the Building Act are relevant to the ability to achieve this policy.</p> <p>The policy fails to acknowledge that the desire to create climate resilience urban areas, will inevitably require the support of hard infrastructure alongside nature-based solutions.</p> <p>The explanation for Policy CC.4 also appears to provide direction / identifies factors that need to be addressed that more appropriately sit within a policy, rather than the reasoning for the policy. As explanatory text Council is concerned that this would not have been through a sufficient Section 32 assessment.</p> <p>It is also considered problematic to cross reference both specifically and generally to another provision that is relevant in interpreting another policy.</p> <p>The relief sought by Council is more consistent with the issues identified in the RPSPC1, provides territorial authorities flexibility to address specific issues in their areas.</p> <p>The relief sought by Council also allows recognition</p>	<p>Delete the policy, or amend policy to read:          "District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas." <del>by including provisions to address: providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments. • the effects of increasing temperatures; and urban heat island; • increasing intensity of rainfall and urban flooding; • Droughts and urban water scarcity and security; • Increased intensity of wind, cold spells, landslides, fire, and air pollution • natural hazards; and • water security</del> by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments."</p> <p>Explanation          Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. <del>For the purposes of this policy, climate resilient urban areas mean urban environments that have the ability to withstand: • Increased temperatures and urban heat island • Increased intensity of rainfall and urban flooding • Droughts and urban water scarcity and security • Increased intensity of wind, cold spells, landslides, fire, and air pollution</del></p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				that there are limits to the practicality in urban areas of measures to address drought and urban water scarcity, such as off grid water sources.	
<b>S63 Mary Beth Taylor</b>	S63.014	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Municipal swimming pools must have storm water collection and storage facility, in ground, under car parks to be used to fill the pool or as emergency water supply. Municipal swimming pools must also have roof top solar energy generation and/or solar hot water heating to reduce the high energy use for heating the water.	Amend policy to require municipal swimming pools to have storm water collection and storage facilities (in ground), and under car parks and rooftop solar energy generation and/or solar hot water heating.
<b>S78 Beef + Lamb New Zealand Limited</b>	S78.007	Policy CC.4: Climate resilient urban areas - district and regional plans	Not Stated / Neutral	Accepts that Policy CC.4 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified
<b>S79 South Wairarapa District Council</b>	S79.021	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose in part	<p>Submission relates to Policy CC.4. The purpose of the policy is unclear. The policy refers to matters that are included for a Freshwater Planning Process, but is not of itself considered part of it. This is confusing and will complicate the hearing process. It is arguable that parts of CC.14 do not either directly or indirectly relate to freshwater matters contained in the NSP FM and therefore should be open to the standard schedule 1 process.</p> <p>While noting TA's functions in s.31 (b)(i), construction standards of buildings is a matter appropriately and adequately managed by the Building Act.</p>	<p>Amend Policy CC4 so that matters in CC.14(a) and (d) are directly referenced in the policy so that they need not be repeated in CC.14 and are within the scope of a schedule 1 hearing process.</p> <p>District and regional plans shall include policies, rules and/or non-regulatory methods to provide for climate- resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments <b>including:(a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050,(b) the application of water sensitive urban design principles to integrate natural water systems</b></p>

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					<p><b>into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality(c) protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural hazards and the effects of climate change</b></p> <p>[End of amendments to Policy CC.4] Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.</p>
<b>S95 Tony Chad</b>	S95.014	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Municipal swimming pools must have storm water collection and storage facility, in ground, under car parks to be used to fill the pool or as emergency water supply.	Amend policy to require storm water collection and storage facilities (in ground), and under car parks to be used to fill municipal swimming pools or as emergency water supply.
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.015	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.
<b>S113 Wellington Water</b>	S113.013	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	The drafting is convoluted and should be simplified.	Amend the Policy as follows: District and regional plans shall include policies, rules and/or methods to <del>provide for</del> <b>achieve</b> climate-resilient urban areas by <b>enabling and promoting/encouraging the</b> <del>providing for</del> actions and initiatives described in Policy CC.14 <del>which support delivering the</del>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<del>characteristics and qualities of well-functioning urban environments.</del>
<b>S115 Hutt City Council</b>	S115.030	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	This policy is not sufficiently clear for policy statement users to understand what is required.	Delete Policy CC.4.
<b>S118 Peka Peka Farm Limited</b>	S118.006	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Supports the matters listed in Policy CC.14, linking those to a well-functioning urban environment broadens that existing definition as set out in Policy 1 of the NPS-UD, however seeks that this linkage be removed from the policy.	Amend Policy CC.4 as follows: "Policy CC.4 Climate resilient urban areas - district and regional plans (FPP) District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 <del>which support delivering the characteristics and qualities of well-functioning urban environments.</del> "
<b>S119 Summerseat Group Holdings Limited</b>	S119.002	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Policy CC.14 lists a range of actions that will contribute to climate resilient urban areas. Linking those to a well-functioning urban environment broadens that existing definition as set out in Policy 1 of the NPS-UD and is not required.	Amend Policy CC.4 as follows: Policy CC.4 Climate resilient urban areas - district and regional plans (FPP) District and regional plans shall include policies, rules and/or methods to provide for climate resilient urban areas by providing for actions and initiatives described in Policy CC.14 <del>which support delivering the characteristics and qualities of well-functioning urban environments.</del>
<b>S120 The Retirement Villages Association of New Zealand</b>	S120.002	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Policy CC.14 lists a range of actions that will contribute to climate resilient urban areas. Linking those to a well-functioning urban environment broadens that existing definition as set out in Policy 1 of the NPS-UD and is not required.	Amend Policy CC.4 as follows: Policy CC.4 Climate resilient urban areas - district and regional plans (FPP) District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 <del>which support delivering the characteristics and qualities of well-functioning urban environments.</del>



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.050	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided. We also support a proactive approach to responding to climate change including managed retreat and increased restrictions on development in high prone flood areas. In line with this, we also support the identification of future new town centres that are removed from flood and liquefaction risk.	Retain as notified.
<b>S132 Toka Tu Ake EQC</b>	S132.005	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	It is important that district councils effectively manage natural hazard risks and the effects of climate change in implementing the recent NPS-UD. As such it would be helpful for the RPS to include guidance on how to implement climate and natural hazard resilience in urban areas.	Strengthen, especially regards areas intensified through the NPS-UD. As "climate resilient urban areas" is defined as urban environments which have the ability to withstand the impacts of increased natural hazards due to the impact of climate change, this should be explicitly worded in the policy.
<b>S133 Muaūpoko Tribal Authority</b>	S133.037	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
<b>S135 Best Farm Ltd/Hunters Hill Ltd/Lincolnshire</b>	S135.005	Policy CC.4: Climate resilient urban areas -	Oppose	Not convinced that this very high level policy and the outcomes described in the explanation will be able to be implemented at a local level i.e. through subdivisions. The requirement for TA's to have objectives/policies and rules is a very broad 'catch-all' wish-list for which no amount of conditions on a	Delete Policy CC.4

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Farm Ltd/ Stebbing Farmlands Ltd		district and regional plans		subdivision could achieve. It's simply not practical or achievable and whilst it is a noble attempt to solve the climate crisis, there is only some much resource and ability for TA's to implement and achieve the outcomes sought by this policy.	
S137 Greater Wellington Regional Council (GWRC)	S137.030	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section <b>Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.</b>
S140 Wellington City Council (WCC)	S140.032	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	At a high level WCC supports the intent of this policy. This policy is not sufficiently clear for policy statement users to understand what is required. Policy direction is unclear as to what the RPS is intending, particularly as resilience in relation to climate change is not defined in the RPS. The Explanation reads as policy direction rather than a requirement to provide additional information and should be included in the main section of the policy.	Amend to clarify and refine policy Amend Policy to include a portion of the explanation in the Policy section. District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments. <del>Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas.</del> For the purposes of this policy, climate-resilient urban areas mean urban environments that have the ability to withstand: <ul style="list-style-type: none"> <li>• Increased temperatures and urban heat island</li> <li>• Increased intensity of rainfall and urban flooding</li> <li>• Droughts and urban water scarcity and security</li> <li>• Increased intensity of wind, cold spells, landslides, fire, and air pollution</li> </ul> Explanation <b>The policy is directly associated with Policy CC.14 which provides further direction on actions and initiatives to provide for climate resilient urban areas.</b> It is noted that other policies of this RPS also provide for actions and initiatives to deliver climate resilient urban areas, including <b>Policy</b>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<b>FW.3</b>
<b>S144 Sustainable Wairarapa Inc</b>	S144.029	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	See Policy 57. Especially Method UD1: incorporate climate resilience into development manuals and urban design guides.	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.049	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified.
<b>S158 Kāinga Ora Homes and Communities</b>	S158.015	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Considers that this policy can be combined with Policy CC.14 rather than referring to Policy CC.14 within the policy itself.	Amend and combine Policy CC.4 with Policy CC.14.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.037	Policy CC.4: Climate resilient urban areas - district and regional plans	Support	This initiative is appropriate.	Retain.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S166 Masterton District Council</b>	S166.044	Policy CC.4: Climate resilient urban areas - district and regional plans	Not Stated / Neutral	Policy CC.4 is difficult to implement as a Tier 3 authority. There needs to be equity across the region in this approach.	Clarifications. Need clarification between Tier 1 and Tier 3 obligations
<b>S167 Taranaki Whānui</b>	S167.064	Policy CC.4: Climate resilient urban areas - district and regional plans	Support in part	Taranaki Whānui supports the principle of new Policy CC.4 but suggests specific cross reference to Policy CC.17 to ensure alignment with mana whenua values.	Retain as notified.
<b>S16 Kāpiti Coast District Council</b>	S16.018	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	We support the policy on the basis it is delivering on a legislative requirement GWRC is responsible for, and no unjustified requirements are proposed for city and district councils.	Retain.
<b>S25 Carterton District Council</b>	S25.018	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	While no methods are included, and the policy applies to regional plans only, this policy appears to set the initial framework for RMA plans targeting agricultural emissions. CDC is concerned with the implications of this, and with the interaction or conflict it might have with other agricultural emission reduction measures. Land use management largely sits with district plans, and therefore it is unclear why this only applies to regional plans, and what flow-on effects there might be for district plans.  CDC wishes to understand how this reduction aligns with Government policy in the area. It is unclear how	Delete the policy.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>fair and reasonable reductions should be calculated and consistently applied in consenting.</p> <p>CDC requests that this policy is deleted, and the matter reconsidered as part of any future plan change process if that is appropriate.</p>	
<p><b>S30 Porirua City Council</b></p>	<p>S30.029</p>	<p>Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan</p>	<p>Oppose</p>	<p>It is unclear why this policy is just focused on avoiding increased emissions, rather than seeking a reduction. If agriculture makes up 34% of greenhouse gas emissions it is not possible to achieve Objective CC.3 without a significant reduction in emissions from this sector.</p> <p>Further, it is not clear why there is a different treatment for agriculture than urban development. This seems inequitable and contrary to the objective CC.2 that seeks that the costs and benefits are shared equally and fairly across the region.</p> <p>The explanation refers to central government taking a lead in emissions reduction through the Emissions Trading Scheme (ETS). Notwithstanding that agriculture is not currently subject to the ETS, the same argument could be made for achieving modal shift in urban environments as the ETS does already apply to petroleum. Explanation outlines that this is a minimum backstop for agricultural emissions. If that is the purpose of these policies, then should that not also apply to transport? Other national directives provide the true levers, and the policy simply provides a backstop of the absolute minimum.</p>	<p>Amend policy so that it provides an equitable approach for sectors in achieving greenhouse gas emissions targets in line with the objectives.</p>
<p><b>S31 Robert Anker</b></p>	<p>S31.016</p>	<p>Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan</p>	<p>Not Stated / Neutral</p>	<p>There are many situations where a change in agricultural practice will result in both an increase and a decrease in emissions. The focus should be on the net change and not focus on only one side of the equation.</p>	<p>Amend the policy to read: Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan Regional plans shall include objective, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in <b>gross net</b> greenhouse gas emissions from agriculture.</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.036	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose in part	<p>There is no clear evidence that this is a particular issue in the Wellington Region compared to other regions where agricultural emissions are much higher, for example Waikato where the percentage of emissions from agriculture is over 50% according to Stats.NZ regional emissions data.</p> <p>This policy is identified as a regional function, but method CC.8 (d) (non- regulatory) appears to imply the requirement of farm plans through a resource consent process. The scale and thresholds for farm plan requirements are unclear and it does not appear scale has been considered.</p> <p>There are many minor changes to land use, or between agricultural activities where the public would be required to undergo an assessment to determine greenhouse gas emissions as a result of this policy. This places an unnecessary burden on the consents and applications. This is likely to disincentivise positive changes in land and be counterproductive to the aim of the objective.</p> <p>Council does not consider it appropriate to require landowners to go through a form of consent for a land use change which may be positive.</p> <p>It is noted that work is the Emissions Trading Scheme does not yet cover agriculture and that this does not address land use changes that would traditionally appear to have a greater possibility of emissions, but these could be remedied.</p> <p>There is no definition of what these activities might be or what tools are available to remedy, measure or monitor the effects that the RPSPC1 is seeking to address.</p>	Delete the policy in its entirety or clarify that this policy and the method to achieve it are a regional only function. Review proposal to ensure that this is feasibly able to be implemented and does not place undue obligations on landowners.
<b>S62 Philip Clegg</b>	S62.016	Policy CC.5: Avoid increases in	Support in part	There are many situations where a change in agricultural practice will result in both an increase and a decrease in emissions. The focus should be on the net change, not just on one side of the equation.	Amend as follows: Regionalplans shall include objectives, policies, rules and/or methods to avoid changesto land use activities and/or management practices that result in an increase,in <b>gross-net</b> greenhouse gas emissions from agriculture.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		agricultural greenhouse gas emissions - regional plan			
<b>S79 South Wairarapa District Council</b>	S79.022	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	<p>Council recognises that equitable reductions of greenhouse emissions are required. The Wairarapa must play its part, as does the agricultural sector. However, the use of 'avoid' is unnecessary and could limit policy options when developing provisions at regional plan level. It is also unclear which only agriculture is targeted to 'avoid' increases, particularly as the emissions from the sector are generally reducing and only a small proportion of overall emissions. In respect of net emissions, the regional inventory shows that (3):</p> <p>[Note: 3 references GWRC, 18 May 2020, Wellington Region Greenhouse Gas Inventory]</p> <ul style="list-style-type: none"> <li>• Wairarapa accounts for 14%</li> <li>• Kapiti accounts for 11%</li> <li>• The urban whaitua (Wellington, Hutt, Porirua) account for 75% of net regional emissions</li> </ul> <p>The policy doesn't reflect the diverse and temporally variable nature of farming systems and could create a 'sinking lid' for farming in the Wairarapa Sub-Region.</p> <p>While no methods are included, and the policy applies to regional plans only, this policy appears to set the initial framework for RMA plans targeting agricultural emissions. SWDC is concerned with the implications of this, and with the interaction or conflict it might have with other agricultural emission reduction measures.</p> <p>SWDC DC wishes to understand how this reduction aligns with Government policy in the area. It is unclear how fair and reasonable reductions should be calculated and consistently applied in consenting. A more fulsome assessment of economic effects in the s.32 assessment is required to underpin the policy. In</p>	<p>Delete Policy CC.5, OR Amend Policy CC.5 as follows: Regional plans shall include objectives, policies, rules and/or methods <del>to avoid</del> that manage changes to land use activities and/or management practices that result in an increase, in gross greenhouse gas emissions from agriculture in order to meet the targets set out in Objective CC.3. Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>particular, where:</p> <p>a. Reductions required by this policy is in excess of government policy; and,</p> <p>b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and,</p> <p>c. Impacts go beyond only the economic impact of carbon pricing; and,</p> <p>d. Considers the costs of the implied requirement to supplant farming activities with carbon sequestration.</p>	
<b>S95 Tony Chad</b>	S95.003	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	Central government is too slow to rein in carbon emitting agriculture	Require Regional Plans to have Carbon Reduction Plans (CRPs)
<b>S96 Sarah (Dr) Kerkin</b>	S96.012	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	There are many situations where a change in agricultural practice will result in both an increase and a decrease in emissions. The focus should be on the net change, not just on one side of the equation.	Amend as follows: Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in <b>gross net</b> greenhouse gas emissions from agriculture.
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.016	Policy CC.5: Avoid increases in agricultural greenhouse gas	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		emissions - regional plan			
<b>S128 Horticulture New Zealand</b>	S128.022	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	<p>A nationally consistent approach to phase out is preferred for industrial process heat using coal as a fuel source.</p> <p>The term 'management practices' may be too specific and granular in scale - reflecting that at an on-farm management scale there may be trade-offs to be made between other outcomes such as those relating to freshwater and biodiversity. The wording 'change in intensity or type of agricultural land use' which is used in Policy CC.13 is considered more appropriate in terms of the level at which a regional plan might regulate.</p>	<p>Amend.</p> <p>Regional plans shall include objectives, policies, rules and/or methods to: <b>(a) avoid changes in the intensity or type of agricultural land use to land use activities and/or management practices</b> that result in an increase, in gross greenhouse gas emissions from agriculture <b>at the region [or whaitua] scale, and (b) enable land use change in the region to lower emissions rural land uses or land use practices.</b></p> <p>OR, in lieu of adding (b), add a new policy <b>Regional plans shall include objectives, policies, rules and/or methods that recognise the benefits of, and enable rural land use change that contributes to reducing gross greenhouse gas emissions from agriculture.</b></p>
<b>S131 Ātiawa ki Whakarongotai Charitable Trust</b>	S131.051	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	Ātiawa supports Policy CC.5. It is important that the word avoid has been applied to this policy, this is supported by Ātiawa.	Retain as notified.
<b>S133 Muaūpoko Tribal Authority</b>	S133.038	Policy CC.5: Avoid increases in	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		agricultural greenhouse gas emissions - regional plan			
<b>S136 DairyNZ</b>	S136.015	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>Whilst support the intent to reduce agricultural emissions, concerned about the inconsistencies and duplication of the work underway through the He Waka Eke Noa partnership and the Governments pricing proposal for agricultural greenhouse gas emissions. Developing a regionalised approach to a national issue will lead to misalignment with national policies and instruments, confusion at local level, misallocation of resources and unintended consequences.</p> <p>Another concern is around the issue of emissions leakage. Any shift in production offshore due to domestic and regional policy setting would lead to an increase in global greenhouse gas emissions due to other producers being less efficient.</p>	Delete Objective CC.5 and any related provisions or methods and address the issue through a full review of the RPS.
<b>S163 Wairarapa Federated Farmers</b>	S163.046	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>Concerned with the "avoid increase" directive for agricultural greenhouse gas emissions, particularly when other sectors are not subject to similar policies (e.g. industry and transport).</p> <p>Concerned that this policy may result in perverse outcomes, eg, landuse change from pastoral farming to other uses could see a reduction in short-lived agricultural emissions, but an increase in long-lived carbon dioxide emissions. Refer to submission for more detail.</p>	That Policy CC.5 be deleted.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc.</b>	S165.038	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions -	Support in part	<p>Amendments are needed to direct that emissions are not contributed to.</p> <p>Amendments are also needed to capture a wider range of sectors, such as the waste management sector (methane from landfills) and the expansion of ports (emissions from cruise ships).</p>	<p>Amend as follows: Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that <b>contribute to greenhouse gas emissions</b> or result in an increase in gross greenhouse gas emissions <del>from agriculture.</del></p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
(Forest & Bird)		regional plan			
<b>S166 Masterton District Council</b>	S166.045	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Not Stated / Neutral	This reads as not allowing land use intensification - is this correct? What is the intent? We would like a seat at the table for designing this regional plan. Is this going to trigger farming activity resource consent requirements? Will all farming activity need to be consented?	<ul style="list-style-type: none"> <li>MDC asks that it is part of the design for this plan.</li> <li>Further clarity required to confirm whether this policy is about not allowing land use intensification and what it means for farming activity.</li> </ul>
<b>S167 Taranaki Whānui</b>	S167.065	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	We are aware that central government is taking the lead on the policy approach but given the climate crisis and the role agriculture plays, Taranaki Whānui as mana whenua feel strongly that the minimum expectation for this region should aim for reduction.	Amend the policy to read: Policy CC.5: <b>Make reductions</b> <del>Avoid increases</del> in agricultural greenhouse gas emissions - regional plan
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0119	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	In principle, Rangitāne o Wairarapa strongly support any measures to require a reduction in agricultural emissions, rather than simply avoiding increased emissions from this sector.	Rangitāne o Wairarapa seek that the Regional Council uses any means available to them, including through the RPS if government policy and legislation allows, to require a reduction in agricultural greenhouse gas emissions.
<b>S11 Outdoor Bliss Heather Blissett</b>	S11.014	Policy CC.6: Increasing regional forest cover and avoiding	Support in part	Add plural. Trees are social.	Amend explanation of Policy CC.6 as follows: "...The policy directs regional plans to develop provisions that will support "right trees-right place", seeking..."

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		plantation forestry on highly erodible land - regional plans			
<b>S16 Kāpiti Coast District Council</b>	S16.019	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	We support the intent of the policy but request it is carefully checked to ensure it does not unnecessarily duplicate NPS-PF requirements. We request the implementation of this policy remains the responsibility of GWRC only.	Retain
<b>S25 Carterton District Council</b>	S25.019	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	<p>CDC supports this policy, and particularly that it requires the avoidance of plantation forestry on highly erodible land.</p> <p>CDC does have concerns that the Wairarapa will be expected to provide a greater proportion of permanent forest cover than other areas because it has larger areas of rural land. When the driver for increased afforestation is achieving net zero carbon emissions, it appears inequitable that the Wairarapa might suffer from greater afforestation when there is a lack of emission reduction in other areas. CDC seeks that the policy reflect that offset should occur in the area where emissions are generated.</p> <p>While permanent forest, and particularly indigenous permanent forest, has significant benefits, it is not productive and therefore the Wairarapa may bear an unreasonable burden from this policy. CDC requests that the policy is amended to reflect that permanent forest should not be planted on productive land.</p>	Amend the policy so that permanent forest is not encouraged on highly productive land. Provide a more supportive policy framework for this when a variation is prepared to respond to the NPS-HPL.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S30 Porirua City Council</b>	S30.030	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose	<p>Council supports the intent of this policy. However, is unclear what 'support' means in this context, and 'enable' or 'require' may be more appropriate. For example, as the relevant objective seeks that there is an increase, the term 'supporting' may be insufficient. As raised with the corresponding objective, the amount of 'increase' needs to be articulated.</p> <p>The text requested to be deleted is not needed, as it is simply repeating the objective.</p> <p>While Council agrees with the intent to encourage indigenous forest restoration to allow greater biodiversity and soil reclamation, we note that this policy could potentially impact carbon farming where permanent exotic forests are used. Exotic forest has a greater storage of carbon, both in the short and long term. Council understands that there is some uncertainty in national policy with regard to whether permanent exotic forest should or should not get ETS credits.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of permanent forest in the region <del>to contribute to achieving net-zero greenhouse gas emissions by 2050</del>, while:</p>
<b>S31 Robert Anker</b>	S31.017	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Not Stated / Neutral	<p>Offsetting through carbon sequestration is a viable, long-term solution. GWRC may seek to reduce emissions and might even, to some extent, succeed. The emphasis on permanent indigenous forest has little to do with whether it is the most effective course of action to sequester carbon but is greatly influenced by a philosophical mindset.</p> <p>Forest, comprised of any species, will only produce a net storage of carbon while it is in an active growing phase. Once the forest is mature it reaches a state of limbo where there is no longer a net absorption of carbon and as trees within the forest die and fall to the forest floor and rot, the forest becomes a net emitter of methane.</p>	<p>GWRC review the calculations which have been used to support the concept that permanent forest gives the best overall outcome taking all factors into consideration. GWRC to produce the scientific evidence for scrutiny and peer review.</p>
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.042	Policy CC.6: Increasing regional forest cover and avoiding	Support in part	<p>Support the measures to increase forest and that this is a regional function only, however, it is unclear how this will be balanced against housing need, and it does not appear that this is supported by the Emissions Trading Scheme Credit which may impact on willingness to adopt the practice.</p>	<p>Advocate for central government supporting indigenous forest cover in the Emissions Trading Scheme as the primary incentive for the implementation of this method.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		plantation forestry on highly erodible land - regional plans		There is a need to ensure that regional council adequately resources incentives for landowners.	
<b>S62 Philip Clegg</b>	S62.017	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose in part	Questions the evidential basis for the assertions that indigenous forest is better at sequestering carbon than exotic forest, or that permanent forest is better at carbon sequestration than, say, sustainably farmed timber forests (which could be native or exotic species). Refer to submission for more detail on reasoning.	Revisit the assertion in the policy that permanent indigenous forest gives the best overall outcome taking all factors into consideration and produce the scientific evidence for scrutiny and peer review.
<b>S79 South Wairarapa District Council</b>	S79.023	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose in part	<p>A more fulsome assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where:</p> <ul style="list-style-type: none"> <li>a. Reductions required by this policy is in excess of government policy; and,</li> <li>b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and,</li> <li>c. Goes beyond the economic impact of carbon pricing; and,</li> <li>d. Considers the cost of the implied requirement to supplant farming activities with carbon sequestration.</li> </ul> <p>The proposed approach facilitates the complete afforestation of all rural business land in the district. There is insufficient analysis of costs and benefits, particularly in the long term to the region and the South Wairarapa District. This is evident by a lack on limitations proposed. Offsetting of greenhouse gas has limitations, particularly where no controls have been put</p>	<p>Either delete Policy CC.6, or Amend Policy CC.6 as follows: Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of permanent forest in the region to contribute to achieving net-greenhouse gas emissions by 2050, while:</p> <ul style="list-style-type: none"> <li>(a) promoting and incentivising the planting or regeneration of permanent indigenous forest over exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached, and</li> <li>(b) avoiding plantation forestry on highly erodible land, particularly in catchments where water quality targets for sediment are not reached and</li> <li>(c) not enabling afforestation of permanent forest for the purpose of offsetting emissions from outside of the environment they are located</li> <li>(d) ensuring that any offsets are proportionate and only considered after avoidance or reductions at source have been maximised.</li> </ul> <p>[End of amendments to Policy CC.6] Or, similar relief to the same effect; AND;</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>in place at source.</p> <p>SWDC does have concerns that the Wairarapa will be expected to provide a greater proportion of permanent forest cover than other areas because it has larger areas of rural land. When the driver for increased afforestation is achieving net zero carbon emissions, it appears inequitable that the Wairarapa might suffer from greater afforestation when there is a lack of emission reduction in other areas.</p>	
<b>S96 Sarah (Dr) Kerkin</b>	S96.013	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Oppose in part	<p>Questions the evidential basis for the assertions that indigenous forest is better at sequestering carbon than exotic forest, or that permanent forest is better at carbon sequestration than, say, sustainably farmed timber forests (which could be native or exotic species). Refer to submission for more detail on reasoning.</p>	<p>Revisit the assertion in the policy that permanent indigenous forest gives the best overall outcome taking all factors into consideration and produce the scientific evidence for scrutiny and peer review.</p>
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.017	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	<p>Generally supports the regulatory policies in the 'Climate Change' chapter.</p>	<p>Retain as notified.</p>
<b>S123 Peter Thompson</b>	S123.004	Policy CC.6: Increasing	Support	<p>Allowing regeneration or planting of indigenous forest on highly erodible land will provide multiple benefits.</p>	<p>Retain as notified.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional forest cover and avoiding plantation forestry on highly erodible land - regional plans			
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.052	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	Ātiawa supports the overall intent of Policy CC.6 to increase permanent forest cover to reduce greenhouse gas emissions, promoting and incentivising indigenous forest cover and avoiding plantation forestry on highly erodible land. The Trust is concerned that this policy could affect whānau, hapū, and iwi that have an interest in plantation forestry.	Ātiawa seeks that further engagement occurs with Māori who have land that could be affected by Policy CC.6.
<b>S133 Muaūpoko Tribal Authority</b>	S133.039	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
<b>S137 Greater Wellington</b>	S137.059	Policy CC.6: Increasing	Support in part	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and	Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Regional Council (GWRC)</b>		regional forest cover and avoiding plantation forestry on highly erodible land - regional plans		particularly in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon sink. Amendments are required to make the intent clear.	that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.
<b>S144 Sustainable Wairarapa Inc</b>	S144.007	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Allowing regeneration or planting of indigenous forest on highly erodible land will provide multiple benefits. In the Wairarapa, sedimentation and temperature increases are having the biggest impact on stream health. Increasing indigenous forest cover will provide benefits to carbon sequestration, indigenous biodiversity and freshwater health	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.050	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified
<b>S163 Wairarapa</b>	S163.047	Policy CC.6: Increasing	Oppose	Defer to the full review of the RPS in 2024.  This policy is pre-empting policy development which is	That Policy CC.6 be deleted Delete the FW icon.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Federated Farmers		regional forest cover and avoiding plantation forestry on highly erodible land - regional plans		in process at the national level. Refer to submission for significant detail on the challenge of managing forestry.	
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.039	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	It is ecologically responsible to prioritise the planting or restoration of indigenous vegetation over exotic. However, a wording change is required to ensure the policy is strengthened, and that there is policy support for other indigenous vegetation to be captured.	Amend as follows: Regional plans shall include objectives, policies, rules and/or methods that <del>support</del> <b>require</b> an increase in the area of permanent forest <b>and wetlands</b> in the region to contribute to achieving net-zero greenhouse gas emissions by 2050, while: (a) promoting and incentivising the planting or regeneration of permanent indigenous <del>forest</del> <b>vegetation</b> over exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached, and Also amend the title to this policy to reflect the change sought.
S166 Masterton District Council	S166.046	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Not Stated / Neutral	More clarity on this policy is required to ensure that the Wairarapa is not the carbon sink for the greater Wellington region. Acknowledge the amendment of Method CC.4 that spatial plan to be prepared using a partnership approach. More clarity needed on who the partnership approach will be with.	MDC strongly recommends that it is involved in the development of this plan as well as relevant sector and communities.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S167 Taranaki Whānui</b>	S167.066	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	Given historical land confiscations and development barriers - there needs to be a specific protection in place to prevent further disadvantage to mana whenua. Future planning in partnership with mana whenua will provide greater confidence of the implementation through regional plans.	Insert a new clause (c) to read: <b>(c) resource and partner with mana whenua in the development of regional forest plans.</b>
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.043	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Not Stated / Neutral	<p>Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p> <p>It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District</p>	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.	
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0121	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	Support in part	Rangitāne o Wairarapa support the promotion and incentivisation of the planting or regeneration of permanent indigenous forest over exotic species. However, we request that 'financial incentives' are included in the explanatory text to highlight the influence such incentives can have in achieving regeneration of permanent indigenous forest.	Include reference to financial incentives in the explanatory text to the policy, as one tool amongst others, that will assist to achieve the "right tree-right place".
<b>S16 Kāpiti Coast District Council</b>	S16.020	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	<p>Council considers the nature-based approach does not fall under sections 30 or 31 of the RMA as it goes beyond the maintenance of indigenous biodiversity. Council notes the closest relevant legislative or statutory planning document reference is Policy 26 that provides for natural defenses against coastal hazards. Policy CC.7 proposes to go far beyond this.</p> <p>More fundamentally, we are unaware of any evidence that a genuine resource management issue exists, or if it does, that a regulatory method would be the most appropriate method to address it when compared to other reasonably practicable methods available.</p> <p>As the proposed approach does not appear to be required by the Act or any higher level statutory planning document, it is particularly concerning to Council that the mandatory application of the policy is proposed and that the district plan would be required to give effect to it.</p> <p>Overall, we consider the suggested requirement for district plans to require objectives, policies, rules and/or methods that provide for nature-based solutions to</p>	Delete Policy CC.7 entirely and investigate potential non-regulatory methods.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				climate change to be part of development and infrastructure planning and design, cannot be justified under section 32 of the RMA.	
<b>S30 Porirua City Council</b>	S30.031	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	<p>Council supports the intent of this policy, and has already attempted to enable 'soft- engineering measures' in our Proposed District Plan. This is defined clearly as follows: means a form of hazard mitigation that uses natural elements to provide protection to private properties, public space and infrastructure. It includes sacrificial fill, vegetation planting, beach nourishment and dune restoration.</p> <p>The definition of 'nature-based solution' relies on a common understanding of a number of terms used in that definition, such as "actions", "natural ecosystems", "natural elements", and "resilience", since those terms are not themselves defined.</p> <p>Further, a lack of clarity and regulatory certainty with this policy would likely lead to interpretation issues, and could require a regulatory framework that applies to all development regardless of scale and regardless of activity type. The s32 evaluation report does not identify why this level of regulatory reach is appropriate.</p> <p>It is difficult to reconcile the examples used in the definition with the creation of a regulatory framework that captures all development and infrastructure regardless of scale, as required by Policy CC.7.</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, including what is meant by "actions", "natural ecosystems", "natural elements", and "resilience".
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.043	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-	Oppose	<p>Council is concerned that there is no legislative ability to direct district plans on the use of nature- based solutions under sections 30 and 31 of the RMA. There is also no understanding of the full maintenance costs associated with these solutions over long term.</p> <p>Council also notes that there are other solutions which can achieve positive outcomes, which do not necessarily have natural components, e.g., subsurface water attenuation.</p> <p>See our notes on Objective CC.4 for comments</p>	<p>Delete or amend to make this policy a regional council function only.</p> <p><del>"District and Regional plans shall include objectives, policies, rules and/or methods..."</del></p> <p>Allow district councils to define and provide guidance on what tools best work under this policy as a mean of compliance, through their own definition of nature-based solutions.</p> <p>Provide clarity on nature-based solutions vs. green infrastructure and apply consistent terms throughout</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		based solutions to climate change - district and regional plans		regarding clarity of the definition of nature-based solutions.	the RPS.
<b>S79 South Wairarapa District Council</b>	S79.024	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	The policy intent is supported, there should be a corresponding non- regulatory method to develop guidance to integrate these solutions in infrastructure and development design options and assess when these solutions are and are not appropriate.	Retain as notified Include a non-regulatory method to develop guidance material for the application of nature based solutions included in infrastructure and development.
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.018	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change -	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		district and regional plans			
<b>S113 Wellington Water</b>	S113.014	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Nature-based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment	Amend the Policy as follows: District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, <b>where practicable.</b>
<b>S115 Hutt City Council</b>	S115.031	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose in part	The definition of "nature-based solutions" is not sufficiently clear for policy statement users to understand what is required. It is also unlikely that a district or regional plan would fail to provide for nature-based solutions to be part of development and infrastructure planning and design in the absence of this direction.	Delete Policy CC.7

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S123 Peter Thompson</b>	S123.005	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Nature-based solutions are key to dealing with the impacts of climate change.	Retain as notified.
<b>S127 Neo Leaf Global</b>	S127.008	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Regarding the explanation: At issue here is the presumption and lack of appreciation that nature-based solutions are not necessarily fit-for-purpose in all circumstances and may not offer pragmatic durable, safe or cost-effective solutions, and can not necessarily perform the roles and standards that infrastructure is required to meet.	Development and infrastructure planning and design should include <b>consideration of nature-based components solutions as standard practice</b> , including green infrastructure, green spaces, and environmentally friendly design elements to manage issues such as improving water quality and natural hazard protection. Nature-based <b>opportunities solutions</b> can contribute strongly to provision of <del>perform the roles of traditional</del> infrastructure <b>services</b> , while also building resilience to the impacts of climate change and providing benefits to indigenous biodiversity and community well-being."
<b>S128 Horticulture New Zealand</b>	S128.023	Policy CC.7: Protecting, restoring,	Support in part	Supports nature-based solutions where possible, however it acknowledges that other interventions will likely also be required. Supports this policy (of providing for nature-based solutions) but suggests a	Add a sentence to the Explanation paragraph. <b>This policy does not preclude the use of other solutions, where necessary or appropriate.</b>



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans		minor amendment to reflect our interpretation of the policy so this is clear.	
<b>S129 Waka Kotahi NZ Transport Agency</b>	S129.016	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Generally supports Policy CC.7 but consider that 'protecting' is too strong of a directive. The policy should be amended to be in keeping with the National Policy Statement for Indigenous Biodiversity drafting.	Amend Policy CC.7 as follows: <del>Protecting, restoring, and enhancing</del> <b>Managing</b> ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.053	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support in part	Ātiawa want nature based solutions; and we want to ensure that the ecosystems and habitats that support those nature based solutions are protected/enhanced/restore.	Amend to: <b>Policy CC.7: Providing for nature-based solutions to climate change in development and infrastructure planning and design. District and regional plans shall include objectives, policies, rules and methods to protect, restore and enhance ecosystems and habitats that provide nature based solutions and mātauranga Māori</b>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		habitats that provide nature-based solutions to climate change - district and regional plans			<b>approaches to climate change, including development and infrastructure planning and design. Priority shall be given to actions that provide the greatest cobenefit for climate change mitigation and adaptation, indigenous biodiversity, fresh and coastal water. District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design.</b>
<b>S133 Muaūpoko Tribal Authority</b>	S133.040	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
<b>S134 Powerco Limited</b>	S134.008	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats	Oppose	Nature based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment. Nor is it clear how nature-based solutions could perform the role of 'traditional infrastructure' such as gas and electricity distribution networks.	Amend Policy CC.7 to recognise the nature-based solutions may not be practicable in all situations and will not necessarily be able to perform the role of regionally significant infrastructure. This could be achieved by making changes along the following lines: "District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure

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		that provide nature-based solutions to climate change - district and regional plans			<p>planning and design, <b>where practicable</b>.</p> <p>Explanation:                      Development and infrastructure planning and design should include nature-based solutions <b>where practicable as standard practice</b>, including green infrastructure, green spaces, and environmentally friendly design elements, to manage issues such as improving water quality and natural hazard protection. Nature-based solutions can <b>assist in</b> perform the roles of traditional infrastructure, while also building resilience to the impacts of climate change and providing benefits for indigenous biodiversity and community well-being."</p>
<b>S144 Sustainable Wairarapa Inc</b>	S144.008	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services, such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.051	Policy CC.7: Protecting, restoring, and	Support	Necessary to give effect to the NPS-FM	Retain as notified

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans			
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.009	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Oppose	Nature based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment. Nor is it clear how nature-based solutions could perform the role of 'traditional infrastructure' such as regionally significant bulk fuel supply infrastructure.	<p>Amend Policy CC.7 to recognise the nature-based solutions may not be practicable in all situations and will not necessarily be able to perform the role of regionally significant infrastructure. This could be achieved by making changes along the following lines:                      Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans</p> <p>District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, <b>where practicable</b>.</p> <p>Explanation                      Development and infrastructure planning and design should include nature-based solutions <b>where practicable as standard practice</b>, including green infrastructure, green spaces, and environmentally friendly design elements, to manage issues such as improving water quality and natural hazard protection. Nature-based solutions can <b>assist in perform the roles of traditional infrastructure</b>, while also building resilience to the impacts of climate change and providing benefits for indigenous biodiversity and community well-being.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S163 Wairarapa Federated Farmers</b>	S163.048	Policy CC.7: Protecting, restoring, and enhancing ecosystem s and habitats that provide nature- based solutions to climate change - district and regional plans	Oppose	Defer to the full review of the RPS in 2024.  Concerned that "nature based solutions" are not explicitly exempt from being "significant natural areas" (SNAs) in RPS Change One and that regulatory roadblocks to beneficial nature-based solutions have not been addressed. Refer to submission for more details.	That Policy CC.7 be deleted Delete the FW icon
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.040	Policy CC.7: Protecting, restoring, and enhancing ecosystem s and habitats that provide nature- based solutions to climate change - district and regional plans	Support	This accords with Te Mana o te Taiao Aotearoa New Zealand Biodiversity Strategy 2020	Retain.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S166 Masterton District Council</b>	S166.047	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	The policy intent is supported, but there should be a corresponding non-regulatory method to develop guidance to integrate these solutions in infrastructure and development design options and assess when these solutions are and are not appropriate.	Retain as notified. However: Develop a corresponding non-regulatory method to develop guidance to support this policy.
<b>S167 Taranaki Whānui</b>	S167.067	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Taranaki Whānui supports new Policy CC.7 and notes in particular that it is informed by Method CC.6 which requires partnership with mana whenua.	Retain as notified,
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.044	Policy CC.7: Protecting, restoring,	Not Stated / Neutral	Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems	Clarify what is meant by 'nature-based solutions'.  Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans		<p>that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p> <p>It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.</p>	as this is a regional council mandate under the RMA hierarchy.
<b>S16 Kāpiti Coast District Council</b>	S16.021	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	<p>The suggestion that district plans include methods to prioritise reducing greenhouse gas emissions rather than offsetting is not supported by the RMA. City and district councils do not have any functions under the RMA to manage greenhouse gas emissions or apply greenhouse gas offsetting.</p> <p>It is unclear to us why GWRC would consider it appropriate to apply a mandatory policy that district plans would be required to give effect to when there is no lawful ability to do so. The statutory underpinning for this policy (and many other policies in the plan change) do not appear to have been explored or evaluated fully in the section 32 evaluation.</p>	Delete Policy CC.8.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				It appears to Council that GWRC have not explored the range of regulatory methods available to GWRC under section 30 of the RMA that it could put in place via its regional plan(s).	
<b>S25 Carterton District Council</b>	S25.020	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	<p>CDC supports this policy.</p> <p>It goes some way to addressing CDC's concerns that the Wairarapa will be expected to act as a 'carbon sink' for the Wellington region via extensive afforestation.</p> <p>This policy makes it clear that afforestation should not be a primary method for achieving net-zero emissions. As stated above, any offsetting should be applied equitably across the region and should occur in the local area in which emissions are generated.</p>	Retain this policy.
<b>S30 Porirua City Council</b>	S30.032	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	<p>This policy needs to be redrafted to be clearer and more certain and be supported by guidance and implementation support.</p> <p>District plans do not currently require the offsetting of greenhouse gas emissions, so it is unclear why policy direction is needed to discourage it. Emissions offsetting is addressed through the ETS. Territorial authorities do not have capability and capacity to implement GHG offsetting regimes. Nor do they have the function under s31 to address discharges of greenhouse gases. This is a regional council function.</p> <p>If district plans should be contemplating offsetting, the RPS needs to provide direction as to when it may be appropriate and how it should be undertaken, including how this relates to the ETS. That will reduce the extent of different approaches taken between councils and the amount of potential litigation.</p> <p>The explanation refers to 'hard-to-abate' sectors - what these are should be set out in the policy itself.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: District and regional plans shall include objectives, policies, rules and/or methods <del>to that</del> prioritise reducing greenhouse gas emissions in the first instance <b>and only provide for offsetting in circumstances where: [...]</b> rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply.</p> <p>Amend the RPS include a method requiring the regional council to publish guidance on how this policy is to be implemented and, on the type, and scale of activities to which the policy will apply.</p>
<b>S34 Te Kaunihera o Te Awa Kairangi ki</b>	S34.035	Policy CC.8: Prioritising greenhouse	Oppose	<p>It is unclear whether this policy applies to urban or rural areas, or both and how these are defined.</p> <p>Council is unclear on the legislative basis for the</p>	<p>Delete provision in its entirety or amend to provide options in guidance for a suite of non- regulatory methods that could achieve an outcome rather than a regulatory approach. Should provision be retained, it should be amended to read:</p>



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Uta, Upper Hutt City Council</b>		e gas emissions reduction over offsetting - district and regional plans		<p>approach. Given the lack of statutory basis it is unclear how district plan could give regard to this policy in its decision making under the RMA. Therefore, Council considers this policy should relate to only regional plans should the provision be retained.</p> <p>Council considers that a suite of tools should be applied to address greenhouse gas emissions, not just one option, as all sites are all different.</p> <p>In addition, Council notes proposed methods don't seem to sit with the policy, for example, the methods include producing guidance, programmes to support reduction, and review regional response. It is inappropriate to be in a position where guidance outside of the RPS sets direction for inclusion of elements in district plan.</p> <p>This places undue obligation on the applicant and territorial authorities to assess, enforce and monitor as well as identifying thresholds.</p> <p>Council notes that there was not response by GWRC to the KCDC submission in the Section 32 report on this policy.</p>	<p><del>District and R</del>Regional plans shall include objectives, policies, rules and/or methods to prioritise..." District and city councils will still be required to give effect to the RPS, and assessment and appropriate measures can be assessed on a site-by-site basis.</p>
<b>S79 South Wairarapa District Council</b>	S79.025	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	<p>The policy limits the need to offset costs onto rural communities in the region.</p> <p>Council recognises the relationship with policy CC6, and that they should be read together. However, CC.6 requires further clarification regarding proportionality and location of offsets.</p> <p>As such, the amendments proposed by SWDC need to remain alongside CC.8.</p>	Retain as notified
<b>S102 Te Tumu Paeroa   Office of</b>	S102.019	Policy CC.8: Prioritising greenhouse gas	Support	<p>Generally supports the regulatory policies in the 'Climate Change' chapter.</p>	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
the Māori Trustee		emissions reduction over offsetting - district and regional plans			
S118 Peka Peka Farm Limited	S118.007	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	The policy oversteps the role of the resource management planning framework and addresses matters that are best suited to national policy direction.	Delete Policy CC.8.
S128 Horticulture New Zealand	S128.024	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Support a focus on support a focus on emissions reductions as the priority over offset.	Retain as notified.
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.054	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and	Support	In principle Ātiawa supports the intent of Policy CC.8. However, the Policy (and RPS Change 1) lacks sufficient detail on how activities will be identified and how scale will be determined. It is concerning that some activities could be excluded from prioritising reducing greenhouse gas emissions over offsetting, particularly hard-to-abate sectors.	Amend to: Explanation This policy recognises the importance of reducing gross greenhouse gas emissions as the first priority, <del>and only using carbon removals to offset emissions from hard-to-abate sectors.</del> Relying heavily on offsetting will delay people taking actions that reduce gross emissions, lead to higher cumulative emissions and push the burden of addressing gross emissions onto

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans			future generations.
<b>S133 Muaūpoko Tribal Authority</b>	S133.041	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
<b>S140 Wellington City Council (WCC)</b>	S140.033	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Support as proposed.	Retain as notified.
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.024	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	<p>While WIAL understands the intent of this policy, it is noted that it may be too simplistic to apply this to the airport and aviation industry at this time. For example, in 2016 the Government agreed New Zealand would participate in the ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) 2.</p> <p>[Note 2 references - Ministry of Transport "CORSIA" at <a href="https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/">https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/</a>]</p> <p>CORSIA is a global market-based measure for reducing and offsetting carbon emissions in the international aviation sector 3.</p>	Delete this policy or make it clear that it does not apply to Wellington International Airport and aviation industry

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>[Note 3 references - Ministry of Transport "CORSA" at <a href="https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/">https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/</a>]</p> <p>The scheme is to remain in place until 2035 and will operate as a global carbon market. Participation is only voluntary between 2021 and 2026. The second phase from 2027 onward will require mandatory participation of most ICAO member states.</p> <p>When the scheme becomes mandatory, airlines will be required to purchase carbon credits and finance abatement activities outside the aviation sector for emissions generated by international routes.</p> <p>In August 2019, the Government reconfirmed the decision to participate in CORSA from 2021, and agreed to implement it through the Civil Aviation Bill 4.</p> <p>[Note 4 references - The Explanatory Note for the Civil Aviation Bill states that the framework is intended to enable New Zealand to meet its obligations under CORSA.]</p> <p>The Bill is currently in its second reading stage before parliament. Among other matters, the Bill would see substantive policy changes to require certain airline operators offering international air services as a New Zealand airline to implement an emissions reporting and monitoring plan, and perform various emissions monitoring and reporting requirements 5.</p> <p>[Note 5 references - The monitoring and reporting requirements are provided under Part 6, Subpart 3 of the Civil Aviation Bill]</p> <p>In this situation mandatory carbon offsetting is expected to directly lead to a net reduction in emissions. It is therefore too simplistic for this policy to prioritise a reduction in emissions over offsetting.</p>	
<b>S158 Kāinga</b>	S158.016	Policy CC.8:	Support in part	Seeks clarity as to why district plans are included within this policy as offsetting is limited to regional plans.	Amend policy as follows: Policy CC.8: Prioritising greenhouse gas emissions reduction

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Ora Homes and Communities</b>		Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans			over offsetting - <del>district and regional plans</del> District and regional Regional plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply.
<b>S163 Wairarapa Federated Farmers</b>	S163.049	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Oppose	Defer to the full review of the RPS in 2024	That Policy CC.8 be deleted
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.041	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support in part	It is not appropriate for certain activities to be exempt from the requirement to prioritise reducing emissions over offsetting.	Amend as follows: District and regional plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, <del>and to identify the type and scale of the activities to which this policy should apply.</del> Include <b>additional policy direction</b> to require that, where there is no possible alternative to reducing greenhouse gas emissions, offsets must be achieved by the planting of indigenous vegetation over plantation forestry
<b>S166 Masterton District Council</b>	S166.048	Policy CC.8: Prioritising greenhouse gas emissions	Support	No reason was given for this submission point	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		reduction over offsetting - district and regional plans			
<b>S167 Taranaki Whānui</b>	S167.068	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Taranaki Whānui supports new Policy CC.8	Retain as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.045	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Not Stated / Neutral	<p>Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.	
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0123	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	Support	Rangitāne o Wairarapa support objectives, policies, rules and/ or methods to prioritise reducing greenhouse gas emissions.	Retain as notified.
<b>S16 Kāpiti Coast District Council</b>	S16.032	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support	We consider the proposed amendments will result in the policy being more consistent with the requirements of the NZCPS.	Retain.
<b>S30 Porirua City Council</b>	S30.033	Policy 3: Protecting high natural character in the coastal environment - district and	Support	Council supports being consistent with the NZCPS.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans			
<b>S32 Director-General of Conservation</b>	S32.010	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support	The proposed changes give better effect to Policy 13 of the NZCPS. Some elements proposed to be removed from the explanation could potentially be retained or reworded, but doing so would not alter the effect of the Policy.	Retain as notified
<b>S78 Beef + Lamb New Zealand Limited</b>	S78.008	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Not Stated / Neutral	Accepts that amendments to operative Policy 3 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
<b>S100 Meridian Energy Limited</b>	S100.013	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Oppose	This part of the operative explanation remains relevant. The protection required by the RMA is against inappropriate (not appropriate) use and development.	Reinstate part of the deleted text and insert reference to the words of s. 6 (a) of the RMA as follows (or in a similar manner to achieve the same effect): <b>"Section 6 (a) of the Resource Management Act requires that the preservation of the natural character of the coastal environment must be recognised and provided for and protected from inappropriate use and development. The Resource Management Act does not preclude appropriate use and development in the coastal environment."</b>



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.081	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support	Generally supports Policy 3 for the Coastal Environment.	Retain as notified.
<b>S115 Hutt City Council</b>	S115.032	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support	No reasons provided	Retain as notified
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.055	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support in part	Policy 3 does not provide strong policy direction, particularly providing the clear distinction between how matters in clause (a) and (b) should be considered. The policy relies on the explanation to clarify that matters in (b) can compromise, modify or otherwise diminish the natural character. Ātiawa seeks that Regional Council partner with mana whenua when identifying areas with high natural character. Ātiawa maintain their rangatiratanga within the Ātiawa rohe. Te Tiriti guarantees a partnership approach to resource management.	Amend to: <b>In partnership with mana whenua</b> , district and regional plans shall include policies, rules and/or methods to protect high natural character in the coastal environment from inappropriate subdivision, development and/or use. Natural character should be assessed considering the following matters, with a site determined as having high natural character when the landscape is slightly modified or unmodified, the land-cover is dominated by indigenous vegetation and/or the vegetation cover is natural and there are no apparent buildings, structures, or infrastructure:
<b>S140 Wellington City</b>	S140.034	Policy 3: Protecting high	Support	Support as proposed.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Council (WCC)</b>		natural character in the coastal environment - district and regional plans			
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.030	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support in part	Support the changes made to this policy, however it is not clear as to how such amendments fit within the general theme of this policy.	Accept the amendments.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.042	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support in part	This policy only provides protection for areas of high natural character in the coastal environment. NZCPS policy 13 requires the protection of all areas of natural character. While the mapping requirement only extends to areas of high natural character, the obligation to avoid significant adverse effects applies more broadly (see NZCPS policy 13(1)(b) and (d)).	Amend this policy, or include a new policy, to ensure that all areas of natural character in the coastal environment are adequately protected in accordance with policy 13 NZCPS.
<b>S166 Masterton District Council</b>	S166.021	Policy 3: Protecting high natural character in the coastal environment - district	Support in part	The Wairarapa Combined District Plan Coastal Environment Area Overlay types will remain which controls the way development is considered in the coastal environment with tighter restrictions than the receiving zone. What are the bottom lines?	Retain as notified. However:  Further clarity is required: - Will this mean we can't do protection work on the coast? - Is the intent to block hard infrastructure? - If we still use hard infrastructure, how do we do it? i.e. where in the RPS is this covered?

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and regional plans			- Need to reference sea level rise and implications
<b>S167 Taranaki Whānui</b>	S167.069	Policy 3: Protecting high natural character in the coastal environment - district and regional plans	Support in part	Taranaki Whānui supports the amendments to Policy 3, however we would like to see regional council resource and partner with mana whenua in identifying and protecting areas of high natural character.	Retain as notified.
<b>S10 Transpower New Zealand Limited</b>	S10.001	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	<p>Transpower supports Policy 7 recognising the importance of transmission infrastructure that distributes renewable or zero/low carbon energy. The proposed changes to Policy 7 introduce the term "low and zero carbon". The term "low or zero carbon" has not been defined and it is unclear what it is intended to mean, particularly in the context of "low and zero carbon regionally significant infrastructure" in Policy 7.</p> <p>As the policy covers several rather distinct elements, it would be clearer if different elements could be more clearly articulated and distinguished within the existing Policy 7. Transpower notes that the policy refers to people having access to energy and requests specific recognition be included in the policy of the transmission system required to enable that access to energy. Such policy recognition would give effect to Policy 1 of the NPSET.</p>	Clarify the term "low and zero carbon", particularly in relation to regionally significant infrastructure, and how it is applied. Amend Policy 7 to recognise and provide for electricity transmission. Transpower requests the insertion of a new (a)(iv): <b>(iv) the provision of an efficient and effective electricity transmission system; and</b>
<b>S16 Kāpiti Coast District Council</b>	S16.033	Policy 7: Recognising the benefits from renewable energy and regionally significant	Support in part	This policy is generally consistent with the Operative Kapiti Coast District Plan 2021. Council agrees recognition of the benefits of renewable energy and regionally significant infrastructure is an appropriate directive, however placing emphasis on low or zero energy, and low and zero carbon regionally significant infrastructure is not supported by the RMA or higher-level statutory planning document.	<p>Amend as follows:</p> <p>District and regional plans shall include policies and/or methods that recognise:</p> <p>a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, <del>and in particular</del> <b>including</b> low and zero carbon regionally significant infrastructure including:</p> <p>Explanation</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		infrastructure - regional and district plans		Council has concerns with the suggested shift in emphasis due to the potential implications for our wastewater and potable water infrastructure (which are identified as regionally significant infrastructure). The suggested shift in emphasis in Policy 7 is unjustified and may have a negative impact on the Council's future consent applications for new or upgraded infrastructure.	Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits both within and outside the region, <del>in particular if regionally significant infrastructure is a low or zero carbon development.</del>
<b>S25 Carterton District Council</b>	S25.021	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	<p>While CDC supports the intent of this provision, the references to 'low or zero carbon' activities do not make sense here, and there are other terms that can more effectively convey the requirements of this policy.</p> <p>It is unclear what 'low and zero carbon regionally significant infrastructure' might include, and how this might be assessed.</p> <p>Replacing 'Low or zero carbon energy' with 'renewable energy' provides greater clarity (noting that the vast majority of residents access their energy from the National Grid or non-local sources of gas and therefore this clause has limited effect).</p>	<p>Amend the explanation so that it is clear what is meant by 'low and zero carbon regionally significant infrastructure'; or alternatively, remove the proposed additions to (a).</p> <p>Amend (a)(i) as follows: <i>(i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to public transport, active transport or low or zero carbon multi modal travel modes;</i></p> <p>Amend (a)(iii) as follows: (iii) people have access to energy, and preferably renewable low or zero carbon energy, so as to meet their needs; and</p>
<b>S30 Porirua City Council</b>	S30.034	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Oppose	Low and zero carbon regionally significant infrastructure needs to be defined to improve clarity and regulatory certainty.	'Low and zero carbon' 'regionally significant infrastructure' needs to be defined to improve clarity and regulatory certainty.
<b>S30 Porirua</b>	S30.035	Policy 7: Recognising the	Oppose	It is unclear why this policy only requires policies and/or methods.	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows:

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
City Council		benefits from renewable energy and regionally significant infrastructure - regional and district plans			District and regional plans shall include <b>objectives, policies,</b> rules and/or <b>other</b> methods that recognise:
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.030	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	<p>It is noted that there is no legislative support for 'having particular regard for' low and zero carbon regionally significant infrastructure or definition of what this means.</p> <p>It is unclear if this includes embodied carbon and if so how this would be addressed.</p> <p>Some regionally significant infrastructure, particularly roads may not in themselves be low or zero carbon but can accommodate low or zero carbon multi modal travel.</p> <p>Some of these matters are also not within the control of district plans to achieve, or it is unclear how the district plans can support low and zero carbon regionally significant infrastructure transitioning to low or zero carbon multi modal travel modes. As an example, district plans cannot influence travel choice, public transport fuel choice or funding to support and public transport.</p>	<p>Amend policy to read:                      "District and regional plans shall include policies and/or methods that recognise:                      (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, <b>including and in particular</b> low and zero carbon regionally significant infrastructure <b>in ways that can including:</b>                      (i) <b>encourage</b> people and goods <del>can to</del> travel to, from and around the region efficiently and safely and in ways that support transitioning to promote low or zero carbon multi modal travel modes;                      (ii) <b>maintain</b> public health and safety <del>is maintained through the provision of and</del> enabling essential services: <del>supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</del>                      (iii) <del>people have</del> support access to energy, and preferably low or zero carbon energy, so as to meet their needs; and                      (iv) <del>people have</del> support access to telecommunication services. ..."</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S49 Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand Trading Limited</b>	S49.002	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	The amendments proposed to Policy 7 create a weighting which requires particular recognition of low and zero carbon regionally significant infrastructure above regionally significant infrastructure. The policy needs to explain what low and zero carbon regionally significant infrastructure is, and also needs to ensure that the importance of regionally significant infrastructure is not minimised if it does not meet the definition of low and zero carbon regionally significant infrastructure.	Retain Policy 7, with an amendment to explain what <i>low and zero carbon regionally significant infrastructure</i> is and how this is different to defined regionally significant infrastructure in the RPS.
<b>S79 South Wairarapa District Council</b>	S79.026	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	Retain as notified  While SWDC supports the intent of this provision, the references to 'low or zero carbon' activities do not make sense here, and there are other terms that can more effectively convey the requirements of this policy. It is unclear what 'low and zero carbon regionally significant infrastructure' might include, and how this might be assessed. Replacing 'Low or zero carbon energy' with 'renewable energy' provides greater clarity (noting that the vast majority of residents access their energy from the National Grid or non- local sources of gas and therefore this clause has limited effect).	Amend the explanation so that it is clear what is meant by 'low and zero carbon regionally significant infrastructure'; or alternatively, remove the proposed additions to (a). Amend (a)(i) as follows: (i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning <b>to public transport, active transport or</b> low or zero carbon multi modal travel modes; Amend (a)(iii) as follows: (iii) people have access to energy, and <b>preferably renewable <del>low or zero carbon</del> energy</b> , so as to meet their needs; and Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.
<b>S83 CentrePort Limited</b>	S83.002	Policy 7: Recognising the benefits from renewable energy and regionally	Support	Recognising the benefits of RSI	Retain as notified

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant infrastructure - regional and district plans			
S99 Genesis Energy Limited	S99.001	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	<p>The purpose of RPS Change 1 is to reduce GHG emissions rapidly. It is already recognized that support is required to hasten the transition of the energy economy to renewable sources. Genesis considers the current passive policy wording of 'recognising' the benefits from renewable energy does not meet the purpose of RPS Change 1 and will not induce change from the status quo. More direct and active wording is required, and can be achieved by the use of the words to 'promote and enable' as set out in the decision sought column.</p> <p>In addition to promoting and enabling renewable energy development, Genesis considers the policy direction should also seek to protect the benefits derived from this infrastructure from reverse sensitive effects. Renewable energy development is dependent on the ability to locate where the resource is and the benefits from renewable energy is wide reaching and extends beyond the region boundaries. The protection of these benefits must be provided and is separate to the existing Policy 8 which seeks to protect regionally significant infrastructure.</p>	<p>Amend Policy 7 as shown below.</p> <p>Policy 7: <b>Recognising Promote, enable and protects</b> the benefits from renewable energy and regionally significant infrastructure - regional and district plans.</p> <p>District and regional plans shall include policies and/or methods that <del>recognise</del>:</p> <p>(a) <b>Promotes and enables</b> the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including:</p> <p>(i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to low or zero carbon multi modal travel modes;</p> <p>(ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</p> <p>(iii) people have access to <b>secure and affordable</b> energy, <b>maximising and</b> <del>preferably</del> low or zero carbon energy sources, so as to meet their needs; and</p> <p>(iv) people have access to telecommunication services.</p> <p>(b) <b>Promotes and enables</b> the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</p> <p>(i) security of supply and diversification of our energy</p>

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>sources;                      (ii) reducing dependency on imported energy resources;                      and                      (iii) reducing greenhouse gas emissions.(c)  <b>Protects the social, economic, cultural and environmental benefits of renewable energy and regionally significant infrastructure from reverse sensitivity effects.</b>                      Explanation                      Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits both within and outside the region, in particular if regionally significant infrastructure is a low or zero carbon development.</p>
<p><b>S100 Meridian Energy Limited</b></p>	<p>S100.014</p>	<p>Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans</p>	<p>Oppose in part</p>	<p>At a regional scale, the benefits of all infrastructure are relevant (not just 'low and zero carbon regionally significant infrastructure'). Also, the expression 'low and zero carbon regionally significant infrastructure' is not a defined term in the RPS and it is not necessary to use this expression.</p> <p>Renewable electricity generation is, by definition in the RPS, a subset of regionally significant infrastructure.</p> <p>To give effect to Objectives CC.1 and CC.3, and other objectives of the RPS, Policy 7 needs to explicitly enable the development of additional renewable energy to facilitate the transition from fossil fuel dependence to reliance on renewable energy. It is not enough that the proposed amendments to Policy 11 enable the development of domestic and small scale renewable electricity generation. The RPS needs to enable all scales of renewable electricity generation, if the outcomes sought by RPS Change #1 are to be achieved.</p>	<p>Policy 7: <b>Enabling the reduction in reliance on fossil fuels and Recognising the benefits from of renewable energy and regionally significant infrastructure including renewable electricity generation</b> - regional and district plans                      District and regional plans shall include policies and/or methods that recognise:                      (a) <b>recognise and enable</b> the social, economic, cultural and environmental benefits of regionally significant infrastructure, <del>and in particular low and zero carbon regionally significant infrastructure</del>                      including:                      (i) <b>the ability for people and goods to can travel to, from and around the region efficiently and safely using a range of travel modes, including travel modes that do not rely on fossil fuels;</b></p>



Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>As a consequence, the title of Policy 7 will need amendment to match the amended text of the policy.</p> <p>Text amendments are also necessary to rationalise the structure and grammar of the policy.</p>	<p>(ii) <b>the contribution of regionally significant infrastructure to the transition from fossil fuel dependence to reliance on renewable energy and in ways that support transitioning to low or zero carbon multi-modal travel modes;</b></p> <p>(iii) <b>the public health and safety benefits of providing is maintained through the provision of essential services:— including the supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</b></p> <p>(iv) <b>the economic, social and cultural well-being derived from people have having access to energy generated from renewable sources, and preferably low or zero carbon energy, so as to meet their needs; and</b></p> <p>(v) <del>people have</del> access <b>by people and communities</b> to telecommunication services.</p> <p>(b) <b>recognise and enable</b> the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</p> <p>(i) <b>reduced dependence on fossil fuels and imported energy resources and the contribution to transitioning to a low emission economy;</b></p> <p>(ii) <b>enhanced</b> security of supply and diversification of our energy sources; <b>and</b>(iii)  <del>reducing dependency on imported energy resources; and</del></p> <p>(iv) <del>reducing</del> <b>reduced</b> greenhouse gas emissions.</p> <p>Explanation <del>Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding</del></p>

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

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S113 Wellington Water</b>	S113.015	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support in part	<p>The RPS needs to enable consideration of local and regional benefits, functional and operational need and adverse effects a case by case basis to determine what is appropriate in any particular circumstances.</p> <p>It will be very difficult for infrastructure providers to achieve Te Mana o te Wai, support growth, manage biodiversity, provide resilience for climate change and manage natural hazard risks if appropriate planning pathways are not provided in District and Regional Plans.</p> <p>The reference to low or zero carbon infrastructure in clause (a) creates a third tier of infrastructure to the detriment of regionally significant infrastructure.</p>	<p>Amend the Policy as follows: District and regional plans shall include objectives, policies and/or methods that recognise: (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, <del>and in particular, low and zero carbon regionally significant infrastructure</del>, including: ... (iv) people have access to telecommunication services. <b>including by providing appropriate planning pathways for delivering the benefits.</b> ....</p>
<b>S115 Hutt City Council</b>	S115.033	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	No reasons provided	Retain as notified
<b>S117 Sustainable Electricity Association of New Zealand (SEANZ)</b>	S117.003	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure	Support	<p>The section 32 evaluation for "climate change and energy" refers to three options. "Option 3" has not been specifically developed but is said to be aimed at increasing "stringency of the provisions and require implementation in the medium term". The s32 evaluation identifies that "The costs of option 3 are low, however the benefits would potentially achieve the greatest benefit to society". SEANZ supports that general intent and wishes to see it properly developed as a package of provisions. SEANZ also notes that</p>	<p>The section 32 evaluation for "climate change and energy" refers to three options. "Option 3" has not been specifically developed but is said to be aimed at increasing "stringency of the provisions and require implementation in the medium term". The s32 evaluation identifies that "The costs of option 3 are low, however the benefits would potentially achieve the greatest benefit to society". SEANZ supports that general intent and wishes to see it properly developed as a package of provisions. SEANZ also notes that Option 3 is more consistent than the 'preferred option' with giving effect to 3.1A, Policy 7,</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		re - regional and district plans		Option 3 is more consistent than the 'preferred option' with giving effect to 3.1A, Policy 7, Policy 39, Policy 11, and the "CC" policies.	Policy 39, Policy 11, and the "CC" policies.
<b>S124 KiwiRail Holdings Limited</b>	S124.005	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	KiwiRail supports the amendments to Policy 7 and the policy explanation. Recognition of the benefits of regionally significant infrastructure, particularly where it contributes to reducing greenhouse gas emissions, is supported by KiwiRail.	Retain as notified.
<b>S129 Waka Kotahi NZ Transport Agency</b>	S129.017	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Supports the recognition of the benefits of renewable energy and regionally significant infrastructure, however consideration of local and regional benefits, functional and operational need and adverse effects need to be considered on a case by case basis to determine what is appropriate in any particular circumstances.	Retain as notified to enable adequate consideration of regionally significant infrastructure in a District context.
<b>S131 Ātiawa ki Whakarongotai Charitable Trust</b>	S131.056	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure	Support	Ātiawa supports the amendments to Policy 7, particularly the intent to transition to low or zero carbon energy and infrastructure. Insert the words, 'national' and 'regional' to make it clear at what level these benefits occur.	Amend to: Explanation Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits <b>at both the regional and national scale both within and outside the region</b> , in particular if regionally significant

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		re - regional and district plans			infrastructure is a low or zero carbon development
<b>S133 Muaūpoko Tribal Authority</b>	S133.056	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
<b>S134 Powerco Limited</b>	S134.009	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Oppose	<p>The reference to 'low and zero carbon regionally significant infrastructure' creates a third tier of infrastructure, which potentially undermines the term regionally significant infrastructure and is not supported.</p> <p>Recognition and provision needs to be made for investment in all existing regionally significant infrastructure, including infrastructure that is not low or zero carbon, such as gas distribution network. There will continue to be a role for such infrastructure, including in terms of diversity in energy sources, at least during a transition to low carbon energy provision. The preference for low or zero carbon energy provision in clause (a)(iii) could potentially undermine the ability to maintain the security of supply provided by existing carbon based infrastructure networks and this wording is not supported.</p>	<p>Amend Policy 7 to ensure appropriate recognition and provision for all types of regionally significant infrastructure. This could be achieved by making changes along the following lines:</p> <p>"District and regional plans shall include policies and/or methods that recognise: (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, <del>and in particular low and zero carbon regionally significant infrastructure</del> including:</p> <p>(i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to low or zero carbon multi modal travel modes;</p> <p>(ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</p> <p>(iii) people have access to energy, <del>and preferably</del> <b>including</b> low or zero carbon energy, so as to meet their needs; and</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					..."
<b>S140 Wellington City Council (WCC)</b>	S140.035	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Support as proposed.	Retain as notified.
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.031	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Oppose in part	WIAL supports the policy in so far as it seeks to recognise the social, economic, cultural and environmental benefits of regionally significant infrastructure. However, the addition of "in particular low and zero carbon regionally significant infrastructure" is vague and it appears to elevate or potentially prioritise this type of infrastructure over all other types of regionally significant infrastructure. This would be inappropriate and as discussed above it is critically important that the RPS protects existing regionally significant infrastructure from the adverse effects of climate change and should include sufficient flexibility to adapt and respond to the challenges (and opportunities e.g. developing localised renewable energy generation facilities) climate change will present.	Delete reference in paragraph (a) to "in particular low and zero carbon regionally significant infrastructure" and in paragraph (a)(ii) at the end of this subparagraph to "including Wellington International Airport" in this policy .
<b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b>	S157.011	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure	Oppose	The reference to 'low and zero carbon regionally significant infrastructure' creates a third tier of infrastructure, which potentially undermines the term regionally significant infrastructure and is not supported. Recognition and provision needs to be made for investment in all existing regionally significant infrastructure, including infrastructure that is not low or zero carbon, such as regionally significant bulk fuel supply infrastructure. There will continue to be a role for	Amend Policy 7 to ensure appropriate recognition and provision for all types of regionally significant infrastructure. This could be achieved by making changes along the following lines: (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, <del>and in particular low and zero carbon regionally significant infrastructure</del> including: ....

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		re - regional and district plans		such infrastructure, including in terms of diversity in energy sources, at least during a transition to low carbon energy provision. The preference for low or zero carbon energy provision in clause (a)(iii) could potentially undermine the ability to maintain the security of supply provided by existing carbon based infrastructure networks and this wording is not supported.	(iii) people have access to energy, <del>and preferably</del> <b>including</b> low or zero carbon energy, so as to meet their needs; and
<b>S162 Winstone Aggregates</b>	S162.037	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure re - regional and district plans	Support in part	Winstone supports the intent of this policy but seeks an addition to recognise the benefits of regionally significant mineral resources and aggregate quarries. This is consistent with the outcome on appeal in the NRP Objectives 9 and 11.	Amend (a) The social, economic, cultural and environmental benefits of regionally significant infrastructure <b>and significant mineral resources</b> , and in particular low and zero carbon regionally significant infrastructure including <b>(v) a secure supply of aggregate is available for development within the region</b>
<b>S163 Wairarapa Federated Farmers</b>	S163.050	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure re - regional and district plans	Oppose	Defer to the full review of the RPS in 2024  Policy 7 and the definition of RSI include reference to municipal water supply and drinking water, but do not more widely recognise the critical role of water supply infrastructure across all regional sectors (including industry and primary production) and at all scales (regional, municipal, community, farm-scale). Refer to submission for more details.	That the amendments to Policy 7 be deleted
<b>S165 Royal Forest and Bird Protection Society of</b>	S165.043	Policy 7: Recognising the benefits from renewable	Support in part	This policy is poorly drafted. It refers "to low and zero carbon regionally significant infrastructure", which is unclear.	Replace "low and zero carbon regionally significant infrastructure" with "regionally significant infrastructure that contributes to the achievement of the greenhouse gas emission targets in Objective CC.1" Make consequential amendments to explanation.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>New Zealand Inc. (Forest &amp; Bird)</b>		energy and regionally significant infrastructure - regional and district plans			
<b>S166 Masterton District Council</b>	S166.022	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Not Stated / Neutral	Note that this is a significant affordability issue for our community.	Clarifications. Further clarity sought on how this will impact Tier 3 councils
<b>S167 Taranaki Whānui</b>	S167.070	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Taranaki Whānui supports the amendments to Policy 7.	Retain as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.021	Policy 7: Recognising the benefits from renewable	Support in part	The changes and amendments made in Policy 7 (a) and (a) (i) supporting a low or zero carbon system, Policy (i) (1), (2), and (3) are contributing to the status quo and might be doing more of the same. For instance, reducing fugitive GHGs from wastewater treatment plants and increasing the diversion of	The policy could re-shift focus on having no landfills.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		energy and regionally significant infrastructure - regional and district plans		wastewater sludge, requiring efficient municipal landfill gas systems. The RPS policy intention could encourage practitioners to transition to new and innovative systems- not doing more of the same. Allowing a more efficient landfill could be seen as improvement, but the policy could re-shift focus on having no landfills.	
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0138	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Support	Rangitāne o Wairarapa support the recognition of cultural benefits alongside social, economic and environmental deriving from regionally significant infrastructure and renewable energy resources, where access to and use of the infrastructure and renewable energy sources, and therefore the benefits generated, are equitable and achieve, social, economic, cultural and environmental well-being. Consideration of benefits, protection and location of these resources in decision-making is also supported.	Retain as notified.
<b>S16 Kāpiti Coast District Council</b>	S16.034	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Council supports GWRC taking responsibility for actions under this policy as they align with GWRC's functions under section 30 of the RMA. Council requests responsibility for the implementation of this policy remains with GWRC.	Retain
<b>S30 Porirua City Council</b>	S30.036	Policy 9: Promoting greenhouse gas emission reduction	Support	Council supports that the lead for this policy should be the Regional Transport Committee, and outcomes be delivered through the Regional Land Transport Plan. Noting that affordability is a big issue for councils such as Council with a constrained rating base.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and uptake of low emission fuels - Regional Land Transport Plan			
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.031	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Support insofar as this relates to regional plans.	Retain provisions as notified.
<b>S115 Hutt City Council</b>	S115.034	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Support as proposed, note our comments on proposed new Policy CC.1 that the Regional Land Transport Plan is a useful tool to achieve the relevant objectives.	Retain as notified.
<b>S129 Waka Kotahi NZ Transport Agency</b>	S129.018	Policy 9: Promoting greenhouse gas emission reduction	Support in part	Generally supports Policy 9 and the promotion of a shift to low emission fuels. The current wording can be interpreted to suggest that the onus falls on transport infrastructure providers, like Waka Kotahi, to provide the incentives to achieve the outcomes of this method.	Seeks further clarification with regard to how the RPS will direct the shift to greenhouse gas reduction and low emission fuels.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and uptake of low emission fuels - Regional Land Transport Plan			
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.057	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	In principle Ātiawa supports Policy 9.	Retain as notified.
<b>S133 Muaūpoko Tribal Authority</b>	S133.057	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
<b>S137 Greater Wellington Regional Council (GWRC)</b>	S137.014	Policy 9: Promoting greenhouse gas emission reduction	Support in part	Proposed RPS Change 1 as notified does not specifically address public transport vehicle fleets reducing emissions, which is identified as an outcome in Objective CC.3 seeks (among other things) that public transport emissions are reduced by 20% from 2018 levels. However, there is no policy or method to	Amend Policy 9 as follows: The Wellington Regional Land Transport Plan shall include objectives and policies that promote: ... (c) <b>increasing</b> the uptake of low emission or zero carbon fuels, biofuels and new technologies.; <b>and</b>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and uptake of low emission fuels - Regional Land Transport Plan		implement this part of the objective. Policy 9 and Method CC.10, which link to Objective CC.3, should be amended to reflect this outcome sought.	
<b>S137 Greater Wellington Regional Council (GWRC)</b>	S137.015	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support in part	Proposed RPS Change 1 as notified does not specifically address public transport vehicle fleets reducing emissions, which is identified as an outcome in Objective CC.3 seeks (among other things) that public transport emissions are reduced by 20% from 2018 levels. However, there is no policy or method to implement this part of the objective. Policy 9 and Method CC.10, which link to Objective CC.3, should be amended to reflect this outcome sought.	Insert new clause: <b>(d) the decarbonisation of the public transport vehicle fleet.</b>
<b>S140 Wellington City Council (WCC)</b>	S140.036	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Support as proposed, note our comments on proposed new Policy CC.2 that the Regional Land Transport Plan is a useful tool to create a Transport Demand Management Plan for the region or at least guidance for how to create one that will achieve the best outcomes for the region.	Amend Policy 9 as needed.
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.032	Policy 9: Promoting greenhouse gas emission reduction	Support	Support this policy on the basis that it is directed at land transportation requirements. WIAL also notes that it will take some time to transition to Sustainable Aviation Fuels. This was recognised in the Government's proposal to introduce a sustainable biofuels mandate. It is currently proposed that this	Ensure that this policy retains its focus on land transportation.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and uptake of low emission fuels - Regional Land Transport Plan		mandate would not include sustainable aviation fuels. This is to be addressed separately as it is recognised that there are currently technological barriers in decarbonising the aviation industry. As such, there is more uncertainty as the policy direction the Government will take in the aviation sector across future emission budgets. It would be inappropriate for the RPS to be inconsistent with this national level policy.	
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.044	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support in part	The policy provides for a reduction but is not linked to the specific reductions sought in Objective CC.3	Amend so that reductions provided for in the policy are linked to the reductions identified in Objective CC.3.
<b>S166 Masterton District Council</b>	S166.023	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support in part	Agree in principle - but further clarity is required regarding how this will work for Tier 3 Councils.	Retain as notified. However: further clarity is required regarding how this will work for Tier 3 Councils.
<b>S167 Taranaki Whānui</b>	S167.071	Policy 9: Promoting greenhouse gas emission	Support	Taranaki Whānui supports the amendments to Policy 9.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		reduction and uptake of low emission fuels - Regional Land Transport Plan			
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.022	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Oppose in part	<p>The preparation of another plan (Regional Land Transport Plan) to give effect to Policy 9 dilutes the policy intent. It is unclear that as a higher order document, the RPS will be reconciled with a lower order document (Regional Land Transport Plan), which may not be binding, producing policies to give effect to policy 9.</p> <p>The wording also 'promotes reduction', it is more cost-effective to reduce than promote, and why promote while we can be more directive to 'reduce'.</p>	Reword "promote reduction" to "reduce" in the policy
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0140	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Rangitāne o Wairarapa strongly support objectives and policies that promote reducing non-renewable fuel consumption, and transport-related GHG and pollutant emissions, and uptake of low emissions or zero-carbon fuel.	Retain as notified.
<b>S16 Kāpiti Coast District Council</b>	S16.035	Policy 10: Promoting travel demand management	Support	Council supports the deletion of this policy as a district plan cannot influence the use and consumption of non-renewable transport fuel, or carbon dioxide emissions from transportation.	Retain deletion of Policy 10.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		nt - district plans and the Regional Land Transport Strategy			
<b>S78 Beef + Lamb New Zealand Limited</b>	S78.009	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Not Stated / Neutral	Accepts- that the deletion of operative Policy 10 is required to give effect to the NPS-UD but neither supports nor opposes the deletion.	Delete as notified
<b>S115 Hutt City Council</b>	S115.035	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support	Support the deletion of this policy	Delete Policy 10 as proposed
<b>S131 Ātiawa ki Whakarongotai Charitable Trust</b>	S131.058	Policy 10: Promoting travel demand management - district plans and the Regional Land	Support		Ātiawa supports the deletion of Policy 10 as its content has been provided through Policy 9 and Policy CC.2 which better provide for climate change through greenhouse gas emission reductions from the transport industry.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		Transport Strategy			
<b>S140 Wellington City Council (WCC)</b>	S140.037	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support	Support deletion of this policy.	Retain as notified
<b>S158 Kāinga Ora Homes and Communities</b>	S158.017	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support	Supports the deletion of policy 10.	Support deletion.
<b>S166 Masterton District Council</b>	S166.024	Policy 10: Promoting travel demand management - district plans and the Regional Land Transport Strategy	Support in part	Agree in principle - but how will this work for Tier 3 Councils? Please clarify.	Retain as notified. However: further clarity is required regarding how this will work for Tier 3 Councils.
<b>S167 Taranaki Whānui</b>	S167.072	Policy 10: Promoting travel demand	Support		Retain as notified.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		managem nt - district plans and the Regional Land Transport Strategy			
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.024	Policy 10: Promoting travel demand managem nt - district plans and the Regional Land Transport Strategy	Support in part	<p>Detailed travel demand management plans would help us make aligned decisions while land use is being planned. The production of a travel demand management plan will be time and resource intensive. It is unclear, undertaking such exercise, just to 'promote' the reduction of using non-renewables and GHG emissions justifies the time and resource required to complete these plans.</p> <p>It is unclear whether they are secondary decision-making documents; should they be prepared to produce evidence for our reductions, or because they offer opportunity to change the way land is used, should they be directive rather than promotional and optional.</p>	Retain policy 10.
<b>S11 Outdoor Bliss Heather Blissett</b>	S11.002	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	<p>There still remains no provision for off-grid tiny houses or similar and yet throughout the entire country it is local councils that continue to be the barrier to their existence. Consider that this is due to no rateable value for tiny houses and not in Council's best interests to support.</p>	Amend as follows: <b>Implement Promoting and enabling energy efficient design and small scale renewable energy generation including small scale dwellings such as off grid tiny homes - district plans.</b>
<b>S16 Kāpiti Coast District Council</b>	S16.036	Policy 11: Promoting and enabling energy efficient	Support in part	<p>Council supports the support for small scale energy generation provisions within district plans that give effect to the NPS-REG 2011.</p> <p>However, when it comes promoting and enabling energy efficient design it is unclear how a district plan</p>	Delete district plan requirement to include the promotion and enablement of energy efficient design. Insert non-regulatory methods to promote energy efficient design.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		design and small scale renewable energy generation - district plans		<p>would promote and enable this. Council notes district plans do not prevent these activities from being carried out, and the energy efficiency of buildings is a market-led decision that cannot be regulated via a district plan under existing legislation.</p> <p>All buildings are required to meet district plan bulk and location requirements to manage adverse effects on the environment, regardless of whether they are energy efficient or not. Council considers non-regulatory methods such as design guidance and education would be more efficient and effective at meeting the objectives.</p> <p>Council also notes provisions in a district plan should only be included if including them can be proven to be the most efficient and effective method to achieve a particular objective. If it is not the most efficient and effective method, then the provision should not be in a district plan. Council notes the section 32 evaluation does not explore other options to achieve the relevant objective in detail.</p> <p>Council also notes it is a common misconception that a district plan controls all aspects of the use and development of the environment. However, this is not the case due to free-market factors and the decisions of individuals that a district plan cannot control or influence - such as the energy efficiency design of buildings or the type of vehicle and its emissions that individuals choose to purchase. We request amendments to remove all provisions that fit into this category.</p>	
<b>S25 Carterton District Council</b>	S25.022	Policy 11: Promoting and enabling energy efficient design and small scale renewable	Support	CDC supports this policy and notes that the draft Wairarapa Combined District Plan uses a different approach to defining small- and community-scale renewable electricity generation. The WCDP approach generally exceeds what is required by these amendments.	Retain the policy.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		energy generation - district plans			
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.029	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	<p>Council notes that some of these matters can extend beyond what can be achieved by district plans, especially when it comes to buildings and it is unclear how district plans are expected to promote energy efficient design.</p> <p>Some matters for buildings are more appropriately dealt with under the Building Act or via non-regulatory guidance.</p> <p>Councils is also concerned that there is an issue of scale of significance in respect of alterations to existing buildings. Some alterations to a residential building, for example, may require a consent but only because they have a minor breach of height in relation to boundary rules.</p> <p>In this case it is not reasonable or practical to apply clause b) in particular.</p>	Amend policy to delete reference to alterations to existing buildings or apply a threshold and delete reference to "promote".
<b>S63 Mary Beth Taylor</b>	S63.009	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	<p>Council must empower people to create and manage their own resources, especially water and energy. This can lead to greater resilience and sense of security if people know what they are currently doing, and what they can do to change their resource use profile.</p>	Include references to personal resource audits and other tools to raise awareness and use to create a PRMP (Personal Resource Management Plan).
<b>S63 Mary Beth Taylor</b>	S63.013	Policy 11: Promoting and enabling energy efficient	Support in part	<p>Municipal swimming pools must have roof top solar energy generation and/or solar hot water heating to reduce the high energy use for heating the water</p>	Amend policy to require that all appropriate council owned buildings must be considered as renewable energy generation sites.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		design and small scale renewable energy generation - district plans			
<b>S78 Beef + Lamb New Zealand Limited</b>	S78.010	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Not Stated / Neutral	Accepts that the amendments to operative Policy 11 are required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified
<b>S79 South Wairarapa District Council</b>	S79.027	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	The draft South Wairarapa District Plan will align with the language in the NPS. It is unclear why the RPS sets the standard that they do.	Amend Policy 11 to align with the definition of small and community scale in the National Policy Statement for Renewable Energy Generation (NPS REG).
<b>S83 CentrePort Limited</b>	S83.001	Policy 11: Promoting and enabling energy efficient design and small scale renewable	Support in part	Renewable energy generation should be enabled beyond 100kw to facilitate transition to low carbon economy	Enable renewable energy generation beyond 100kw (policy is limited to small scale generation and electricity only)

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		energy generation - district plans			
<b>S95 Tony Chad</b>	S95.008	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	Council must empower people to create and manage their own resources, especially water and energy. This can lead to greater resilience and sense of security if people know what they are currently doing, and what they can do to change their resource use profile.	Include references to personal resource audits and other tools to raise awareness and use to create a PRMP (Personal Resource Management Plan).
<b>S95 Tony Chad</b>	S95.013	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	Municipal swimming pools must have roof top solar energy generation and/or solar hot water heating to reduce the high energy use for heating the water.	Amend policy to require that all appropriate council owned buildings must be considered as renewable energy generation sites.
<b>S99 Genesis Energy Limited</b>	S99.002	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation	Support	The promotion and enabling of all forms of renewable energy generation is required to accelerate the climate change outcomes sought by RPS Change 1.	Retain Policy 11 as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		- district plans			
<b>S100 Meridian Energy Limited</b>	S100.015	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	The RPS needs to enable all scales of renewable electricity generation, if the outcomes sought by RPS Change #1 are to be achieved.	Retain as notified.
<b>S117 Sustainable Electricity Association of New Zealand (SEANZ)</b>	S117.005	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	Fails to fully give effect Objective 9. The section 32 evaluation for "climate change and energy" refers to three options. "Option 3" has not been specifically developed but is said to be aimed at increasing "stringency of the provisions and require implementation in the medium term". The s32 evaluation identifies that "The costs of option 3 are low, however the benefits would potentially achieve the greatest benefit to society". SEANZ supports that general intent and wishes to see it properly developed as a package of provisions. SEANZ also notes that Option 3 is more consistent than the 'preferred option' with giving effect to 3.1A, Policy 7, Policy 39, Policy 11, and the "CC" policies.	General support, but strengthen to give effect to 'Option 3' from the section 32 analysis.
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.059	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	Ātiawa supports the amendments to Policy 11.	Retain as notified.

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<b>Submitter</b>	<b>Submission Point</b>	<b>Provision</b>	<b>Stance</b>	<b>Reasons</b>	<b>Decision Requested</b>
<b>S133 Muaūpoko Tribal Authority</b>	S133.058	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.033	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	WIAL supports the policy in that it suitably seeks to enable the installation and use of smaller scale renewable energy generation facilities.	Retain this policy.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.045	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support		Retain
<b>S166 Masterton</b>	S166.025	Policy 11: Promoting and	Support	Agree - the review of the Wairarapa Combined District Plan will reflect this.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
District Council		enabling energy efficient design and small scale renewable energy generation - district plans			
<b>S167 Taranaki Whānui</b>	S167.073	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support	Taranaki Whānui supports the amendments to Policy 11.	Retain as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.025	Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation - district plans	Support in part	Policy 11 can be more directive in allowing District Plans to use more directive words for energy efficient designs for all new development.	The provision needs to be more directive with energy efficiency designs required for all new development.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0142	Policy 11: Promoting and enabling energy efficient	Support	Rangitāne o Wairarapa strongly support the promotion of energy efficient design and alterations (particularly in provision of affordable housing), and installation of community scale renewable energy schemes.	Retain as notified.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		design and small scale renewable energy generation - district plans			
<b>S16 Kāpiti Coast District Council</b>	S16.045	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Council supports GWRC's intent expressed in the policy on the condition implementing the policy via regulatory methods remains the responsibility of GWRC only.	Retain.
<b>S30 Porirua City Council</b>	S30.037	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Council supports that the lead for this policy should be the Regional Transport Committee, and outcomes be delivered through the Regional Land Transport Plan. Noting that affordability is a big issue for councils such as Porirua City Council with a constrained rating base.	Retain as notified.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.019	Policy EIW.1: Promoting affordable high quality active mode and	Support in part	Support insofar as it only applies to the RLTP.  This provides appropriate direction for the regional land transport plan, which in turn will support advocacy for the regional and territorial authorities to seek funding for public transport and active modes. However, we consider this should go further and this should be	Amend policy to read: "Policy EIW.1: Prioritising <del>Promoting</del> affordable high quality active mode and public transport services - Regional Land Transport Plan The Wellington Regional Land Transport Plan shall include objectives, policies and methods that prioritise

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		public transport services - Regional Land Transport Plan		prioritised not only promoted.  Council notes however, that the implementation of which may be difficult to achieve and will require engagement with Waka Kotahi and KiwiRail for efficient regional planning for Wellington.	<del>promote</del> equitable....."
<b>S115 Hutt City Council</b>	S115.036	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Support as proposed, note our comments on proposed new Policy CC.1 that the Regional Land Transport Plan is a useful tool to achieve the relevant objectives.	Retain as notified
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.060	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Ātiawa supports Policy EIW.1. Ātiawa recognises the impacts of the transport industry on climate change. Ātiawa seeks that Regional Council actively work with a range of people who represent all capabilities, abilities, and minorities to develop the Regional Land Transport Plan to ensure that the transportation needs reflect all parts of the community, including the most vulnerable, whilst reducing greenhouse gas emissions.	Ātiawa recognises the impacts of the transport industry on climate change. Ātiawa seeks that Regional Council actively work with a range of people who represent all capabilities, abilities, and minorities to develop the Regional Land Transport Plan to ensure that the transportation needs reflect all parts of the community, including the most vulnerable, whilst reducing greenhouse gas emissions.
<b>S133 Muaūpoko Tribal Authority</b>	S133.054	Policy EIW.1: Promoting affordable high quality active mode and	Support	Support the inclusion of this policy.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		public transport services - Regional Land Transport Plan			
<b>S137 Greater Wellington Regional Council (GWRC)</b>	S137.017	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support in part	Amendments are required to improve readability and clarity.	Amend Policy EIW.1 as follows: The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle., <del>by contributing to reducing greenhouse emissions.</del>
<b>S140 Wellington City Council (WCC)</b>	S140.038	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Support as proposed.	Retain as notified.
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.034	Policy EIW.1: Promoting affordable high quality active mode and	Support in part	WIAL supports initiatives to be contained within the Regional Land Transport Plan to assist in facilitating high quality active mode infrastructure and affordable public transport services with sufficient frequency. WIAL is however concerned that it may be unrealistic as an outcome within the RPS to expect that people will be able to live without the need to have access to a	Delete the expectation that people will live without the need to access a private vehicle. Amend as follows: The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		public transport services - Regional Land Transport Plan		private vehicle. WIAL also submits that the current structure of the policy does not make grammatical sense and the last part should be deleted.	and connectedness., <del>including between modes, for people to live in urban areas without the need to have access to a private vehicle, by contributing to reducing greenhouse emissions.</del>
<b>S158 Kāinga Ora Homes and Communities</b>	S158.018	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	Supports this policy and in particular the requirement that the Regional Land Transport Plan includes provisions that promote equitable and accessible high quality active mode infrastructure	Retain as notified.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.046	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support in part	The intent of the policy is supported but the drafting is poor, in particular the concluding words "by contributing to reducing greenhouse emissions" do not make sense	The Wellington Regional Land Transport Plan shall include objectives, policies and methods that achieve <b>the greenhouse emission targets in Objective CC.3</b> , <del>give effect to</del> the promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle, <del>by contributing to reducing greenhouse emissions.</del>
<b>S166 Masterton District Council</b>	S166.056	Policy EIW.1: Promoting affordable high quality active mode and	Support in part	Agree in principle - but how will this work for Tier 3 Councils?	Retain as notified. However: Further clarity sought on how this will impact Tier 3 councils.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		public transport services - Regional Land Transport Plan			
<b>S167 Taranaki Whānui</b>	S167.074	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support	<p>Taranaki Whānui supports the inclusion of this new policy. We note in particular the aim for equity and accessibility.</p> <p>Lower-decile areas (including Māori) have been historically disadvantaged by the public transport system.</p>	Retain as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.023	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Support in part	<p>The intent of the policy is supported - however we are conscious a variety of infrastructure is needed to be present to align, to make this happen. Without needing to own a private vehicle is a significant statement, where for affordable high quality active mode and car share infrastructure, and public transport services may not be available for our communities. We need to ensure that the policy intention is not disadvantaging our communities.</p>	<p>Reword the policy to include sentences to read:<b>Regional Land Transport Plan should provide detail frameworks how this can be implemented with iwi partners and ensure a detailed co-design is worked with Tangata Whenua.</b></p>
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0135	Policy EIW.1: Promoting affordable high quality active mode and	Support	<p>Rangitāne o Wairarapa strongly support the promotion of equitable public transport and active modes which are connected, accessible, affordable, supported by extensive multi modal infrastructure and services.</p>	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		public transport services - Regional Land Transport Plan			
<b>S16 Kāpiti Coast District Council</b>	S16.037	Policy 12: Management of water bodies - regional plans	Support	Council notes the amendments to the policy give effect to the NPS- FM.	Retain
<b>S16 Kāpiti Coast District Council</b>	S16.047	Policy 12: Management of water bodies - regional plans	Support	Council agrees the management of waterbodies, other than activities carried out on their surface, is a role best filled by GWRC as it has the expertise and clear management responsibility under the RMA for the maintenance and enhancement of the quality of water, the maintenance of the quantity of water in waterbodies, the maintenance and enhancement of ecosystems in water bodies, the control of the taking, use, damming and diversion of water, and the control of discharges of contaminants into water.	Retain
<b>S30 Porirua City Council</b>	S30.038	Policy 12: Management of water bodies - regional plans	Support in part	<p>Council supports that these matters are addressed in a regional plan in accordance with the regional council's s30 functions.</p> <p>However, this policy unnecessarily duplicates requirements set out already in the NPS- FM, the role of an RPS should be to articulate what national direction means at a regional level. It is unclear what value is added by the inclusion of this policy.</p> <p>Also, clause (g) specifies a method which is not required as this is already listed in the chapeau of the policy.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: Regional plans shall give effect to <i>Te Mana o te Wai</i> and include objectives, policies, rules and/or methods that:</p> <p>(a) are prepared in partnership with mana whenua/ tangata whenua;</p> <p>(b) achieve the long-term visions for freshwater;</p> <p>(c) identify freshwater management units (FMUs);</p> <p>(d) identify values for every FMU and environmental outcomes for these as objectives;</p> <p>(e) identify target attribute states that achieve environmental outcomes, and record their baseline</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					state; (f) set environmental flows and levels that will achieve environmental outcomes and long-term visions; (g) identify limits on resource use including take limits that will achieve the target attribute states, flows and levels and include these as rules; (h) identify non-regulatory actions that will be included in Action Plans that will assist in achieving target attribute states (in addition to limits); and (i) identify non-regulatory and regulatory actions in Action Plans required by the NPS-FM
<b>S32 Director-General of Conservation</b>	S32.011	Policy 12: Management of water bodies - regional plans	Support in part	The proposed changes to this policy are appropriate as part of giving effect to the NPSFM 2020. However, they do not in themselves give complete effect, and the section references in the explanation are incomplete.	Retain the Policy as notified and make the following changes to the associated new explanation, or words to like effect: "Policy 12 <b>gives sets out key elements of giving effect to the national direction set by the National Policy Statement for Freshwater Management 2020, including sections 2.2, 3.2 and 3.8-3.17.</b> "
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.055	Policy 12: Management of water bodies - regional plans	Support in part	Council supports the intent of the policy to implement Te Mana o Te Wai.  It is unclear what outcomes and visions need to be achieved under clause f)  Council notes that the policy states regional plans will identify target attribute state, however it is unclear if/how district plans are expected to respond and enforce these targets under Policy 15, and in response to action plans required by 3.12 of the NPS-FM.	Amend to provide more clarity on clause g) and the application of the policy.
<b>S102 Te Tumu Paeroa  </b>	S102.044	Policy 12: Management of water	Support in part	Generally supports policy 12 in the 'Freshwater' chapter. However, to ensure tino rangatiratanga is	Amend Policy 12 subclause (a) as follows: (a) are prepared in partnership with mana whenua / tangata whenua <b>and affected Māori landowners;</b>

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Office of the Māori Trustee		bodies - regional plans		exercised appropriately, affected Māori landowners should be included in the partnership.	
S115 Hutt City Council	S115.037	Policy 12: Management of water bodies - regional plans	Support in part	The policy simply restates the direction of the National Policy Statement for Freshwater. We suggest redrafting the policy to apply it in the regional context.	Redraft Policy to apply higher order direction in the regional context.
S128 Horticulture New Zealand	S128.025	Policy 12: Management of water bodies - regional plans	Support in part	<p>The policy in essence restates the requirements of the NPSFM 2020, however risks not capturing the full context.</p> <p>The amendment to (b) is sought to recognise that the NPSFM 2020 provides for the long-term visions for freshwater to be intergenerational. The changes to the NRP may only be one step along that journey in some cases (e.g. there can be interim target attribute states).</p> <p>Target attribute states and environmental flows and levels must be set in a way that will achieve the long-term vision.</p> <p>Limit setting must have regard to the long-term vision.</p>	<p>Amend Policy 12, to refer more generally to the regional plan implementing the requirements of the NPSFM 2020,</p> <p>OR</p> <p>Amend subclause (b) Achieve, <b>or contribute to achieving</b>, the long-term visions for freshwater;</p>
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.061	Policy 12: Management of water bodies - regional plans	Support in part	<p>In principle Ātiawa supports Policy 12, we support giving effect to Te Mana o te Wai, which is a statutory obligation, we are pleased that this policy sets out a clear framework for implementing the NPS-FM. Ātiawa seeks reference to mātauranga Māori to enable 'ki te tirohanga Māori'/Māori world view, values and systems, knowledge to be applied to freshwater management. The application of mātauranga Māori is provided for in the NPS-FM.</p> <p>In addition, Ātiawa seek reference to ki uta ki tai, an integrated approach is included as a subclause to Policy 12. Ātiawa has identified in our</p>	<p>Amend to:</p> <p>Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, rules and/or methods that:</p> <p>(a) are prepared in partnership with mana whenua / tangata whenua;<b>(aa) enable the application of mātauranga Māori;(ab) adopt an integrated approach, ki uta ki tai;</b></p> <p>(b) achieve the long-term visions for freshwater;</p> <p>(c) identify freshwater management units (FMUs);</p> <p>(d) identify values for every FMU and environmental outcomes for these as objectives;</p> <p>(e) identify target attribute states that achieve environmental outcomes, and record their baseline</p>



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>Kaitiakitanga Plan the value of natural order and balance; that the health of one component of the environment can not be understood in isolation from the whole, that all things are connected and that the well-being of the whole always has to be the frame within which kaitiakitanga is actioned. Freshwater must therefore be managed using a ki uta ki tai, an integrated approach, it is well understood that one part of the water cycle affects another - fragmented and piecemeal approaches to freshwater management only provide localised outcomes, or at times fail to achieve any meaningful improvement as they fail to address the key driver of poor freshwater quality and quantity. Ki uta ki tai must be applied to freshwater management to give effect to Te Mana o te Wai and in implementing the NPS-FM, and therefore create meaningful and measurable improvement to freshwater quality and quantity in the region. Ātiawa notes that Te Mana o te Wai can only be interpreted by mana whenua, Ātiawa are yet to complete the process to contextualise this concept for our rohe. This process will occur concurrently to RPS Change 1. Therefore, further changes to the RPS will be required to give effect to Ātiawa interpretation of Te Mana o te Wai at the appropriate time.</p>	<p>state;                      (f) set environmental flows and levels that will achieve environmental outcomes and long-term visions;                      (g) identify limits on resource use including take limits that will achieve the target attribute states, flows and levels and include these as rules;                      (h) identify non-regulatory actions that will be included in Action Plans that will assist in achieving target attribute states (in addition to limits); and                      (i) identify non-regulatory and regulatory actions in Actions Plans required by the NPS-FM</p>
<p><b>S133                      Muaūpoko                      Tribal                      Authority</b></p>	<p>S133.006</p>	<p>Policy 12:                      Managem                      ent of water                      bodies -                      regional                      plans</p>	<p>Oppose                      in part</p>	<p>Supports the intent of this policy, particularly the partnership directive with mana whenua/tangata whenua. However, there are several amendments required to ensure it gives effect to Te Mana o te Wai and the NPSFM 2020. Long-terms visions and FMUs should be set out in the RPS, not the Regional Plan. Does not agree that whaitua are appropriate areas to</p>	<p>Amend the RPS to:</p> <ul style="list-style-type: none"> <li>• clarify the process identify FMUs</li> <li>• provide a policy or method to identify and define FMUs</li> <li>• provide a policy or method to identify (if present): sites to be used for monitoring, primary contact sites, the location of habitats of threatened species, outstanding water bodies, and natural inland wetlands.</li> </ul>

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				<p>identify freshwater management units.</p> <p>The NPSFM section 3.8 (3) also requires regional councils to identify (if present):</p> <ul style="list-style-type: none"> <li>• sites to be used for monitoring</li> <li>• primary contact sites</li> <li>• the location of habitats of threatened species</li> <li>• outstanding water bodies</li> <li>• natural inland wetlands.</li> </ul>	Ensure Muaūpoko is given the opportunity to partner with GWRC for these processes.
<b>S144 Sustainable Wairarapa Inc</b>	S144.037	Policy 12: Management of water bodies - regional plans	Support	Needed in order to give effect to the NPS for FM	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.008	Policy 12: Management of water bodies - regional plans	Support in part	<p>Strongly support the proposed changes to Policy 12 to give effect to the NPS-FM.</p> <p>However, Proposed Change 1 does not incorporate a long-term vision for freshwater as set out in Section 3.3 of the NPS-FM. In the absence of a clear long-term vision in the RPS it is not clear how paragraph (b) of the proposed changes to Policy 12 will operate.</p>	Seek clarification of paragraph (b): "achieve the long-term visions for freshwater;".
<b>S163 Wairarapa Federated Farmers</b>	S163.052	Policy 12: Management of water bodies - regional plans	Oppose	<p>Defer to full review of the RPS in 2024</p> <p>Refer to submission for more detail on partnership principles.</p>	That the amendments to Policy 12 be deleted
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.047	Policy 12: Management of water bodies - regional plans	Support in part	While the intent of this policy is supported, there is a risk that paraphrasing the implementation requirements of the NPSFM will change their meaning. The policy needs to be clear that the NPSFM requirements remain paramount, despite the paraphrasing in this policy.	<p>Amend the policy:</p> <p>Regional plans shall give effect to Te Mana o te Wai <b>and the implementation requirements of the NPSFM</b>, and include objectives, policies, rules and/or methods that: Add a note at the bottom of the policy:<b>Where there is a difference between the listed requirements above and those of the NPSFM, the NPSFM will prevail.</b></p> <p>Make any further amendments to ensure Part 3 of the NPSFM is given effect to.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S167 Taranaki Whānui</b>	S167.075	Policy 12: Managem ent of water bodies - regional plans	Support	Taranaki Whānui supports the amendments to Policy 12. We are keen to see clear statements around the resourcing/funding and capability building of mana whenua in this partnership (Method FW.1)	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.036	Policy 12: Managem ent of water bodies - regional plans	Oppose in part	<p>Rangitāne o Wairarapa support the intent of this policy, in particular that objectives, policies, rules and or methods will be prepared in partnership with tangata whenua. However, we have several concerns about the provision as currently drafted.</p> <p>The provision essentially paraphrases the NPS, sometimes inaccurately, including in relation to the sequence of steps that must be followed, which is not particularly helpful. The provision also does not provide any additional direction at the regional level.</p> <p>Long term visions must be set out in the RPS. Practically, the FMUs must also be identified in the RPS, rather than the Regional Plan, as the long-term visions relate to the FMUs. There is a sequencing issue with clause b and c. FMUs must be identified before long-term visions can be developed.</p>	Amend the policy: So that it is clear that FMUs will be identified in the RPS, and will be identified as a first step, before the development of the long-term visions, and that this will occur before the regional plan is made or modified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.037	Policy 12: Managem ent of water bodies - regional plans	Oppose in part	<p>Rangitāne do not agree that the whaitua are appropriate to be defined as FMUs Long term visions must be set out in the RPS. Practically, the FMUs must also be identified in the RPS, rather than the Regional Plan, as the long-term visions relate to the FMUs.</p> <p>There is a sequencing issue with clause b and c. FMUs must be identified before long-term visions can be developed. Rangitāne do not agree that the whaitua are appropriate to be defined as FMUs. Values, land uses, geology, climate influence parts of those whaitua differently and the management responses may need to be different in those different areas. Rangitāne o Wairarapa note their position here that it is important that values for each of the FMUs are defined, rather than relying on a broad, generic set of values.</p> <p>In addition, if FMUs are being identified, clause 3.8 of the NPS FM directs that regional councils must also</p>	To correctly reference the sequence of steps in the NOF process in the NPS FM (clause e). The sequence should be to firstly identify attributes, then record the baseline state, and then set target attributes that achieve the environmental outcome and long-term visions. Amend clause (e) so that this order of events is clear and reflects the NPS FM.

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				identify, if they are present: monitoring sites, primary contact sites, the location of habitats of threatened species, outstanding water bodies and natural inland wetlands within the FMUs. When will these matters be addressed and incorporated into the RPS? The section 32 report is silent on this.	
<b>S169 Kahungunu Ki Wairarapa</b>	S169.007	Policy 12: Management of water bodies - regional plans	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
<b>S170 Te Rūnanga o Toa Rangitira</b>	S170.026	Policy 12: Management of water bodies - regional plans	Support in part	This policy does not make clear whose objectives that we are setting our vision for. Tangata Whenua objectives are not the same with the communities', the Crown's, or the Councils'. There are not clauses that mention Mana Whenua identifies Freshwater Management Units (FMUs), environmental flows, environmental outcomes, and limits co-designing with the Council.  FMUs need to align with Sites of Significance to iwi and Māori, and this has not been mentioned or referred to in this Policy.	All sub-clauses could be re-phrased to say ' <b>co-designed with Mana Whenua</b> '
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0198	Policy 12: Management of water bodies - regional plans	Oppose in part	Rangitāne do not agree that the whitua are appropriate to be defined as FMUs. Values, land uses, geology, climate influence parts of those whitua differently and the management responses may need to be different in those different areas. Rangitāne o Wairarapa note their position here that it is important that values for each of the FMUs are defined, rather than relying on a broad, generic set of values.	Amend the RPS to provide a policy or method which explains how the FMUs will be identified and defined in partnership with tangata whenua, along with the associated long-term visions; and how these matters will be incorporated in the RPS (for example through a future plan change). It is not appropriate to rely on the s32 report to explain this.
<b>S168 Rangitāne O</b>	S168.0199	Policy 12: Management of water	Oppose in part	In addition, if FMUs are being identified, clause 3.8 of the NPS FM directs that regional councils must also identify, if they are present: monitoring sites, primary	Rangitāne o Wairarapa seek that the FMUs are identified in the RPS and take into account tangata whenua mātauranga when defining them. The Whitua's are too large to be defined as

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<b>Wairarapa Inc</b>		bodies - regional plans		<p>contact sites, the location of habitats of threatened species, outstanding water bodies and natural inland wetlands within the FMUs. When will these matters be addressed and incorporated into the RPS? The section 32 report is silent on this.</p> <p>Clause (e) confuses several steps in the NOF process and this needs to be corrected.</p> <p>As whānau, hapū and Iwi - Rangitāne o Wairarapa, our wai is our top priority and we want to be the leading authority for this policy.</p>	<p>FMUs.</p> <p>The new policy or method must explain how items within each FMU listed in clause 3.8 of the NPS FM will be identified (monitoring sites, primary contact sites, the location of habitats of threatened species, outstanding water bodies and natural inland wetlands). Rangitāne o Wairarapa must be involved in this process of identification.</p> <p>We want to be the leading authority for this policy.</p>
<b>S32 Director-General of Conservation</b>	S32.012	Policy 13: Allocating water - regional plans	Oppose	The reason given for proposing deletion of this Policy is that it is covered by the proposed Policy 12. However, Policy 12 focusses on process rather than outcomes, whereas the existing Policy 13 provides specific guidance to take account of aquatic ecosystem health and saltwater intrusion.	Decline the proposed change and retain the operative version of Policy 13.
<b>S115 Hutt City Council</b>	S115.038	Policy 13: Allocating water - regional plans	Support	Support deletion as proposed	Delete Policy 13 as proposed
<b>S131 Ātiawa ki Whakarongotai Charitable Trust</b>	S131.062	Policy 13: Allocating water - regional plans	Support	Ātiawa supports the proposed deletion of Policy 13, given that water allocation will be addressed through new policies introduced as part of RPS Change 1 in accordance with the national direction to assess environmental flows and levels and identify take limits. Ātiawa look forward to addressing this important and sensitive issue through the Whaitua o Kāpiti process.	Retain proposed deletion.
<b>S140 Wellington City Council (WCC)</b>	S140.039	Policy 13: Allocating water - regional plans	Support	Support as proposed.	Retain as notified.
<b>S165 Royal Forest and Bird</b>	S165.048	Policy 13: Allocating water -	Support	Support deletion of outdated policy	Support deletion

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Protection Society of New Zealand Inc. (Forest & Bird)		regional plans			
S167 Taranaki Whānui	S167.076	Policy 13: Allocating water - regional plans	Support		Retain as notified.
S16 Kāpiti Coast District Council	S16.048	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>Council notes the management of all the listed actions in the policy fall under the statutory functions of regional councils under the RMA. This being the case GWRC can include regulatory methods in its regional plan(s) to require and manage these actions. This could be achieved via making amendments to relevant PNRP rules to give effect to the NPS-FM and NPS-UD such as Rule R50: Stormwater from new subdivision and development. Council requests the actions that are directly relevant to urban development and subdivision design are developed by GWRC in collaboration with the technical experts of the city and district councils in the region.</p> <p>Council notes clause (k) of the policy implies that stormwater systems generate contaminants, however this is not the case. Stormwater systems transport contaminants and it is important this distinction is made clear. Council also notes stormwater systems transport contaminants from many sources that are beyond the control of city and district councils who own stormwater infrastructure - such as contaminants from vehicles using roads, private carparks, and any unlawful discharges made by persons to the stormwater network via stormwater grates in roads etc. Whilst Council supports the inclusion of to the extent practicable in the policy, we consider clause (k) is founded on a misconception of how stormwater networks function, and with who responsibility for contaminants within stormwater sits.</p>	Amend as follows: (k) Require stormwater quality management that will minimise the <del>generation-transportation</del> of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater; and

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<p><b>S30</b> <b>Porirua</b> <b>City</b> <b>Council</b></p>	<p>S30.039</p>	<p>Policy 14: Urban developme nt effects on freshwater and the coastal marine area - regional plans</p>	<p>Support in part</p>	<p>Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions.</p> <p>Council generally supports the intent of this policy. However, this policy needs to be drafted as a policy rather than a statement, and listed items need to grammatically link to the chapeau of the policy. It also duplicates a number of other policies in the RPS, for example, clause (e) duplicates Policy 15, clause (i) duplicates (and is inconsistent with) Policy 18(o).</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: Regional plans <b>shall include</b> objectives, policies, <b>rules</b> and methods—including rules, must that give effect to <b><i>Te Mana o te Wai</i></b> and in doing so must:</p> <p>(a) Enable the active involvement of mana whenua/ tangata whenua in freshwater management (including decision-making processes); and</p> <p>(b) <b>Identify and provide for</b> Māori freshwater values <del>are identified and provided for</del>;</p> <p>(c) Require the control of both land use and discharge effects from the use and development of land on freshwater and the coastal marine area;</p> <p>(d) Achieve the target attribute states set for the catchment;</p> <p>(e) Require the development, including stormwater discharges, <del>earthworks and vegetation clearance</del> meet any limits set in a regional plan;</p> <p>(f) Require that urban development is designed and constructed using the principles of Water Sensitive Urban Design;</p> <p>(g) Require that urban development located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours;</p> <p>(h) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; (i) <del>Require riparian buffers for all water bodies and avoid to the piping of rivers;</del></p> <p>(j) Require <i>hydrological controls</i> to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural</p>

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					stream flows; (k) Require stormwater quality management that will minimise the generation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater; and Identify and map rivers and wetlands.
<b>S32 Director-General of Conservation</b>	S32.013	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area.  They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.	Retain as notified, except for the following changes or words to like effect: (h) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins <del>and</del> estuaries <b>and the coastal marine area;</b>
<b>S32 Director-General of Conservation</b>	S32.026	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area.  They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.	Add a new subclause: <b>"Require that urban development is located and designed to allow water bodies to meander and move naturally".</b>
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.060	Policy 14: Urban development effects on freshwater and the coastal	Support in part	Council supports the policy intent and that this should apply to regional plans.  However, in developing the objectives, policies, and methods including rules, GWRC must work with territorial authorities to ensure that the impacts any new provisions may have on infrastructure delivery,	Retain policy as notified but acknowledge the need include a method of delivery to address the comments from Council.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		marine area - regional plans		operation and maintenance are understood and addressed.	
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.066	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose in part	<p>This uses general and undefined terms including 'urban development', 'requiring the control' and 'require the development'. This creates unnecessary confusion and will result in inequal application of the policy.</p> <p>Clarity is required to determine if development includes small scale rural development, especially where it adjoins urban zones, and thresholds relating to clause (e). Through clause e), GWRC is acting in ultra vires, as it relates to limits which have not yet been defined.</p> <p>The policy direction is very strong in respect of the need to protect and enhance features under (h). This places resource burdens on territorial authorities and developments and goes beyond what is required by section 3.5 (4) if the NPS-FM</p> <p>Council is concerned that (i) would relate to very small streams and wetlands even if they are ephemeral.</p> <p>Urban development design required under (f) would also appear to require a change to district plans as well as (l), to give effect to mapped rivers and wetlands. Council notes that this put resource burdens on territorial authorities.</p> <p>A definition of wetland is required. It is unclear whether the use within the RPS is consistent with the definition under the NPS-FM.</p>	<p>Amend to clarify definitions of identified undefined terms. Clarify role of urban Māori and how they are represented. Amend policy to address comments. Amend (i) to read:</p> <p>"Require riparian buffers for all <b>natural</b> waterbodies and avoid piping of rivers <b>where practicable</b>"</p>
<b>S79 South Wairarapa District Council</b>	S79.028	Policy 14: Urban development effects on freshwater and the coastal marine	Support in part	<p>This policy is generally supported in that the matters contained within it are best managed or directed by a Regional Authority and their functions under s.30 of the RMA. Similarly, the roles of TA's, including as owners and operators of infrastructure, ensures that the matters can be addressed as conditions attached to consents, particularly for stormwater.</p>	<p>Retain as notified</p> <p>Include method that develops non- regulatory guidance on good practice to achieve the policy.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		area - regional plans		<p>Council does have concerns that any required planting for open water races in an urban setting would preclude maintenance and result in overtopping or counterintuitive outcomes for water quality.</p> <p>Council would support the development of good practice guidelines and engineering standards to assist implementation where they are not currently available.</p>	
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.045	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Considers there is an express need for iwi, hapū and affected landowners to identify and map rivers, and in particular wetlands with the regional and district councils. This will guarantee that Māori landowners have the opportunity to ensure water bodies of significance to them are appropriately identified.	Amend Policy 14 clause (l) to read: (l) Identify and map rivers and wetlands <b>in conjunction with iwi, hapū and affected landowners.</b>
<b>S113 Wellington Water</b>	S113.016	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	This policy is reliant on the definition of hydrological controls, which is a very unclear definition. Clarity would be improved by adding the suggested wording to these this clause.	Add the following to subclause 14(j): <b>Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;</b>
<b>S113 Wellington Water</b>	S113.019	Policy 14: Urban development effects on freshwater and the coastal	Oppose	'Minimise' and 'maximise' are too strong, unless defined consistently with the pNRP	Include definitions for minimise and maximise consistent with the pNRP

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		marine area - regional plans			
<b>S115 Hutt City Council</b>	S115.039	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	This policy duplicates other policies in the RPS. (e.g. Policy 15 (i))	Redraft Policy 14 to remove duplication
<b>S118 Peka Peka Farm Limited</b>	S118.010	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Policy 14 is directive to regional plans. Sub-sections (f) and (g) and (h) relate to requirements on urban development which, without appropriate qualification, may be outside of the scope of a regional plan. Some of these matters are also replicated in Policy FW.3 and Policy 15.	Delete or appropriately qualify sub-sections (f), (g) and (h) of Policy 14. Amend Policy 14 to not duplicate Policy FW.3 and Policy 15.
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.063	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Ātiawa supports the overall intent of Policy 14, the policy includes much greater controls and checks for managing the effects of urban development on freshwater and the coastal marine area, including recognising and providing for mana whenua freshwater values.	Retain as notified.

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<b>S133 Muaūpoko Tribal Authority</b>	S133.007	Policy 14: Urban developme nt effects on freshwater and the coastal marine area - regional plans	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
<b>S137 Greater Wellington Regional Council (GWRC)</b>	S137.004	Policy 14: Urban developme nt effects on freshwater and the coastal marine area - regional plans	Support in part	Amendments to wording for consistency with Policy 12. Addition of 'urban' for clarity on development referred to.	Amend Policy 14 as follows: Regional plans <b>shall give effect to Te Mana o te Wai and include</b> objectives, policies, and methods including rules that, <del>must give effect to Te Mana o te Wai and in doing so must:</del> ... (e) Require <del>the urban</del> development, including stormwater discharges, earthworks and vegetation clearance to meet any limits set in a regional plan;
<b>S140 Wellington City Council (WCC)</b>	S140.040	Policy 14: Urban developme nt effects on freshwater and the coastal marine area - regional plans	Support in part	The new policy requires urban development to protect gully heads. This differs from the other features in this policy 14(h) in that it is not a freshwater body. Earthworks around gully heads can reduce erosion risk and can create more usable areas for development, which reduces the greenfield areas needed to house population growth and meets NPS-UD objectives. Urban development is already required in (g) to follow existing land contours "to the extent practicable"	Amend as following: ...(h) Require that urban development is located and designed to protect and enhance <del>gully heads</del> , rivers, lakes, wetlands, springs, riparian margins and estuaries
<b>S147 Wellington Fish and Game Council</b>	S147.052	Policy 14: Urban developme nt effects on freshwater	Support	Necessary to give effect to the NPS-FM	Retain as notified

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		and the coastal marine area - regional plans			
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.036	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose in part	WIAL is concerned that this policy has applied the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area. There are separate provisions relating to the management of the coastal environment and coastal marine area in the RPS. It is also confusing to have coastal policies in the Freshwater chapter and has the potential to cause interpretation problems in the future.	Delete reference to the coastal marine area in this policy and explanation. Ensure it only applies to freshwater and is consistent with the National Policy Statement for Freshwater Management 2020.
<b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b>	S157.024	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> <li>- meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance;</li> <li>- Water Sensitive Urban Design;</li> <li>- Minimising the extent and volume of earthworks and following existing land contours;</li> <li>- Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</li> <li>- Riparian buffers and avoiding the piping of rivers;</li> <li>- Hydrological controls;</li> <li>- Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants.</li> </ul> <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too</p>	Amend subclause (c) Require the <b>management control</b> of both land use and discharge effects from the use and development of land on freshwater and the coastal marine area;

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				<p>uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	

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<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.025</p>	<p>Policy 14: Urban developme nt effects on freshwater and the coastal marine area - regional plans</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> <li>- meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance;</li> <li>- Water Sensitive Urban Design;</li> <li>- Minimising the extent and volume of earthworks and following existing land contours;</li> <li>- Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</li> <li>- Riparian buffers and avoiding the piping of rivers;</li> <li>- Hydrological controls;</li> <li>- Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants.</li> </ul> <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of</p>	<p>Amend. (d) <b>Identify how to</b> Achieve the target attribute states set for the catchment;</p>

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



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				<p>- Hydrological controls;                      - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants.                      While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.                      The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.                      A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.                      The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'.                      Stormwater quality are typically generated by the way</p>	

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				<p>in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.027</p>	<p>Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> <li>- meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance;</li> <li>- Water Sensitive Urban Design;</li> <li>- Minimising the extent and volume of earthworks and following existing land contours;</li> <li>- Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</li> <li>- Riparian buffers and avoiding the piping of rivers;</li> <li>- Hydrological controls;</li> <li>- Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants.</li> </ul> <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term</p>	<p>Amend.</p> <p>(f) Require that urban development is designed and constructed using the principles of Water Sensitive Urban Design applicable <b>to the development type;</b></p>

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				<p>exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.028</p>	<p>Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> <li>- meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance;</li> <li>- Water Sensitive Urban Design;</li> </ul>	<p>(g) Require that urban development <b>is</b> located and designed to minimise the extent and volume of earthworks <b>to the extent practicable</b> and to follow, to the extent practicable, existing land contours;</p>

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

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.029</p>	<p>Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> <li>- meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance;</li> <li>- Water Sensitive Urban Design;</li> <li>- Minimising the extent and volume of earthworks and following existing land contours;</li> <li>- Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</li> <li>- Riparian buffers and avoiding the piping of rivers;</li> <li>- Hydrological controls;</li> <li>- Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants.</li> </ul> <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional</p>	<p>(h) Require that urban development is located and designed to <b>reduce the potential for adverse effects on</b> <del>protect and enhance</del> gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</p>

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				<p>plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.030</p>	<p>Policy 14: Urban development effects on freshwater</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p>	<p>(j) Require hydrological controls to <del>avoid</del> <b>reduce</b> adverse effects of runoff quantity (flows and volumes) <del>and maintain, to the extent practicable, natural stream flows;</del></p>

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

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				<p>avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.031</p>	<p>Policy 14: Urban developme nt effects on freshwater and the coastal marine area - regional plans</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> <li>- meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance;</li> <li>- Water Sensitive Urban Design;</li> <li>- Minimising the extent and volume of earthworks and following existing land contours;</li> <li>- Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</li> <li>- Riparian buffers and avoiding the piping of rivers;</li> <li>- Hydrological controls;</li> <li>- Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants.</li> </ul> <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too</p>	<p>(k) Require <b>subdivision, use and development to adopt</b> stormwater quality management measures that will minimise the generation of contaminants, and maximise, <del>to the extent practicable</del>, the removal of contaminants from stormwater <b>to the extent practicable</b>; and</p>



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				<p>uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				[Note: Submission references to prior submission point S157.023]	
<b>S158 Kāinga Ora Homes and Communities</b>	S158.019	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Notes the NPS-FM does not prohibit the piping of rivers, but rather implements the effects management hierarchy of avoid, mitigate and remedy.	Amend sub-point (i) as follows: (i) Require riparian buffers for all waterbodies and avoid piping of rivers <b>where practicable and where the effects cannot be avoided, they are minimised or remedied. Aquatic offsetting or compensation may be used where the piping of the river cannot be avoided, minimised or remedied.</b>
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.049	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose in part	This policy appears to be restricted to the effects of urban development on freshwater. If that is the case, then the chapeau should be amended and policy (l) removed so that mapping of rivers and wetlands is required generally and not just in relation to urban development. Further policies are required to ensure there is no further loss of extent of natural inland wetlands.	Amend the chapeau as follows: <b>In managing the effects of urban development</b> , Regional plan objectives, policies, and methods including rules, must give effect to Te Mana o te Wai and in doing so must: ... Include a new policy: (x) require that urban development avoids the loss of extent or values of natural inland wetlands. Remove clause (l) and insert a separate standalone provision to direct the identification and mapping of rivers and wetlands
<b>S166 Masterton District Council</b>	S166.026	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Not Stated / Neutral	Further clarity sought on roles and functions with joint processing, thresholds etc. expectations around processing. Will need to be managed by both Regional and District Councils. District Councils currently being compelled by GWRC to obtain discharge consents for existing stormwater networks. We need clarity on the "roles" and "responsibilities" of the TA and Regional Council under this proposed change.	Clarifications. Further clarity sought on this Policy.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S167 Taranaki Whānui</b>	S167.077	Policy 14: Urban developme nt effects on freshwater and the coastal marine area - regional plans	Support	Taranaki Whānui supports the amendments to Policy 14.	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.038	Policy 14: Urban developme nt effects on freshwater and the coastal marine area - regional plans	Support in part	<p>The title of this policy indicates that the provision relates specifically to urban development. However not all elements of the provision are specifically about urban development, and many are relevant to all freshwater decisions, for example see clauses a - e, l - l.</p> <p>If the intention of the policy is that it applies only to urban development, how will these matters be managed for other forms of development? No definition of 'urban development' is provided in the plan change. Restricting the scope of the policy in this way is neither appropriate, efficient or effective, and neither will it give full effect to the NPS FM.</p> <p>If additional provisions will need to be drafted and incorporated into the RPS in the future to address non-urban matters, this will lead to considerable repetition and the likelihood of confusion, inefficiencies, and inconsistencies in approach. A disjointed and confused approach will go against the intended and stated objective of achieving integrated management.</p>	<p>Amend the policy:</p> <p>To improve the grammatical structure, and provide greater clarity and consistency, including in particular clauses a and b;</p> <p>To extend clause (d) to refer to environmental flows, not just target attribute states</p> <p>So that it applies to all use and development, not just 'urban development', in order to efficiently and effectively achieve integrated management.</p>
<b>S169 Kahungun u Ki Wairarapa</b>	S169.008	Policy 14: Urban developme nt effects on freshwater and the coastal marine	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National	Retain as notified

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		area - regional plans		Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.029	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	<p>Policy 14: Managing contamination in stormwater from development - regional plans</p> <p>It is worthwhile to consider whether this policy could also be included in District Plans, not just the Regional Plans. The word 'manage' is not ideal as it refers to a world that we may never reduce the contamination. It is not appropriate that, with this wording we are required to accept some form of contamination to constantly occur. It is ideal that the policy intent reflects the contamination from stormwater will be phased off because we have rules and provisions in place that we stopped the contamination to reach to our rivers, ocean, and wetlands. New and existing subdivision and development (their regulation mostly covered by District Plan clauses) should not allow paru water reaching to our precious freshwater environments, in which some of them are severely contaminated already.</p>	<p>Require inclusion in District Plans as well as Regional Plans. Replace 'manage' with stronger wording to ensure the contamination of stormwater is phased out. Subdivisions should not be allowed if paru water will reach freshwater environments.</p>
<b>S16 Kāpiti Coast District Council</b>	S16.049	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	<p>It is Council's understanding the justification GWRC is using to base the proposal to require city and district councils to carry out water quality and aquatic ecosystem health functions is the reference in section 31 of the RMA to the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources. This clause does not give city and district councils the power to manage waterbodies and aquatic ecosystem health.</p> <p>Council also notes references in the NPS-FM that could be interpreted to be requiring city and district councils to carry out freshwater management responsibilities, however this is not Council's reading of the NPS-FM.</p> <p>If it is the intent of the NPS-FM to transfer freshwater management responsibilities to city and district councils, and Council does not consider it is, then the RPS needs to be very specific on the responsibilities proposed for city and district councils to achieve this -</p>	<p>Amend Policy 15 to remove the requirement for district plans to manage earthworks and vegetation disturbance to the extent necessary to achieve the target attribute states. Amend Policy 15 to specify and support district plan provisions that have positive impacts on freshwater such as:</p> <ol style="list-style-type: none"> <li>1. setbacks for vegetation disturbance and earthworks from water bodies.</li> <li>2. Earthworks sediment management.</li> <li>3. Subdivision layout and design.</li> <li>4. Attenuation and hydraulic neutrality.</li> </ol>

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				<p>and such activities and responsibilities must fall within the functions and technical capabilities of city and district councils. City and district councils have no technical expertise on the management of water quality or ecosystem health, and therefore we would expect the section 32 evaluation to identify and explore this issue with respect to the alternative methods that may be the most appropriate, effective and efficient method to achieve the relevant objectives. The section 32 evaluation does not do this.</p> <p>Although Council agrees there are functions city and district councils have in section 31 for the management of activities that can result in adverse effects on water such as earthworks and vegetation removal, we do not agree city and district councils can include regulatory methods in a district plan managing these activities to achieve the target attributes. Council notes the guidance on this matter released by the Ministry for the Environment for territorial local authorities does not support the approach taken by Policy 15 as follows:</p> <p>The NPS-FM 2020 does not provide specific directions about what approaches territorial authorities should use to manage the effects of land use and development on freshwater in district plans. The approach provides flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district<sup>1</sup>.</p> <p>Council would support the inclusion of provisions in the RPS that support and provide statutory weight for district plan provisions that manage earthworks and vegetation removal that may affect water, but we do not support the requirement for district plans to include water quality provisions that would need city and district councils to have regional council expertise, and regional council functions under section 30 of the RMA.</p> <p>Finally, Council notes all the requirements of policy 15 are covered by regional council functions under section</p>	

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				30 of the RMA, meaning GWRC is able to include provisions managing these activities and the effects of these activities in their regional plan(s).	
<b>S25 Carterton District Council</b>	S25.023	Policy 15: Managing the effects of earthworks and vegetation disturbanc e - district and regional plans	Oppose	<p>While CDC supports a more holistic consideration of the effects of earthworks and vegetation clearance, it is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m<sup>2</sup>).</p> <p>It is unclear how policies, rules and methods, and subsequent assessment of land use consent applications, should be applied in a district plan context. CDC does not have the capacity to undertake an assessment of the matters described in this policy as they do not relate to core territorial authority functions, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks.</p> <p>Policies, rules and methods addressing these matters are more appropriate in a regional plan and therefore CDC requests that references to district plans are removed from this policy.</p>	Remove reference to district plans from this policy, so that the requirements only apply to regional plans.
<b>S30 Porirua City Council</b>	S30.040	Policy 15: Managing the effects of earthworks and vegetation disturbanc e - district and regional plans	Oppose	<p>It is important that controls in District Plans do not duplicate those in the Regional Plan. Unlike District Plans, Regional Plans can control both land uses and discharges and as such are the primary tool for achieving target attribute states for water bodies.</p> <p>The policy should be split into two policies so it is clear what the Regional Plan should cover and what district plans should cover. Otherwise, it lacks regulatory certainty as district plans do not have the jurisdiction to address everything they are being required to by this policy.</p> <p>The qualifier "to assist" is being sought as regulation can and should be used to assist in achieving target attribute states, but by themselves they can't achieve them.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives. It should be split into two policies so it is clear what the Regional Plan should cover and what district plans should cover; and/or reword as follows: Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to minimise the extent necessary to <b>assist in achieving the target attribute states that are set in the Regional Plan</b> for water bodies and freshwater ecosystems including the effects of these activities on the life- supporting capacity of soils, and to provide for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</p>

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				The policy also needs to provide clearer direction as to what providing for mana whenua and their relationship actually means in respect of earthworks and vegetation disturbance. As it is worded, all it does is repeat s6(e) of the RMA and adds no value.	
<b>S32 Director-General of Conservation</b>	S32.014	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	<p>The proposed changes to this policy would leave a timing gap in its effect until target attribute states have been set.</p> <p>They would also mean that as long as the target attribute state is met there would be no requirement to minimise erosion and siltation (ie it would allow deterioration of water quality down to the target attribute state).</p>	Decline the proposed change and retain the operative version of Policy 15, or, Retain the proposed plan change and existing the requirements of the operative version of Policy 15.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.061	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose in part	<p>Council supports the intent to manage freshwater to provide for mana whenua and their relationship with te taiao.</p> <p>This represents a change in approach that would relate to all vegetation even where vegetation disturbance is a permitted activity on which district plans cannot then impose conditions. Regional council already provide guidance on earthworks management alongside provisions relating to earthworks.</p> <p>Council considers that water quality is a regional council function and the NPS- FM in its guidance identifies "flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district"</p> <p>We consider that the measures the policy is now trying to manage, is outside the scope territorial authority. Council notes that some forms of vegetation disturbance (such as trimming) do not alter the ground conditions.</p>	<p>Amend so that this applies to regional plans only or to identify measures over which territorial authorities have control. Amend to read:</p> <p>"Regional <del>and district plans</del> shall include policies, rules and/or methods that control earthworks and vegetation <del>disturbance</del> removal to..."</p> <p>If necessary, add a specific district plan policy related to erosion and sediment run-off from small scale earthworks in urban areas.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S79 South Wairarapa District Council</b>	S79.029	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose in part	<p>The policy is written in a manner that holds TA's responsible for meeting freshwater targets and limits in regional plans. this is not the function of Territorial Authorities under s.31 of the RMA to manage the use of land to achieve water quality and quantity attribute states. Similarly, this is not within the scope of 3.5(3) of the NPS which looks to 'promote positive effects' and avoid, remedy, mitigate for general health and wellbeing, not to achieve target and limits.</p> <p>TA's contributions to meeting NPS FM is adequately addressed above in the amended Policy 14 and FW.1 as part of GWRC discharge consent decisions and other regional plan matters.</p> <p>Further, much of the activities requires by the policy is managed by not only the regional plan but also the NES F. Duplication where this is required by both TA's and RC's inefficient and doesn't meet s.32.</p> <p>It is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m<sup>2</sup>).</p> <p>SWDC does not have the capacity to undertake an assessment of the matters described in this policy as they do not relate to core territorial authority functions, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks. Policies, rules and methods addressing these matters are more appropriate in a regional plan.</p>	Remove the requirement in Policy 15 for TA's to manage activities to achieve attribute states.
<b>S115 Hutt City Council</b>	S115.040	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and	Support	No reasons given	Retain as notified



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans			
<b>S128 Horticulture New Zealand</b>	S128.026	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	It is noted that the RPS does not include definitions for earthworks or vegetation disturbance - this would assist in providing clarity to the policy.	Retain as notified however consider providing definitions for earthworks or vegetation disturbance.
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.064	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	<p>Ātiawa supports reference to providing for mana whenua values, and our relationship with our culture, land, water, sites, wāhi tapu and other taonga.</p> <p>Ātiawa supports this consideration to be applied to regional and district plans to ensure that those mana whenua values are provided for in regards to earthworks and vegetation clearance. These two activities can have devastating impacts on mana whenua values when poorly managed.</p> <p>The current drafting does not provide strong policy direction, the words 'to the extent necessary' are open to interpretation, and are a soft approach to the management earthworks and vegetation disturbance. Ātiawa has suggested the deletion of those words to ensure target attribute states are achieved and mana whenua values are provided for.</p>	<p>Amend to: Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to <del>the extent necessary to achieve the target attribute</del> states for water bodies and freshwater ecosystems including the effects of these activities on the life supporting capacity of soils, and to provide for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</p> <p>The current drafting does not provide strong policy direction, the words 'to the extent necessary' are open to interpretation, and are a soft approach to the management earthworks and vegetation disturbance. Ātiawa has suggested the deletion of those words to ensure target attribute states are achieved and mana whenua values are provided for.</p>
<b>S133 Muaūpoko Tribal Authority</b>	S133.008	Policy 15: Managing the effects of	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.

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		earthworks and vegetation disturbance - district and regional plans			
<b>S140 Wellington City Council (WCC)</b>	S140.041	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	Support as proposed.	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.053	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified
<b>S158 Kāinga Ora Homes and Communities</b>	S158.020	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and	Support in part	Seeks that this policy is separated into regional plan functions and district plan functions. Considers that the policy could also be redrafted to improve readability by cascading each requirement.	Amend and separate the policy into regional and district plan functions. New policies will need to be created. AND Include cascading points under the chapeau of 'the control of earthworks and vegetation'.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans			
<b>S163 Wairarapa Federated Farmers</b>	S163.053	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	There are currently no limits for suspended sediment - or indeed any other attribute - in this region pending the upcoming plan changes in 2023 (urban) and 2024 (rural). The appropriate time to consider provisions for meeting any such limits will be in those plan changes. Refer to submission for more detail.	That the amendments to Policy 15 be deleted.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.050	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	<p>Further components are required to ensure this policy is:</p> <p>a. in accordance with s6(a) and (c) of the RMA, b. gives effect to NPSFM Policies 6 and 7, and c. gives effect to NZCPS Objective 1 and Policies 11, 13, and 14.</p> <p>Amendments required for clarity and to ensure no further wetland loss, the protection of rivers and their margins. Sedimentation generated on land affects estuaries and harbours and these environments are not provided the same protection under the NPSFM as inland water bodies. A bespoke policy directing a reduction in sedimentation affecting estuaries and harbours is required.</p>	<p>Amend as follows:</p> <p>Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to <del>to</del> <b>minimise the extent necessary in order</b> to achieve the target attribute states for water bodies and freshwater ecosystems, <del>including the effects of these</del> <b>avoid adverse effects generated by these activities on the life-supporting capacity of soils, wetlands, rivers and their margins,</b> and to provide for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</p> <p>Include additional policy: <b>(x) reduce sedimentation rates in the region's estuaries and harbours;</b></p>
<b>S166 Masterton District Council</b>	S166.027	Policy 15: Managing the effects of earthworks and vegetation disturbance	Oppose in part	Policy asks TAs to manage earthworks and vegetation disturbance to achieve target attribute states. Understand under NPS-FM environmental bottom lines are required, but this Policy goes as far as to manage earthworks for driveways and retaining walls.	Provide further clarifications to address the relief sought in the submission

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		e - district and regional plans			
<b>S167 Taranaki Whānui</b>	S167.078	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	Taranaki Whānui supports the amendments to Policy 15. We note mana whenua values have been provided for and that target attribute states must be achieved.	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.039	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	Rangitāne o Wairarapa support the content of this provision but, as a whole, the policy doesn't make grammatical sense. One way to improve clarity would be to split the matters into several distinct clauses.	Reword the provision to provide greater clarity and improve the grammatical structure of the policy
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.040	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	It is unclear why the life supporting capacity of soil is a freshwater matter.	Provide better clarity in the policy on the relationship of the life-supporting capacity of soil to achieving freshwater outcomes.
<b>S170 Te Rūnanga o</b>	S170.030	Policy 15: Managing	Support in part	By using the word 'managing' we are accepting and acknowledging the effects of earthworks and vegetation	Change the word "Managing" in the policy to avoid.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Toa Rangatira</b>		the effects of earthworks and vegetation disturbance - district and regional plans		disturbance instead of avoiding these activities to achieve the target attribute states for water bodies and freshwater ecosystems.	
<b>S11 Outdoor Bliss Heather Blissett</b>	S11.008	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Health of the river comes first	Amend as follows: Take and use of water for the health needs of <b>the river first and then</b> people
<b>S30 Porirua City Council</b>	S30.041	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Council supports the inclusion of marae.	Retain as notified.
<b>S32 Director-General of Conservation</b>	S32.015	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	The proposed change would have the effect of treating any and all community or public water supply, including for industrial and farming use, as being for health needs of people. This is inconsistent with Te Mana o te Wai, which provides for industrial and farming use of water in the third priority.	Amend the proposed Policy as follows or words to like effect: "...The health needs of people include <b>the drinking water component of:</b> The taking of water by any..."
<b>S79 South Wairarapa District Council</b>	S79.030	Policy 17: Take and use of water for the health	Support	Support the prominence of the health needs of people.	Retain as notified

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		needs of people - regional plans			
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.046	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Supports Policy 17 and its implementation through regional plans, and the review of water allocation plans. However, considers that "papakāinga" should be added to point (d), to ensure water can be provided.	Amend Policy 17 clause (d) to read: (d) the taking of water for marae <b>and papakāinga</b> .
<b>S115 Hutt City Council</b>	S115.041	Policy 17: Take and use of water for the health needs of people - regional plans	Support	No reasons given	Retain as notified
<b>S128 Horticulture New Zealand</b>	S128.027	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	<p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p> <p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p>	Amend as follows: Regional plans shall <b>in managing take and use of water and discharges to freshwater include policies, rules and/or methods that</b> prioritises the health and wellbeing of the waterbody and freshwater ecosystems first, and then prioritises <del>any take and use of water</del> for the health needs of people.
<b>S128 Horticulture New Zealand</b>	S128.028	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	<p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p> <p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, seek greater clarity and</p>	Amend as follows: The health needs of people include:  (a) the taking of water by any statutory authority that has a duty for public water supply under any Act of Parliament <b>for drinking water or other essential health need;</b> (b) the taking of water for reticulation into a public water supply network <b>for drinking water or other</b>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				amendment to this policy both in the way in which it directs regional plans, and the health needs of people.	<b>essential health need;</b> (c) the taking of water for community <b>drinking water</b> supplies; and
<b>S128 Horticulture New Zealand</b>	S128.029	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	<p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, HortNZ seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p> <p>In the context of the NPSFM 2020 and the hierarchy of priorities of Te Mana o Te Wai, seek greater clarity and amendment to this policy both in the way in which it directs regional plans, and the health needs of people.</p>	New subclause to be added. <b>(e) food production that contributes to domestic food supply.</b>
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.065	Policy 17: Take and use of water for the health needs of people - regional plans	Support	<p>In principle Ātiawa supports the amendments to Policy 17 which provides for the of obligations to be applied to water takes. Ātiawa also supports the inclusion of subclause (d) to include the taking of water for marae as part of the health needs of people.</p> <p>Ātiawa is keen to understand how this policy will be applied to current water permits, especially where catchments are over-allocated or nearing overallocation. Water rights (including permits) are a significant issue for Ātiawa</p>	Retain as notified.
<b>S133 Muaūpoko Tribal Authority</b>	S133.009	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
<b>S140 Wellington City Council (WCC)</b>	S140.042	Policy 17: Take and use of water for the health	Support	Support as proposed.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		needs of people - regional plans			
<b>S144 Sustainable Wairarapa Inc</b>	S144.038	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Needed in order to give effect to the NPS for FM	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.054	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Necessary to give effect to the NPS-FM	Retain as notified
<b>S163 Wairarapa Federated Farmers</b>	S163.054	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose	Defer to full review of the RPS in 2024.  The health needs of people (drinking water and basic sanitation) are only a portion of municipal takes: as currently written, the policy implies all takings of water by statutory authorities.	That the amendments to Policy 17 be deleted
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.051	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	Reference to "community supplies" is vague and must be qualified. Otherwise, it could suggest water for third order priorities (i.e. social, economic and cultural wellbeing) is captured.	Amend (c) as follows: (c) the taking of water for community <b>drinking water</b> supplies; and



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S166 Masterton District Council</b>	S166.028	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Agree that the Regional Rules need to allow for the health needs of people - but acknowledge that economic and cultural needs should be considered.	Retain as notified. However: Consider the inclusion of economic and cultural needs as well, even if it is in prioritised criteria.
<b>S167 Taranaki Whānui</b>	S167.079	Policy 17: Take and use of water for the health needs of people - regional plans	Support	Taranaki Whānui supports the amendments to Policy 17 noting that the first priority is given to the health and wellbeing of the waterbody.	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.041	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	<p>While the explanation for this policy states that the policy prioritises health needs of people before other uses of water, the provision doesn't currently do that and is very broadly phrased.</p> <p>Rangitāne o Wairarapa considers that the only water takes that should have second priority under Te Mana o te Wai are water takes for drinking water and sanitation. The taking of water for 'public water supply' or 'community supplies' should be limited to the volume necessary for those purposes, and not for other uses such as irrigation or industrial use.</p> <p>It is also important that the list of health needs for water takes in this policy is an exclusive list, not an inclusive list. As it is currently drafted, other uses will be able to argue that they are 'health needs'.</p> <p>As currently drafted, the focus of this policy is on water 'takes'. Other health needs, in particular the cultural and spiritual health needs of Māori, do not require 'taking' water (for example use of water for baptism or birthing). Instead they require that sufficient water is left in waterbodies and that this water is healthy from a</p>	<p>Amend the policy: So that the only second priority water takes are for drinking water and sanitation only, and then only as these are needed the health needs of people. Amend so that other uses of a public or community supply fall within the third priority, for water takes (in accordance with Te Mana o te Wai). Clarify the list of second priority water takes ("health needs of people") so this is an exclusive list, not an inclusive one. Make provision for the cultural and spiritual health needs of tangata whenua, which require that sufficient water remains within waterbodies that is spiritually and culturally healthy.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				spiritual and cultural perspective. These health needs are currently missing from the policy and should be included.	
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.042	Policy 17: Take and use of water for the health needs of people - regional plans	Support in part	The taking of water for marae as a health need is supported.	Retain the taking of water for marae as a health need.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.031	Policy 17: Take and use of water for the health needs of people - regional plans	Oppose in part	This policy contradicts Te Ao Māori view that humans do not sit at the centre of Taiao and take and use of water is just for health needs of the people. The policy detail that says 'providing for the health and wellbeing of water bodies and freshwater ecosystems' in a way covers this view but also contradictorily says the 'health needs of people ahead of any take and use for other purposes while providing for...'	Amend the provision to address the contradictions outlined.
<b>S16 Kāpiti Coast District Council</b>	S16.050	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Council supports the proposed amendments to the policy. We consider the proposed amendments are consistent with regional council functions under section 30 of the RMA and give effect to the NPS-FM.	Retain
<b>S20 Mangaroa Peatland Focus Group_Paul Dyson</b>	S20.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors	Delete the phrase "and their restoration is promoted".

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				that the land subject to that decision was not and is not a natural wetland.	
<b>S21 Mangaroa Peatland Focus Group_Liorah Atkinson</b>	S21.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S23 Mangaroa Peatland Focus Group_Ian Spendlove</b>	S23.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S26 Mangaroa Peatland Focus Group_An drea Follett</b>	S26.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted"
<b>S30 Porirua City Council</b>	S30.042	Policy 18: Protecting and restoring	Oppose	These are very strong policy directions that go beyond and are stricter than what is in the NPS-FM. There are no exceptions here, and no hierarchy provided for when directions are not practicable.	Amend policyso that it provides clear and appropriate direction to plan users in linewith objectives, and/or reword as follows: Regional plans shall include policies, rules and/or methodsthat protect and restore the ecological health of waterbodies,

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		ecological health of water bodies - regional plans		<p>Some clauses unnecessarily duplicate directions in the NPS-FM without providing additional direction in a regional context, they also duplicate other policy directions in this RPS including policy 14.</p> <p>Several clauses have a different construct to the rest of the clauses and don't flow from "including" in the chapeau.</p>	<p>including:</p> <ul style="list-style-type: none"> <li>(a) managing freshwater in a way that gives effect to <i>Te Mana o te Wai</i>;</li> <li>(b) actively involving mana whenua / tangata whenua in freshwater management (including decision-making processes), <del>and</del></li> <li>(c) <b>identify and provide for</b> Māori freshwater values <del>are identified and provided for</del>;</li> <li>(d) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their <i>restoration</i> is promoted;</li> <li>(e) achieving environmental outcomes, target attribute states and environmental flows and levels;</li> <li>(f) avoiding the loss of river extent and values;</li> <li>(g) protecting the significant values of outstanding water bodies;</li> <li>(h) protecting the habitats of indigenous freshwater species <del>are protected</del>;</li> <li>(i) Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;</li> <li>(j) promoting the retention of in-stream habitat diversity by retaining natural features - such as pools, runs, riffles, and the river's natural form;</li> <li>(k) promoting the retention of natural flow regimes - such as flushing flows;</li> <li>(l) promoting the protection and reinstatement of riparian habitat;</li> <li>(m) promoting the installation of off-line water storage;</li> <li>(n) measuring and evaluating water takes;</li> <li>(o) restricting the reclamation, piping,</li> </ul>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>straightening or concretelining of rivers;</p> <p>(p) discourage restricting stock accessto estuaries, rivers,lakes and wetland;</p> <p>(q) restricting the diversion of water into or from wetlands -unless the diversion is necessary to restore the hydrological variation to the wetland;—(r) restricting the removal or destruction of indigenous plants in (s) restoring and maintaining fish passage</p>
<b>S31 Robert Anker</b>	S31.018	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	Consider that the phrase " and their restoration is promoted" should be deleted from the RPS.	Amend clause (c) to read: (c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, <del>and their restoration is promoted;</del>
<b>S32 Director-General of Conservation</b>	S32.016	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended.</p> <p>Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.</p> <p>Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.</p>	Retain as notified except for the following changes: "(b)actively involve mana whenua / tangata whenua in freshwater management(including decision-making processes), and <b>identify and provide for</b> Māori freshwater values <del>are identified and provided for;</del> "...
<b>S32 Director-General of Conservation</b>	S32.027	Policy 18: Protecting and restoring ecological health of water	Support in part	<p>This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended.</p> <p>Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are</p>	"(g)protecting the habitats of indigenous freshwater species <del>are protected;</del> "...

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		bodies - regional plans		<p>activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.</p> <p>Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.</p>	
<b>S32 Director-General of Conservation</b>	S32.030	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended.</p> <p>Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.</p> <p>Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.</p>	"(h)ensuring that freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;...
<b>S32 Director-General of Conservation</b>	S32.031	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended.</p> <p>Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.</p> <p>Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.</p>	"(r)restoring and maintaining fish passage <b>where appropriate</b> "
<b>S32 Director-General of Conservation</b>	S32.032	Policy 18: Protecting and restoring ecological health of water	Support in part	<p>This policy generally gives effect to higher order documents, but requires some wording changes to ensure it operates as intended.</p> <p>Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are</p>	Replacing the word "restricting" in subclauses (n) - (q) with the word "minimising".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		bodies - regional plans		activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted.  Fish passage is not appropriate in all cases, eg where it would allow predator species into habitat containing rare or threatened indigenous species.	
<b>S33 Mangaroa Peatland Focus Group_Sandy, Judith, Kauika-Stevens</b>	S33.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted"
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.065	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	In regard to clause (c), Council recommends caution around how the extent of natural inland wetlands is determined and defined, and to ensure that this is consistent with the NES-F 2020.	Retain policy as notified.
<b>S38 Mangaroa Peatland Focus Group_Heather McKay</b>	S38.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".

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<b>S39 Mangaroa Peatland Focus Group_Col in Hawes</b>	S39.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S40 Mangaroa Peatland Focus Group_Lauritz &amp; Julie Rust</b>	S40.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S41 Mangaroa Peatland Focus Group_Andrew Ayrton &amp; Carol Reeves</b>	S41.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S42 Mangaroa Peatland Focus Group_Gregor &amp;</b>	S42.002	Policy 18: Protecting and restoring ecological health of	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court,	Delete the phrase "and their restoration is promoted".



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Stephanie Kempt</b>		water bodies - regional plans		which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
<b>S43 Mangaroa Peatland Focus Group_Carol Dormer</b>	S43.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S44 Mangaroa Peatland Focus Group_Richard Dormer</b>	S44.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S45 Mangaroa Peatland Focus Group_Weaton Hill</b>	S45.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S46 Mangaroa Peatland Focus Group_Lynne Hill</b>	S46.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S47 Mangaroa Peatland Focus Group_Norman Hill</b>	S47.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S48 Mangaroa Peatland Focus Group_Duncan Carmichael</b>	S48.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S52 Gerald Keown_Mangaroa Peatland</b>	S52.003	Policy 18: Protecting and restoring ecological health of	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court,	Delete the phrase "and their restoration is promoted".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Focus Group</b>		water bodies - regional plans		which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
<b>S54 Mangaroa Peatland Focus Group_Helen Masters</b>	S54.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S55 Mangaroa Peatland Focus Group_Matthew Scrimshaw</b>	S55.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S57 Colleen Munro_Mangaroa Peatland Focus Group</b>	S57.003	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S58 Grant Munro Mangaroa Peatland Focus Group</b>	S58.003	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S59 Mangaroa Peatland Focus Group Sandra &amp; Mat Gerrard</b>	S59.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S62 Philip Clegg</b>	S62.018	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Supports protecting Aotearoa's remaining natural wetlands, however concern about a policy that requires the restoration of all wetlands. This is because the definition of restoration is inadequately defined and requires restoration to an unspecified prior state.	Either make the restoration of wetlands a non-regulatory method; or Amend the policy so the requirement to restore only applies to natural wetlands and notto areas like the peatland that have been so degraded they have ceased to be naturalwetlands.
<b>S87 Roger O'Brien Mangaroa Peatland Focus Group</b>	S87.002	Policy 18: Protecting and restoring ecological health of water bodies -	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also	Delete the phrase "and their restoration is promoted".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans		acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
<b>S91 Mangaroa Peatland Focus Group_Gavin Kirton</b>	S91.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S96 Sarah (Dr) Kerkin</b>	S96.014	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Supports protecting Aotearoa's remaining natural wetlands, however concern about a policy that requires the restoration of all wetlands. This is because the definition of restoration is inadequately defined and requires restoration to an unspecified prior state.	Either make the restoration of wetlands a non-regulatory method; or Amend the policy so the requirement to restore only applies to natural wetlands and not to areas like the peatland that have been so degraded they have ceased to be natural wetlands.
<b>S97 Mangaroa Peatland Focus Group_Nicola Rothwell</b>	S97.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S101 Mangaroa Peatland Focus</b>	S101.002	Policy 18: Protecting and restoring	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been	Delete the phrase "and their restoration is promoted".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Group_Madeline Keown</b>		ecological health of water bodies - regional plans		a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
<b>S103 Mangaroa Peatland Focus Group_ Stacey Jack-Kino</b>	S103.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S104 Hamish McDonald_Mangaroa Peatland Focus Group</b>	S104.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S105 Sharlene McDonald_Mangaroa Peatland Focus Group</b>	S105.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors	Delete the phrase "and their restoration is promoted".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				that the land subject to that decision was not and is not a natural wetland.	
<b>S107 Lisa Keown Mangaroa Peatland Focus Group</b>	S107.003	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S108 Mangaroa Peatland Focus Group_Kerry Ryan</b>	S108.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S109 Mangaroa Peatland Focus Group_Christine withey</b>	S109.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S110 Mangaroa Peatland Focus</b>	S110.002	Policy 18: Protecting and restoring	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been	Delete the phrase "and their restoration is promoted".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Group_John Ryan		ecological health of water bodies - regional plans		a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
S111 Mangaroa Peatland Focus Group_Sheila Ryan	S111.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S112 Mangaroa Peatland Focus Group_Russell Flood-Smith	S112.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
S113 Wellington Water	S113.021	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Clause (c) should be deleted because 3.22 and 3.24 of the NPS-FM set out a reasonably long list of specific exceptions to the policy direction - none of which is carried over into Policy 18. This may confuse Regional Plans, as they must give effect to the NPS-FM and the RPS.	Delete subclause(c) <del>there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</del>



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S113 Wellington Water</b>	S113.022	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	The intent of clauses (d) and (h) lacks clarity . Efficient allocation of water results in 100% of the water available for allocation being allocated, so a more suitable goal is appropriate, rather than efficient allocation. We agree water should be efficiently used.	Amend subclause  (d) <b>take limits for both allocation and minimum flows</b> achieving environmental outcomes, target attribute states and environmental flows and levels <b>with appropriate variability</b> ;
<b>S113 Wellington Water</b>	S113.023	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	The intent of clauses (d) and (h) lacks clarity . Efficient allocation of water results in 100% of the water available for allocation being allocated, so a more suitable goal is appropriate, rather than efficient allocation. We agree water should be efficiently used.	Amend subclause:(h) freshwater is <b>appropriately</b> allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided
<b>S115 Hutt City Council</b>	S115.042	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	No reasons given	Retain as notified
<b>S121 Mangaroa Peatland Focus Group_Shane Stratford</b>	S121.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors	Delete the phrase "and their restoration is promoted".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				that the land subject to that decision was not and is not a natural wetland.	
<b>S122 Mangaroa Peatland Focus Group_Jaime Walsh</b>	S122.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S128 Horticulture New Zealand</b>	S128.030	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>Many clauses reflect the NPSFM 2020 direction - e.g. clauses (a), (f), (g), (h). Where the references differ, or are framed differently, this may create interpretation issues.</p> <p>While clause (c) reflects Policy of the NPSFM (in respect of natural inland wetlands), how does this interface with the exclusions/exemptions provided for under the NPSFM? It is also noted that whether the NPSFM was intended to, or will apply to coastal wetlands is still subject to change.</p>	<p>Amend as follows:</p> <p>(c) <b>as required to give effect to the NPSFM 2020</b>, there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</p> <p>(d) <b>as required to give effect to the NPSFM 2020</b>, achieving environmental outcomes, target attribute states and environmental flows and levels;</p> <p>(e) <b>as required to give effect to the NPSFM 2020</b>, avoiding the loss of river extent and values;</p> <p>(f) <b>as required to give effect to the NPSFM 2020</b>, protecting the significant values of outstanding water bodies;</p> <p>(g) <b>as required to give effect to the NPSFM 2020</b>, protecting the habitats of indigenous freshwater species are protected;</p> <p>(h) <b>as required to give effect to the NPSFM 2020</b>, Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;</p>

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<b>S128 Horticulture New Zealand</b>	S128.031	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	There is a grammatical error in clause (g), where protecting and protected are duplicated.	Amend as follows:  (g) protecting the habitats of indigenous freshwater species <del>are protected</del> ;
<b>S128 Horticulture New Zealand</b>	S128.032	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Clause (e) more stringent that Policy 7 NPSFM of the RMA which reads" The loss of river extent and values is avoided to the extent practicable." The proposed change is missing 'to the extent practicable' - it is unclear why/whether this is intentional.	Amend as follows: (e) avoiding the loss of river extent and values to <b>the extent practicable</b> ;
<b>S128 Horticulture New Zealand</b>	S128.033	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Support promoting storage in (l), however seek this applies to water storage broadly.	Amend as follows: (l) Promoting the installation of <del>off-line</del> water storage.
<b>S131 Ātiawa ki Whakarongotai Charitable Trust</b>	S131.066	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Ātiawa supports the amendments to Policy 18 which introduce stronger controls to protect and restore the ecological health of water bodies. In particular, Ātiawa supports inclusion of subclause (a) and (b) which provide for Te Mana o te Wai and mana whenua involvement (including at decisionmaking) as well Māori freshwater values. Ātiawa seek that an integrated approach, ki uta ki tai also be included in the list of subclauses. It cannot be understated that	Include new subclauses: <b>(bb) Adopt an integrated approach, ki uta ki tai, that recognises the interconnectedness of the whole environment to ensure that ecological health of freshwater is managed in an integrated, ecosystem wide approach(bc) Incorporate the use of mātauranga Māori to protect and restore ecological health</b> Amend the following subclauses: (n) <del>restricting</del> <b>avoid</b> the reclamation, piping, straightening or concrete lining of rivers;

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				<p>understanding and managing the natural environment, particularly ecological health of water bodies is integral to achieving improves to ecological health. Additionally, Ātiawa seeks reference to mātauranga Māori. Mātauranga Māori should be recognised and provided for as part of this policy, the NPSFM provides for mātauranga Māori to be applied to all freshwater management (including ecological health). Ātiawa seeks that the word 'avoid' replace the word 'restricting' in subclauses (n),(o),(p),(q), to ensure that these activities are avoided in order to protect and restore ecological function. Ātiawa is concerned that the word 'restrict' could allow leniency and allow activities to occur that have adverse outcomes for ecological function.</p>	<p>(o) <del>restricting</del> <b>avoid</b> stock access to estuaries, rivers, lakes and wetland;                      (p) <del>restricting</del> <b>avoid</b> the diversion of water into or from wetlands - unless the diversion is necessary to restore the hydrological variation to the wetland;                      (q) <del>restricting</del> <b>avoid</b> the removal or destruction of indigenous plants in wetlands and lakes; and</p>
<b>S133 Muaūpoko Tribal Authority</b>	S133.010	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.</p>	<p>Retain as appropriate, noting a review of freshwater provisions is necessary.</p>
<b>S134 Powerco Limited</b>	S134.010	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground</p>	<p>Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines:                      "Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of water bodies, including:                      ...<del>(c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</del></p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.	.... <del>(e) avoiding the loss of river extent and values;</del> ...."
<b>S137 Greater Wellington Regional Council (GWRC)</b>	S137.005	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Amendments are required to improve readability.	Amend Policy 18 as follows: ... (c) <b>ensuring</b> there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted; ... (h) <b>ensuring</b> <del>F</del> freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;
<b>S138 Mangaroa Peatland Focus Group_Jody Sinclair &amp; Josh Lowmy</b>	S138.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S140 Wellington City Council (WCC)</b>	S140.043	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Support as proposed.	Retain as notified.

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<b>S144 Sustainable Wairarapa Inc</b>	S144.039	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The net effects of large scale water storage is unlikely to help to protect and restore the ecological health of water bodies.	Amend clause (l) to read: (l) promoting the installation of <b>public water supply or farm scale (or smaller)</b> off-line water storage;
<b>S146 Mangaroa Peatland Focus Group_Alan Rothwell</b>	S146.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S147 Wellington Fish and Game Council</b>	S147.012	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Strongly support the expansion and redrafting of Policy 18 to give effect to the NPS-FM. However, as drafted the proposed changes to Policy 18 do not give proper effect to : <ul style="list-style-type: none"> <li>• Policy 6 of the NPS-FM, regarding the protection of natural inland wetlands; and</li> <li>• Policy 10 of the NPS-FM, which specifically recognises the need for the protection of the habitats of trout and salmon.</li> </ul> The suggested amendments are intended to address this deficiency. The habitat of valued introduced species such as trout and salmon is given specific recognition under s 7(h) the RMA (1991), which carries through to Policy 10 of the NPS-FM. This reflects the fact that the protection of trout and salmon habitats acts as an umbrella to protect the habitats of a wide range of indigenous species due to the biological requirement of salmonids for abundant cool, clean, water with a wide range of natural river	new subclause <b>(ea) ensuring that there is no further loss of natural inland wetlands and their values are protected;</b>

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				forms (such as deep pools, riffles, runs, and backwater eddies). Consistent with this, trout are utilised in the Fish Index of Biotic Integrity as an indicator species for freshwater ecosystem health. The removal of protections for the habitat of these species significantly reduces the ability of regional plans and policies to reduce adverse harm to the environment.	
<b>S147 Wellington Fish and Game Council</b>	S147.013	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Trout and salmon is given specific recognition under s 7(h) the RMA (1991), which carries through to Policy 10 of the NPS-FM. This reflects the fact that the protection of trout and salmon habitats acts as an umbrella to protect the habitats of a wide range of indigenous species due to the biological requirement of salmonids for abundant cool, clean, water with a wide range of natural river forms (such as deep pools, riffles, runs, and backwater eddies). Consistent with this, trout are utilised in the Fish Index of Biotic Integrity as an indicator species for freshwater ecosystem health. The removal of protections for the habitat of these species significantly reduces the ability of regional plans and policies to reduce adverse harm to the environment.	Amend. "(g) protecting the habitats of indigenous freshwater species <b>and the habitats of trout and salmon insofar as this is consistent with the protection of the habitats of indigenous freshwater species are protected;</b> "
<b>S147 Wellington Fish and Game Council</b>	S147.055	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Acknowledge the need to amend Policy 18 to give effect to the NPS-FM and incorporate the concept of Te Mana o te Wai. However, as drafted the proposed changes to Policy 18 do not give proper effect to Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout, and salmon. The suggested amendment is intended to address this deficiency. It is also important to acknowledge the habitat of valued introduced species such as trout and salmon is given specific recognition under s 7(h) the RMA (1991), which has been carried through to Policy 10 of the NPS-FM.	Amend subclause & correct typographical errors: (g) <del>protecting</del> the habitats of indigenous <b>species, and the habitats of trout and salmon freshwater species</b> are protected
<b>S149 Mangaroa Peatland Focus Group_Mat</b>	S149.002	Policy 18: Protecting and restoring ecological	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's	Delete the phrase "and their restoration is promoted.

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thew Rothwell		health of water bodies - regional plans		as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	
<b>S150 Mangaroa Peatland Focus Group_Ana Brodie &amp; Mark Leckie</b>	S150.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S156 Mangaroa Peatland Focus Group_Tim Rothwell</b>	S156.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b>	S157.012	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.  In addition, amendments are required to recognise the potential need for essential temporary construction	Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines: Delete subclause (c) <del>(c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</del>



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				<p>dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p>	
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.013</p>	<p>Policy 18: Protecting and restoring ecological health of water bodies - regional plans</p>	<p>Oppose in part</p>	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p>	<p>Delete subclause:</p> <p><del>(e) avoiding the loss of river extent and values;</del></p>
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.014</p>	<p>Policy 18: Protecting and restoring ecological health of water bodies - regional plans</p>	<p>Oppose in part</p>	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction</p>	<p>Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines</p> <p>New subclause(s) <b>appropriate provision is made for temporary dewatering activities necessary for construction or maintenance.</b></p>

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				dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.	
<b>S159 Mangaroa Peatland Focus Group_Antony &amp; Jemma Ragg</b>	S159.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S160 Mangaroa Peatland Focus Group_Jen &amp; Chris Priest</b>	S160.002	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	The document implies that natural wetlands in the region are shrinking in fact they have been expanding which poses the question "loss since when?" The peatland is not a natural wetland and has not been a natural wetland since the late 1800's and early 1900's as confirmed in evidence to the Environment Court, which hearing which was initiated by GWRC. For the avoidance of doubt, the RPS should also acknowledge that it respects and observes the Environment Court's finding in GWRC v Adams and ors that the land subject to that decision was not and is not a natural wetland.	Delete the phrase "and their restoration is promoted".
<b>S161 Grant O'Brien</b>	S161.002	Policy 18: Protecting and restoring ecological health of water bodies -	Oppose in part	Again, as per above, the recent GWRC vs Adams case has highlighted the fact that GWRC can and has, mis-interpreted what is considered an 'natural inland wetland', and have not considered the geomorphological and geological history of the area. Thus, until all natural inland wetlands and coastal wetlands are robustly mapped and understood and affected landowners advised, we do not support any	Delete the phrase "and their restoration is promoted".

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		regional plans		change to this policy as the implications of the change are unknown /unpredictable for potentially affected communities. Landowners would need compensation for losses of investment and livelihood.	
<b>S162 Winstone Aggregates</b>	S162.007	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose in part	Policies (e) and (n) are at odds - (e) requires avoidance of the loss of river extent, while (n) restricts reclamation, piping, straightening or concrete lining of rivers - each of which is a method for losing extent of rivers. An 'avoid' policy is a coarse tool and does not allow for consideration of potential broader ecological outcomes, where significant ecological benefits may be achieved from a project that might require loss of some extent of river. There is potential for significant unintended consequences from this policy, as previously explored during the mediation sessions of the NRP covering P102. The wording of Policy 7 (The loss of river extent and values is avoided to the extent practicable) in the NPS-FM has been incorrectly interpreted by (e) as a straight avoid policy, which it is not.	Amend the policy to more accurately reflect the requirements of the NPS-FM and NES-FM. (e) <del>avoiding</del> the loss of river extent and values <b>is avoided where practicable;</b>
<b>S163 Wairarapa Federated Farmers</b>	S163.055	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	Defer to full review of the RPS in 2024	That the amendments to Policy 18 be deleted
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.052	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Various amendments are required in order to ensure the direction and ecological bottom-lines from the RMA, NZCPS and NPSFM are carried through. The NPSFM applies to natural inland wetlands and not coastal wetlands. Complementary policies in the NZCPS apply to coastal wetlands (NZCPS Policies 10, 11, 13, and 14). Accordingly, separate policy direction on coastal wetlands is appropriate.	Amend as follows: Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of water bodies <b>including, which ensure the following:</b> Remove coastal wetlands from clause (c) and include a new policy specifically for coastal wetlands that gives effect to the NZCPS as follows: <b>(x)(i) avoid adverse effects of activities on NZCPS policy 11(a) values of coastal wetlands; (ii) avoid significant adverse effects and avoid, remedy or mitigate</b>

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					<p><b>other adverse effects of activities on any NZCPS policy 11(b) values of coastal wetlands; (iii) preserve the natural character of coastal wetlands in accordance with policy 13 NZCPS; (iv) promote restoration of coastal wetlands in accordance with policy 14 NZCPS; and (v) avoid reclamation in coastal wetlands in accordance with policy 10 NZCPS.</b></p> <p>Amend clauses (i),(j) and (k) as follows:            (i) <del>promoting the retention of</del> <b>retaining</b> in-stream habitat diversity by retaining natural features - such as pools, runs, riffles, and the river's natural form;            (j) <del>promoting the retention of</del> <b>retaining</b> natural flow regimes - such as flushing flows; (k) <del>promoting the protection and reinstatement</del> <b>protect and reinstate</b> of riparian habitat;            Amend clauses (n)-(q) as follows:            (n) <del>discourage restricting</del> <b>avoiding</b> the reclamation, piping, straightening or concrete lining of rivers;            (o) <del>discourage restricting</del> <b>avoiding</b> stock access to estuaries, rivers, lakes and wetland;            (p) <del>discourage restricting</del> <b>avoiding</b> the diversion of water into or from wetlands - unless the diversion is necessary to restore the hydrological variation to the wetland;            (q) <del>discourage restricting</del> the removal or destruction of indigenous plants in wetlands and lakes; and            Amend clause (r) as follows:            (r) restoring and maintaining <b>indigenous</b> fish passage, <b>except where it is desirable to prevent the passage of some fish species in order to protect indigenous species, their life stages, or</b></p>

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					<b>theirhabitats.</b>
<b>S166 Masterton District Council</b>	S166.029	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Not Stated / Neutral	We want to see Henley Lake covered as part of this Policy, and the potential for other artificial wetlands that have ecological value to be covered.	Include artificial wetlands for protection.
<b>S167 Taranaki Whānui</b>	S167.080	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Taranaki Whānui supports the amendments to Policy 18.	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.043	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The provision as currently worded does not reflect the wording in the NPS FM, which refers to the health and wellbeing of water bodies and freshwater ecosystems. If the policy is exclusively about ecological matters, then the correct terminology is 'ecosystem health' - see Appendix 1A - Compulsory values. It is not clear whether the policy is concentrated on ecosystem health, or is trying to give effect to the full extent of matters addressed in the NPS FM. If it is the latter, the policy needs to go further if it is intended to give effect to the NPS FM.	Amend the policy to: Improve the clarity and better link the subclauses to the main clause of the policy, Reflect that both land and freshwater will need to be managed to give effect to Te Mana o te Wai; Substitute 'ecological health of waterbodies' with the phrase used in the NPS FM, which is 'ecosystem health'; Incorporate the broader concept of "wellbeing" which appears to be missing from this provision and should be included, if the intent of this provision is to give effect to the NPS FM; Reflect the structure of the NPS FM - Te Mana o te Wai should sit in the main clause of the policy as this is the overarching purpose and a holistic concept, ecosystem health is just one component of Te Mana o te Wai, and cannot be considered in isolation of the other components;

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<b>S168 Rangitāne O Wairarapa Inc</b>	S168.044	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	'Promotion' of various actions will not go far enough to achieve the necessary environmental outcomes. Rangitāne o Wairarapa consider that a level of protection will also be needed.	Substitute the word 'promoting' with text which reflects the need to 'protect to the extent necessary to achieve the environmental outcomes', as 'promoting' is insufficient.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.045	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	'Measuring' water takes will not go far enough to achieve TMOTW, these water takes will need to be 'managed' to ensure environmental flows and levels are achieved.	Include provision for managing water takes, not just measuring and evaluating them, to ensure that environmental flows and levels are achieved.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.046	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	The explanatory text for this policy does not appear to refer to the appropriate clauses when describing habitat diversity or activities which impact on habitat diversity. In addition, it is inconsistent with the NPS FM. See Appendix 1A - Compulsory Values in the NPS FM, which describes the five biophysical components of freshwater ecosystem health, and which directs that all five of these components must be managed. Habitat is just one component of freshwater ecosystem health.	Amend the explanatory text to: Refer to 'Ecosystem health' and the five biophysical components of freshwater ecosystem health that must be managed; Substitute 'freshwater ecosystems' for 'aquatic ecosystems'; Remove reference to specific clauses in the policy, as these appear not to capture all activities and also risks inappropriately elevating some activities or aspects above others.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.047	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Several of the clauses in the policy simply repeat some of the NPS FM policies, which doesn't provide any additional assistance in how these national policies are to be applied at the regional level	Provide direction on how these national policies are to be applied at the regional level.
<b>S169 Kahungun</b>	S169.009	Policy 18: Protecting	Support	In regard to (a), on behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith,	Retain as notified

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
u Ki Wairarapa		and restoring ecological health of water bodies - regional plans		an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	
S170 Te Rūnanga o Toa Rangatira	S170.032	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	<p>The policy seems to be strengthened by using the word 'avoid' in the Policy 18 (e), (f), (g), (h) and (i) maintaining the fish passages. It is unclear, though, if the policy intention is being levelled down with the word use of 'promoting' in the clause (a), (b), (c), and (d).</p> <p>It is unclear whether the hierarchy of these clauses are considered; where 'avoidance' should be emphasized more than the 'promotion' side of the Policy 18 whether should the 'avoiding' clauses be coming first before the less directive clauses. The wording 'promote' could be rewritten into 'ensure' or 'give effect to' and rendered to a more impactful and directive policy wording instead of promoting. This will balance the priorities targeted within this policy; 'avoid' and 'ensure' reflects better of the intention of the Policy 18.</p> <p>This Policy could apply to regional plans and the district plans.</p>	Use strong wordings like 'avoid' , 'ensure' or 'give effect to' in this policy.
S16 Kāpiti Coast District Council	S16.054	Policy FW.1: Reducing water demand - regional plans	Support	<p>Council notes the actions identified for regional plans to reduce water demand are necessary to give effect to the NPS-FM, although it is unclear how regional plans will be able to address all the matters via regulatory methods such as addressing public and private water losses from leaks.</p> <p>Council recommends GWRC works in collaboration with city and district councils to identify and implement the actions that would be necessary to achieve the relevant objective(s) - noting the most efficient and</p>	<p>Amend as follows:                      Policy FW.1: Reducing water demand - regional plans <b>Greater Wellington Regional Council will work with city and district councils to investigate, identify and implement the most appropriate methods to reduce water demand. This may include non-regulatory or alternative methods.</b> Regional plans <del>shall</del> may include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including:</p>

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				effective methods for some of the actions are likely to be non-regulatory or non-RMA regulatory methods.	(a) ...
<b>S30 Porirua City Council</b>	S30.043	Policy FW.1: Reducing water demand - regional plans	Support	Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions.	Retain as notified.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.068	Policy FW.1: Reducing water demand - regional plans	Support in part	In regard to clause (a) it is unclear how provisions in a RPS are expected to address leaks when this is a maintenance issue, and delivery will be impractical within the context of three waters reform.	Review to ensure provisions can be implemented.
<b>S79 South Wairarapa District Council</b>	S79.031	Policy FW.1: Reducing water demand - regional plans	Support in part	This policy appropriately directs regional plans to undertake demand management directions. However, the policy as written suggests an over reduction in demand from current levels. The s.32 does not outline the need for reduction, nor adequately identifies the costs of the policy, particularly with regard to the significant growth promoted by the plan change and the existing RPS.	Amend Policy FW.1 to replace 'reduce demand' to 'increase efficiency'.
<b>S113 Wellington Water</b>	S113.024	Policy FW.1: Reducing water demand - regional plans	Support in part	Align the language with other GW documents and provide aligned definitions. Taumata Arowai uses the terms Small, Medium and Large Networked Supplies. Group Supplies as defined in the pNRP aligns with Small and Medium, while Community Supplies and Large Networked Supplies also align  Extra wording to FW.1(d) for clarity.	Amend the policy: (d) <b>provisions requiring</b> water conservation measures, particularly in the summer months.  Amend the Explanation: Policy FW.1 requires regional plans to address the reduction of demand in <b>community or group municipal</b> water supplies.
<b>S115 Hutt City Council</b>	S115.043	Policy FW.1: Reducing water demand -	Not Stated / Neutral	Neutral on substance of policy but note an error in Table 4: Policy FW.1 is listed as being implemented by Method 1 which applies to city and district councils, but it should be Method 2. This appears to have been swapped with Policy FW.2.	Amend Table 4 as it relates to Policy FW.1 to be implemented by Method 2.



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		regional plans			
<b>S128 Horticulture New Zealand</b>	S128.034	Policy FW.1: Reducing water demand - regional plans	Support in part	This provision refers to 'registered water suppliers and users' in the body of the policy, but 'municipal water supplies' in the explanation. The use of the term 'registered water suppliers' means that the scope of the policy is potentially very broad - light of recent changes to the drinking water statutory framework e.g., Water Services Act, which has changed who is a 'drinking water supplier' - however the policy appears to be most relevant to Council supplies.	Amend as follows: Regional plans shall include policies, rules and/or methods to reduce demand of water from <del>registered</del> <b>municipal</b> water suppliers and users, including:
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.067	Policy FW.1: Reducing water demand - regional plans	Support	Ātiawa supports in principle reducing demand on water supply and encouraging more efficient use of water.	Retain as notified
<b>S140 Wellington City Council (WCC)</b>	S140.044	Policy FW.1: Reducing water demand - regional plans	Support	Support as proposed.	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.056	Policy FW.1: Reducing water demand - regional plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
<b>S163 Wairarapa Federated Farmers</b>	S163.056	Policy FW.1: Reducing water demand - regional plans	Oppose	Defer to full review of the RPS in 2024  Considers that these matters were very recently the subject of mediated agreements during the pNRP hearing and that this policy is relitigating the same issues.	That Policy FW.1 be deleted
<b>S165 Royal Forest and</b>	S165.053	Policy FW.1: Reducing	Support		Retain

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>		water demand - regional plans			
<b>S167 Taranaki Whānui</b>	S167.081	Policy FW.1: Reducing water demand - regional plans	Support in part	Support with amendments proposing a stronger partnership with mana whenua	Amend the policy to read: Regional plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users <b>to the limits set in partnership with tangata whenua / mana whenua</b> , including:
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.055	Policy FW.1: Reducing water demand - regional plans	Support in part	There is an inconsistency in the language used in this policy (and in FW.2) and Policy 17 with respect to the public water supply. This needs addressing as it is confusing as to what water users the policy applies to. Other ways to reduce water demand include recycling or reusing water.	Amend the policy to: 'Eliminate' leaks, not 'address' them (clause a) Require efficient use of water for all users, not just new developments; Require' alternative water supplies, not 'address' them (clause c); Adopt consistEnt language with other provisions with respect to water users; Correct the grammatical tense in the opening clause ('for' not 'of'); Insert additional policy clauses addressing water recycling, and address these matters; and water conservation, in the explanatory text.
<b>S16 Kāpiti Coast District Council</b>	S16.055	Policy FW.2: Reducing water demand - district plans	Support in part	Council supports the requirement for district plans to include provisions requiring alternative water supplies for non-potable use in new developments. The Operative Kapiti Coast District Plan 2021 includes such provisions for new residential units.  Council does not support the requirement for district plans to include provisions to improve the efficiency of the end use of water on a per capita basis for new developments. We have some experience in district plan provisions that attempt to achieve this (See	Amend Policy FW.2 as follows: Policy FW.2: Reducing water demand - district plans District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable: <del>(a) provisions improving the efficiency of the end use of water on a per capita basis for new developments; and</del> <b>(ba) provisions requiring alternate water supplies for non-potable use in new developments such as the</b>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				Appendix 3.1 of the Operative Kapiti Coast District Plan 2021 - Development Incentives). We can advise that such provisions are ineffective and cannot be enforced due to the ability for water end-use systems or technology to be easily exchanged for non-efficient systems or technology e.g. water efficient appliances, toilets, shower heads etc. There is no way to monitor or enforce such provisions. Council has found the most effective method to significantly reduce water demand is the installation of water meters combined with education initiatives including the provision of free advice on how ratepayers can reduce water use. These are not methods under the RMA.	<b>requirement to install rainwater tanks.</b>
<b>S25 Carterton District Council</b>	S25.024	Policy FW.2: Reducing water demand - district plans	Support in part	<p>CDC generally supports this policy.</p> <p>However, CDC questions the efficiency and effectiveness of point (a), particularly a regulatory approach in District Plans. We understand the intent of this point is to require the installation of water efficient appliances, showers and toilets. However, the costs of compliance and enforcement would be high, in particular to ensuring ongoing compliance.</p> <p>CDC considers other (non-regulatory) methods such as water meters and education on efficient use of water are more effective and efficient.</p>	Delete point (a) from Policy FW.2.
<b>S30 Porirua City Council</b>	S30.044	Policy FW.2: Reducing water demand - district plans	Oppose	<p>Council supports the policy intent of reducing water demand. However, the policy lacks the necessary precision to enable its meaningful implementation, directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concerns include:</p> <ul style="list-style-type: none"> <li>• It is not within the knowledge of a territorial authority to identify the per capita efficiency of the end use of water.</li> <li>• District plans can only manage the use, development, and subdivision of land. Council's PDP requires water meters for new buildings through the Three Waters Chapter, but it is not clear how this would extend to requiring how water is used by individuals. This is not possible through a district plan.</li> </ul>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable:</p> <p>(a) <del>provisions improving</del> <b>requiring improvements</b> to the efficiency of the end use of water on a per capita basis for new developments; and</p> <p>(b) <del>provisions</del> requiring alternate water supplies for non-potable use in new developments. Include a definition of 'registered water suppliers'.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<ul style="list-style-type: none"> <li>• The policy seems to require that district plans require individuals to use their grey water over potable water in certain circumstances. It is questionable whether this is an appropriate matter for a district plan to address in terms of s31 of the RMA, and whether it would be better addressed in a regional plan. There is also duplication between FW.1 and FW.2 in respect of provisions requiring efficient end use of water for new development and alternate water supplies for non-potable uses.</li> <li>• Development is not defined, and the policy is not calibrated to any particular scale of development. As such it would require a far-reaching regulatory framework that has not been justified in the s32 Evaluation for the RPS</li> <li>• Suggest deletion of the reference to provisions as these are methods.</li> <li>• It is unclear what is meant by "reduce demand of water from registered water suppliers and users".</li> </ul>	
<p><b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b></p>	<p>S34.069</p>	<p>Policy FW.2: Reducing water demand - district plans</p>	<p>Oppose</p>	<p>It is unclear what is meant by 'registered water suppliers and users'. Is this intended to have the same definition as Taumata Arowai - the Water Services Regulator Act 2020?</p> <p>Council notes that if the RPS also refers to existing registered water suppliers and users, territorial authorities have no authority to impose conditions over them.</p> <p>There appears to be no provisions in section 31 of the RMA to support this requirement and section 30 of the RMA identifies the development of rules "if appropriate", for the taking and use of water, as a function of the regional council. It is also unclear how this will work within the context of the three waters reform.</p> <p>Beyond this, if they are existing registered users, we do not have the ability to impinge on existing use rights in district plans, this is a regional council function only.</p> <p>A policy within an RPS should not direct joint</p>	<p>Delete policy or amend to establish non-regulatory methods.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>processing of developments. This is impracticable given the separation of powers between regional and district/city councils.</p> <p>Council does not consider district plans an appropriate mechanism to regulate end water use per capita and considers this is best handled within the Building Act.</p>	
<b>S79 South Wairarapa District Council</b>	S79.032	Policy FW.2: Reducing water demand - district plans	Oppose	The policy repeats the matters already more appropriately addressed in FW1.	Delete
<b>S113 Wellington Water</b>	S113.025	Policy FW.2: Reducing water demand - district plans	Support in part	Align the language with other GW documents and provide aligned definitions.	<p>Amend the Explanation:</p> <p>Policy FW.2 requires regional plans to address the reduction of demand in <b>community or group</b> <del>municipal</del> water supplies.</p>
<b>S115 Hutt City Council</b>	S115.044	Policy FW.2: Reducing water demand - district plans	Oppose	<p>While the intent of the policy is supported, there is no way to implement this policy with provisions in a district plan that can adequately be monitored or enforced. Although this provision does allow for consent conditions on subdivisions, the outcomes will also fall within the provisions of:</p> <ul style="list-style-type: none"> <li>Wellington Water Limited or its successors as a water provider</li> <li>The regional council as a water take and use consenting authority</li> </ul> <p>In addition, if the policy is retained, there is an error in Table 4 (see our comments on Policy FW.1)</p>	<p>Delete policy, or Amend as follows:</p> <p>"Policy FW.2: Reducing water demand - district plans District plans shall include policies, <del>rules and/or</del> methods to reduce demand of water from registered water suppliers and users, including where practicable:</p> <p>(a) provisions improving the efficiency of the end use of water <del>on a per capita basis</del> for new developments; and</p> <p>(b) provisions requiring alternate water supplies for non-potable use in new developments.</p> <p>..."</p> <p>And correct Table 4 to refer to Method 1 rather than Method 2.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S128 Horticulture New Zealand</b>	S128.035	Policy FW.2: Reducing water demand - district plans	Support in part	This provision refers to 'registered water suppliers and users' in the body of the policy, but 'municipal water supplies' in the explanation. The use of the term 'registered water suppliers' means that the scope of the policy is potentially very broad - light of recent changes to the drinking water statutory framework e.g., Water Services Act, which has changed who is a 'drinking water supplier' - however the policy appears to be most relevant to Council supplies.	Amend as follows: District plans shall include policies, rules and/or methods to reduce demand of water from <del>registered</del> <b>municipal</b> water suppliers and users, including where practicable:
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.068	Policy FW.2: Reducing water demand - district plans	Support	Ātiawa supports in principle reducing demand on water supply and encouraging more efficient use of water.	Retain as notified.
<b>S140 Wellington City Council (WCC)</b>	S140.045	Policy FW.2: Reducing water demand - district plans	Oppose	Both provisions overlap with the Building Act and the policy is not specific as to how this will be achievable under the RMA. Additionally, since the monitoring and enforcement of these provisions will also fall under the Building Act and it is unlikely, we do not have tools to monitor the efficacy of this policy. In terms of water demand management, the use of nonpotable water and the management of end of use water will not be effective. If reducing water demand is the goal, then the focus should be on the water that is being lost to leaks in the infrastructure and on understanding water use per house. The point of rainwater storage and use (non-potable water) is also already addressed in Policy 44 point (h).	Delete Policy FW.2
<b>S147 Wellington Fish and Game Council</b>	S147.057	Policy FW.2: Reducing water demand - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S158 Kāinga Ora Homes and Communities</b>	S158.021	Policy FW.2: Reducing water demand - district plans	Support in part	Seeks that the policy is amended to remove the requirement to improve the efficiency of the end use of water on a per capita basis. Seeks that the policy rather seek for the inclusion of water efficient methods are installed per new household or alternative solutions are provided within larger developments where more efficient solutions that are more 'nature-based' could be used. e.g. community rain gardens, stormwater ponds.	Amend the policy as follows: District plans shall include policies, rules and/or methods to reduce demand of water <del>from registered water suppliers and users</del> , including where practicable: <b>(a) provisions improving the efficiency of the end use of water on a per capita basis for new developments per new household equivalent through devices such as low flow fixtures; and</b> <b>(b) provisions improving the efficiency of the end use of water at a community scale for large scale developments; and</b> <b>(c) provisions requiring alternate water supplies for non-potable use in new developments.</b>
<b>S163 Wairarapa Federated Farmers</b>	S163.057	Policy FW.2: Reducing water demand - district plans	Oppose	Defer to full review of the RPS in 2024  Considers that these matters were very recently the subject of mediated agreements during the pNRP hearing and that this policy is relitigating the same issues.	That Policy FW.2 be deleted
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.054	Policy FW.2: Reducing water demand - district plans	Support		Retain
<b>S166 Masterton District Council</b>	S166.057	Policy FW.2: Reducing water demand - district plans	Support in part	Agree - but we need to specify how one will use this in practice. Will this hinder intensification?	Retain as notified. However: Further clarify the impacts on intensification.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S167 Taranaki Whānui</b>	S167.082	Policy FW.2: Reducing water demand - district plans	Support in part	Support with amendments providing a stronger partnership with mana whenua and not restricting policy direction to new infrastructure	Amend clause (a) to read: (a) provisions improving the efficiency of the end use of water on a per capita basis <del>for new developments</del> ; and
<b>S167 Taranaki Whānui</b>	S167.083	Policy FW.2: Reducing water demand - district plans	Support in part	Support with amendments providing a stronger partnership with mana whenua and not restricting policy direction to new infrastructure	Amend clause (b) to read: (b) provisions requiring alternate water supplies for non-potable use <del>in new developments</del> .
<b>S167 Taranaki Whānui</b>	S167.084	Policy FW.2: Reducing water demand - district plans	Support in part	Support with amendments providing a stronger partnership with mana whenua and not restricting policy direction to new infrastructure	Amend the policy to read: District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users <b>to the limits set in partnership with tangata whenua / mana whenua</b> , including where practicable:
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.056	Policy FW.2: Reducing water demand - district plans	Support in part	There is an inconsistency in the language used in this policy (and in FW.1) and Policy 17 with respect to the public water supply. This needs addressing as it is confusing as to what water users the policy applies to. Policy 11 of the NPS FM is worded in such a way as to 'require' efficient use by all users, not just new developments.	Amend the policy to: Adopt consistent language with other provisions with respect to water users; Require efficient use of water for all users, not just new developments (clause a); 'Require' alternative water supplies, not 'address' them (clause c); Adopt consistent language with other provisions with respect to water users; Correct the grammatical tense in the opening clause ('for' not 'of').
<b>S16 Kāpiti Coast District Council</b>	S16.080	Policy FW.3: Urban development effects on freshwater	Oppose	Council opposes a number of provisions within this policy on the basis they:  1. attempt to transfer some regional council responsibilities for freshwater to city and district councils under the guise of the reference to integrated management under section 31 of the RMA.	Either: Delete Policy FW.3 and redraft in collaboration with technical experts from city and district councils to prepare a variation to the RPS Change 1; or Delete clauses b, f, g, h, m, n, and o.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and the coastal marine area - district plans		<p>2. lack detail on how they would be implemented including what the subdivision, use and development triggers would be for their implementation.</p> <p>In places the policy merely repeats provisions of the NPS-FM and attempts to transfer them into a policy for city and district councils to implement via district plans. The main NPS-FM policies that are relevant appear to be Policies 3 and 7. Although we agree the NPS-FM introduces freshwater management considerations into the RMA plan making processes of city and district councils, we are concerned at the blunt approach taken by proposed Policy FW.3, and the apparent lack of consideration of the roles, functions, and expertise of city and district councils. It is our view the RPS is required to take a much more refined and carefully justified approach in setting requirements for district plans in the management of freshwater. This should be carried out in direct consultation with the technical experts of the city and district councils in the region. We consider the approach taken is not consistent with the intent of the NPS-FM for the following reasons:</p> <p>1. The section 32 evaluation supporting the NPS-FM states:</p> <p>a. All councils will be affected as regional policy statements, regional plans and district plans are all required to give effect to the NPS-FM 2020. All councils will also need to observe and enforce compliance with the NES-F. However, regional councils will be more affected as the matters addressed by the NPS-FM 2020 and NES-F are more within their functions(2). [Note '2' references Action for Health Waterways Section 32 Evaluation, Ministry for the Environment, 22 July 2020, page 18]</p> <p>b. There is a low level of uncertainty associated with Policy 3 because it closely reflects the statutory functions of local councils in section 31 of the RMA but gives greater specificity in regarding the whole-of-catchment approach. Any risk of overlap or confusion</p>	

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

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				and o.	
<b>S25 Carterton District Council</b>	S25.025	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>CDC opposes this policy, as it goes far beyond what is required by the NPS-FM. CDC does not have the in-house capability to provide an assessment against these matters, and considers that most of these matters sit more comfortably within the regional council functions.</p> <p>CDC requests that the policy is amended so that it is consistent with section 3.5(4) of the NPS-FM, but does not go beyond the ambit of that provision.</p>	Amend the policy so that it addresses only those matters addressed in section 3.5(4) of the NPS-FM.
<b>S30 Porirua City Council</b>	S30.045	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation and directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concern include:</p> <ul style="list-style-type: none"> <li>• Reference to clause 3.5(4) is not helpful and duplicates the NPS-FM. The purpose of the policy should be to set out the regional direction that councils are to follow, and how Te Mana o te Wai is to be implemented. Regional councils through their RPS and regional plans are required to set out what Te Mana o te Wai is and means.</li> <li>• (a): the requirement to partner with mana whenua in the development of district plans is broader than what this policy addresses. It is already a requirement of s8 of the RMA, if it is to be repeated in the RPS it should be a separate overarching policy. And in doing so, there needs to be clear direction as to what this means.</li> <li>• (b): It is unclear how or why district plans should be protecting and enhancing Māori freshwater values if they are protected through a regional plan.</li> <li>• (c): Again, this is a broader obligation on TAs irrespective under s6(e) of the RMA, and this clause does not add any value or guidance. It should sit as a separate policy with some actual guidance and</li> </ul>	<p>Delete policy. OR</p> <p>Alternatively, amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and delete (g), (h), (o), (p) and (q). Amend the explanation as follows: Explanation Policy FW.3 requires district plans to manage the effects of urban development on freshwater and the coastal marine area. <b>This is to the extent that is relevant under a territorial authority's functions under section 31 of the RMA and in a manner that does not duplicate the functions of the Regional Council under section 30 of the RMA.</b></p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>direction.</p> <ul style="list-style-type: none"> <li>• (d): the effects of urban development on what? This needs to provide guidance as to what is required to be considered.</li> <li>• (g): To what extent? and what aspects/effects need to be covered that aren't addressed by Regional Plan provisions? There is no guidance in the RPS as to what this may mean.</li> <li>• (h): How does the regional council envisage this occurring? There is no guidance in the RPS as to what this may mean.</li> <li>• (i): The two parts of this clause are unclear as to what is exactly proposed here.</li> <li>• (k): The RPS needs to contain guidance and direction about what sort of protection and enhancement is envisaged here, beyond what is already controlled through the Regional Plan.</li> <li>• (l): This clause seems to repeat clause k above. Guidance should be provided on the size and nature of these buffers, i.e. on the face of this clause a district plan could impose a 1cm buffer and it has given effect to it. It should also set out what the buffer is for, i.e. natural character, habitat protection? Regulating the piping of streams is a regional council function.</li> <li>• (o): Minimise the extent of impervious surfaces for what reason? Also, isn't this already covered by clause (i)? The discharge of contaminants is a regional council function under s30 of the RMA.</li> <li>• (p): The daylighting of streams is a regional council function.</li> <li>• (q): It is unclear what is sought beyond what is already managed by the Regional Council through the NES-DW.</li> </ul>	
<p><b>S32</b> <b>Director-</b> <b>General of</b> <b>Conservation</b></p>	<p>S32.017</p>	<p>Policy FW.3: Urban developme nt effects on freshwater and the</p>	<p>Support in part</p>	<p>The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.</p> <p>The requirement for "considering" daylighting of</p>	<p>Retain as notified, except for the following change: "<del>(p) Consider</del> <b>Encourage and support</b> daylighting of streams, <del>where practicable</del>;</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		coastal marine area - district plans		streams where practicable provides no clarity of the intended outcome and should be strengthened.	
<b>S32 Director-General of Conservation</b>	S32.033	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	<p>The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.</p> <p>The requirement for "considering" daylighting of streams where practicable provides no clarity of the intended outcome and should be strengthened.</p>	<p>add a new subclause as follow or words to like effect:</p> <p><b>"Require that urban development is located and designed to allow water bodies to meander and move naturally".</b></p>
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.056	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>Council supports the intent to give effect to Te Mana o te Wai but is concerned that this policy appears to include a list of matters over which authorities should restrict their discretion and some matters seem to go beyond what is required in the NPS- FM.</p> <p>The policy also seems want to transfer some of the regional council functions to district and city council without fully understanding the implications of doing so and could make some infrastructure projects difficult to achieve.</p> <p>Some clauses such as clause (i) seem to require a consent requirement, which Councils may not be resourced to address.</p> <p>Council considers that this policy is overly prescriptive using 'in doing so must' and is not consistent with the Ministry for the Environment guidance on the NPS- FM, which identifies that:</p> <p>"The NPS-FM 2020 does not provide specific directions about what approaches territorial authorities should use to manage the effects of land use and development on</p>	<p>Work with territorial authorities to clarify roles and functions and develop a policy that is achievable.</p> <p>Amend policy to read:                      "District plans shall include objectives, policies, and methods including rules, that give effect to Te Mana o te Wai and section 3.5(4) of the NPS- FM, and <del>in doing so must</del> <b>where relevant and practicable: ..."</b></p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				freshwater in district plans. The approach provides flexibility for territorial authorities to determine the objectives, policies, and methods that would best apply in their district"	
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.047	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Partially supports Policy FW.3. However, to give effect to the relationship mana whenua / tangata whenua have, provision (c) needs to be more directive to preclude ambiguity within the policy.	Amend Policy FW.3 clause (c) as follows: (c) <b>Recognise and provide</b> for mana whenua / tangata whenua and their relationship with their culture, land, water, wāhi tapu and other taonga;
<b>S113 Wellington Water</b>	S113.017	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	This policy is reliant on the definition of hydrological controls, which is a very unclear definition. Clarity would be improved by adding the suggested wording to these this clause.	Add the following to subclause FW.3(m): <b>Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;</b>
<b>S113 Wellington Water</b>	S113.026	Policy FW.3: Urban development effects on freshwater and the coastal marine area -	Support in part	Developments need to also consider the expectations of the stormwater management strategy and plan	Amend clause (h) as follows: (h) Consider the use and development of land in relation to target attribute states and any limits set in a regional plan <b>and the outcomes sought in an approved stormwater management strategy or plan;</b>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		district plans			
<b>S115 Hutt City Council</b>	S115.045	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	This is long, complex and prescriptive. Some of the points relate to requirements already set out in the RMA. Redrafting of this policy is required to make it more succinct.	Retain Policy FW.3, but amend to reduce the length and complexity of the policy by removing clauses that duplicate higher order direction.
<b>S118 Peka Peka Farm Limited</b>	S118.011	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>Policy FW.3 is directive to district plans, requiring them to give effect to Te Mana o te Wai and section 3.5(4) of the NPS-FM. In doing so, the policy specifies 17 requirements, many of which lack clarity and are uncertain.</p> <p>This range of matters makes the policy cumbersome and difficult to interpret. Supports the intent of the policy but seeks that the drafting of the policy be improved, including by removing any unnecessary duplication of the NPS-FM or other RPS policies.</p>	Amend Policy FW.3 to address the relief sought in the submission.
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.069	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Ātiawa supports reference to Te Mana o te Wai, and that district plans must include objectives, policies, and methods (including rules) that give effect to Te Mana o te Wai. Ātiawa is pleased that particular consideration has been given to partnering with mana whenua, Māori freshwater values (including mahinga kai) and other values, providing for a ki uta ki tai approach, and the use of mātauranga Māori.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S135 Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/Stebbing's Farmlands Ltd</b>	S135.006	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose	This policy is very broad and seeks to give effects to the NPS Freshwater Management but is unnecessary as the Natural Resources Plan already contains new rules about discharges of stormwater from new urban areas and is already effectively managed. An additional policy is over-kill and unnecessary to achieve outcomes already being achieved through other means.	Delete Policy FW.3
<b>S140 Wellington City Council (WCC)</b>	S140.046	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>WCC acknowledges its responsibilities under the NPS-FM 2020 as set out by section 3.5(4). However, some of the provisions being required by district plans are outside the scope of s30 of the RMA:</p> <ul style="list-style-type: none"> <li>• Vegetation clearance and earthworks in the riparian margin has a direct effect on the water quality of the waterbody, therefore the land use and subsequent discharge of sediment laden material should be managed by Regional Council. Otherwise, development would need to go to the relevant territorial authority for the s9 consent and then to GWRC for the s15 discharge consent. This would not promote integrated management.</li> <li>• The effects of the development on drinking water sources should be managed by Regional Council with the identification of Drinking Protection Zones and relevant requirements for discharge consents.</li> <li>• The piping of rivers is a s13 matter that should be managed by Regional Council.</li> <li>• Water efficiency is also managed by Regional Council under s14 of the RMA and is unclear how s9 would have any influence on water use.</li> </ul>	<p>Amend Policy FW.3 as following:</p> <p>... (k) Require that urban development is located and designed to protect and enhance <del>gully heads</del>, rivers, lakes, wetlands, springs, riparian margins and estuaries;<del>(l)</del> <b>Require riparian buffers for all waterbodies and avoid piping of rivers;</b></p> <p>(m) Require hydrological controls to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;<del>(n)</del> <b>Require efficient use of water;</b></p> <p>(o) Manage land use and development in a way that will minimise the generation of contaminants, including building materials, and the extent of impervious surfaces;</p> <p>(p) Consider daylighting of streams, where practicable;</p> <p>and<del>(q)</del> <b>Consider the effects of land use and development on drinking water sources...</b></p>
<b>S147 Wellington Fish and Game Council</b>	S147.016	Policy FW.3: Urban development effects on freshwater	Support in part	<p>Strongly support the inclusion of new Policy FW.3 to give effect to the NPS-FM.</p> <p>However, as drafted proposed new Policy FW.3 does not give proper effect to:</p> <ul style="list-style-type: none"> <li>• Policies 6 and 7 of the NPS-FM, regarding the protection of river extent and values and natural inland wetlands; and</li> </ul>	<p>Amend.</p> <p>(k) Require that urban development is located and designed to <b>avoid the loss of river extent and values and natural inland wetlands, and to</b> protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;"</p>



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and the coastal marine area - district plans		<ul style="list-style-type: none"> <li>• Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout and salmon. The suggested amendments are intended to address this deficiency.</li> </ul>	
<b>S147 Wellington Fish and Game Council</b>	S147.017	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	<p>Strongly support the inclusion of new Policy FW.3 to give effect to the NPS-FM. However, as drafted proposed new Policy FW.3 does not give proper effect to:</p> <ul style="list-style-type: none"> <li>• Policies 6 and 7 of the NPS-FM, regarding the protection of river extent and values and natural inland wetlands; and</li> <li>• Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater species, trout and salmon. The suggested amendments are intended to address this deficiency.</li> </ul>	New subclause: <b>(ka) Require that urban development is located and designed to protect the habitats of indigenous freshwater species, trout and salmon;</b>
<b>S147 Wellington Fish and Game Council</b>	S147.058	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.038	Policy FW.3: Urban development effects on freshwater and the coastal marine	Oppose in part	WIAL is concerned that this policy has applied the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area. There are separate provisions relating to the management of the coastal environment and coastal marine area in the RPS.	Delete reference to the coastal marine area in this policy and explanation. Ensure it only applies to freshwater and is consistent with the National Policy Statement for Freshwater Management 2020. Otherwise delete the policy.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		area - district plans			
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.032</p>	<p>Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> <li>- meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance;</li> <li>- Water Sensitive Urban Design;</li> <li>- Minimising the extent and volume of earthworks and following existing land contours;</li> <li>- Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</li> <li>- Riparian buffers and avoiding the piping of rivers;</li> <li>- Hydrological controls;</li> <li>- Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants.</li> </ul> <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p>	<p>amend subclause.</p> <p>(j) Require that urban development is located and designed to minimise the extent and volume of earthworks <b>to the extent practicable</b> and to follow, to the extent practicable, existing land contours;</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.033</p>	<p>Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> <li>- meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance;</li> <li>- Water Sensitive Urban Design;</li> <li>- Minimising the extent and volume of earthworks and following existing land contours;</li> <li>- Protecting and enhancing enhance gully heads,</li> </ul>	<p>amend subclause. (k) Require that urban development is located and designed to <b>reduce the potential for adverse effects on protect and enhance</b> gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</p>

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

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p><b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b></p>	<p>S157.034</p>	<p>Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> <li>- meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance;</li> <li>- Water Sensitive Urban Design;</li> <li>- Minimising the extent and volume of earthworks and following existing land contours;</li> <li>- Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</li> <li>- Riparian buffers and avoiding the piping of rivers;</li> <li>- Hydrological controls;</li> <li>- Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants.</li> </ul> <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what</p>	<p>amend subclause (m) Require hydrological controls to <b>avoid reduce</b> adverse effects of runoff quantity (flows and volumes) <b>and maintain, to the extent practicable, natural stream flows;</b></p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p><b>S165</b> <b>Royal Forest and Bird Protection Society of New Zealand Inc.</b></p>	<p>S165.055</p>	<p>Policy FW.3: Urban development effects on freshwater and the coastal</p>	<p>Support in part</p>	<p>Various amendments are required in order to ensure the direction and ecological bottom-lines from the RMA, NZCPS and NPSFM are carried through.</p>	<p>Amend (g) and (h) as follows:                      (g) <del>Consider</del> <b>avoid the adverse</b> effects on freshwater and the coastal marine area of subdivision, use and development of land;                      (h) <del>Consider</del> <b>control</b> the use and development of land in <del>relation</del> <b>order to achieve</b> target attribute states and <b>comply with</b> any limits set in a regional plan;</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
(Forest & Bird)		marine area - district plans			Amend clause (p) as follows: (p) <del>Consider</del> <b>promote</b> daylighting of streams, where practicable; and
<b>S166 Masterton District Council</b>	S166.058	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Oppose in part	We request clarity on the joint processing of consents (Policy FW.3, Method FW2). In particular: How is this going to work? What will trigger this process? What is the threshold? What does this look like in practice? What does this look like for iwi?	Amend clause (f) to read: (f) Integrate planning and design of stormwater management to achieve multiple improved outcomes - amenity values, recreational, cultural, ecological, climate, vegetation retention; <b>protection of life and property</b>
<b>S167 Taranaki Whānui</b>	S167.085	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support in part	Support with stronger partnership with mana whenua. Policy should also be amended to provide for the urban development outcomes detailed within Te Mahere Wai. This also needs to provide for coastal marine permits.	Amend clause (c) to read: c) <del>Provide for</del> <b>Partner with</b> mana whenua / tangata whenua <del>and</del> <b>to provide for</b> their relationship with their culture, land, water, wāhi tapu and other taonga  <b>[Note. This submission point referenced S167.0149]</b>
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.057	Policy FW.3: Urban development effects on freshwater and the coastal marine area -	Support in part	Rangitāne o Wairarapa notes that this policy is currently so broadly worded that it applies to all development, not just urban development (except as confined by the policy title). While this does not appear to be the intent, a broader application would be supported by Rangitāne o Wairarapa, as this would more efficient and effective, and more likely to give full effect to the NPS FM. As currently worded, the policy is not strong enough to give effect to the NPS FM in that it only requires 'consideration' of certain matters.	To improve the grammatical structure of clause (k) <b>[Note submission may be referencing Clause (i)]</b> , for example as follows: <del>'Require that Water Sensitive Urban Design principles and methods are applied during consideration of subdivision,</del> the extent of impervious surfaces and in the control of stormwater infrastructure <b>and the extent of impervious surfaces;</b>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		district plans		Rangitāne o Wairarapa supports a partnership approach with mana whenua /tangata whenua.	To remove the word 'consider' from clauses i and j and use wording that gives effect to the NPS FM; So that it applies to all development, not just 'urban development' (which is undefined by the plan change), in order to efficiently and effectively achieve integrated management.
<b>S169 Kahungunu Ki Wairarapa</b>	S169.010	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.050	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Policy FW.3 Implementing Te Mana o Te Wai in urban development - consideration is supported;  clauses of (i) and (l) can be strengthened by rewording. Instead of minimising earthworks extent and volume of works, this could mean to say performing earthworks, will need to be justified as to when they are absolutely needed. Identifying and mapping streams also need to be done as part of the stormwater and related-infrastructure investigations, that are attached to the consent application. This consideration could be strengthened to say no negative impact will occur in the identified and mapped streams.	Strengthen the wording of the provisions. In place of 'minimising' this could say 'performing earthworks, will need to be justified as to when they are absolutely needed'. Identifying and mapping streams must be required as part of the stormwater and related-infrastructure investigations attached to the consent application. Strengthen this provision to say no negative impact will occur in the identified and mapped streams.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.085	Policy FW.3: Urban development effects on freshwater and the	Support in part	The wording of Policy FW.1 clause (b) takes away from the strength this Policy is anchored on. This could be rewritten to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.  The clause (c) is using the word 'minimise' which does	Rewrite Policy FW.1 clause (b) to make the policy intent firmer for District and City Councils to say: '...shall use Water Sensitive Urban Design in the design and construction of urban development'.  Use stronger wording than 'minimise' in clause (c) and ensure the policy is worded in a way that the District Plan rules which flow on from this provision can be implemented. E.g. it is going



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		coastal marine area - district plans		<p>not have teeth when it comes to rules in the district plans, and their implementation. This clause caveats the land contours and extent practicable; it is unclear what triggers (rules) District Plans would have, this to be implemented.</p> <p>Most of the land is on challenging contours in Wellington and on hills that need to be cut out for feasible development to occur. Any mitigation that might be possible for flatter regions such as, Waikato or Auckland, may not be realisable, possible, or feasible in Greater Wellington.</p> <p>The policy should acknowledge and change the wording to say, if it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place.</p> <p>In summary, the policy contradicts itself because minimising earthworks in Wellington may not be able to be an option in some instances due to topography and soil conditions.</p> <p>The drafting intent of Policy FW.1 (f) is optimistic to reflect achieving multiple gains for stormwater management. In our built / urban environments, we observe the multiple issues of our stormwater network which won't be able to achieve the intent of this Policy. The policy should ensure there are stormwater-basics and bottom lines are achieved- not compromised then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention. The policy should focus on absolute musts of stormwater management and land development and acknowledge in the absence of standards and bottom lines, delivering other aspects may be a luxury. The policy needs to ensure the stormwater system provides safe and clever solutions to our communities then the rest, multiple positive outcomes, will come.</p> <p>The policy also needs to acknowledge the need of additional infrastructure to be able to give effect to this Policy.</p>	<p>to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place. Ensure the provision is workable given the topographical and geological context.</p> <p>Ensure there are stormwater-basics and bottom lines, the 'musts of stormwater management and land development' are captured in this policy. If these are first achieved then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention.</p> <p>The policy also needs to acknowledge the need of additional infrastructure and provides for safe and clever solutions for communities.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S11 Outdoor Bliss Heather Blissett</b>	S11.015	Policy FW.4: Financial contributions for urban development - district plans	Support in part	I would like to see incentives that make an impact	Implement incentives that make an impact such as costs to the developer being greater if not using sustainable practice
<b>S16 Kāpiti Coast District Council</b>	S16.081	Policy FW.4: Financial contributions for urban development - district plans	Support in part	This policy is helpful in supporting the inclusion of financial contributions in the district plan, particularly those proposed under section 80E(1)(b)(i) of the RMA. However, the policy includes unnecessary text which we seek be removed.	Amend as follows: Policy FW.4: Financial contributions for urban development - district plans District plans shall include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent where off site stormwater quality and quantity treatment is required, <del>as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution.</del> A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose. <del>Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence</del> Explanation Policy FW.4 requires financial contributions, or alternatively development contributions to be collected for the construction of catchment scale stormwater solutions, so that urban new urban development pays their fair share.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S25 Carterton District Council</b>	S25.026	Policy FW.4: Financial contributio ns for urban developme nt - district plans	Oppose	CDC opposes this policy and considers that the RPS should not include policies that dictate requirements for particular financial contributions in district plans. The appropriate mechanism for GWRC to suggest such a policy is via the Schedule 1 process for the Wairarapa Combined District Plan.	Delete this policy.
<b>S30 Porirua City Council</b>	S30.046	Policy FW.4: Financial contributio ns for urban developme nt - district plans	Oppose	<p>Council does not use financial contributions as a regulatory tool in our district plan as they are inefficient, and they duplicate our existing approach of requiring development contributions and developer agreements administered under the Local Government Act.</p> <p>The policy needs to be reworded as it lacks the necessary precision to enable its meaningful implementation.</p> <p>The advice note should be deleted as it is incorrect, we are unaware of where in the RMA these Government departments are exempt from paying financial contributions.</p> <p>The explanation note also does not provide much value.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows: <b>Except where required through a Development Contributions Policy, District plans shall include policies and rules that require the payment of financial contributions for the provision of off-site stormwater quality and quantity treatment, where that treatment is identified in a financial contributions to be applied to subdivision and development as a condition of the resource consent where off-site stormwater quality and quantity treatment is required, as set out in a Stormwater Management Plan</b> (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. <del>A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose. Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence</del>Explanation Policy FW.4 requires financial contributions, or alternatively development contributions to be collected for the construction of catchment scale stormwater solutions, so that new</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<del>urban development pays their fair share.</del>
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.057	Policy FW.4: Financial contributions for urban development - district plans	Support in part	<p>Council supports the intent to fund stormwater infrastructure but does not consider that it is appropriate to 'require' that financial contributions are used as a mechanism for this.</p> <p>It is also unclear how territorial authorities are expected to determine how a fair share of the cost is determined or how this links to other local authority funding processes such as the long-term plan. It should be for the local authority to determine the most appropriate funding mechanism.</p> <p>We note that network discharge consents are also a function of the regional council.</p> <p>There appears to be an issue here where territorial authorities are required to apply for a discharge consent but then are also required to collect financial contributions.</p>	<p>Amend to read:            "District plans <del>shall</del> <b>may</b> include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent, <b>particularly</b> where off site stormwater quality and quantity treatment is required, <del>as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution.</del> A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose."</p>
<b>S78 Beef + Lamb New Zealand Limited</b>	S78.011	Policy FW.4: Financial contributions for urban development - district plans	Not Stated / Neutral	<p>Accepts that proposed Policy FW.4 is required to give effect to the NPS-UD but neither supports nor opposes the provision.</p>	Retain as notified
<b>S79 South Wairarapa District Council</b>	S79.033	Policy FW.4: Financial contributions for urban development - district plans	Support	<p>It is unclear why the RPS is in this space. The policy is difficult to read and in parts does not make sense. Similarly, the provision as written may not meet the necessary requirements to be implemented.</p>	Delete

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S115 Hutt City Council</b>	S115.046	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>The question of how to fund stormwater management measures is a solely a decision for territorial authorities and their communities under the Local Government Act. There are a number of different tools territorial authorities can use, one of which is financial contributions. Councils also have other funding options, such as using general revenues, targeted rates, or central government funding assistance. These decisions are best made by territorial authorities based on their local context, rather than being directed through the Regional Policy Statement.</p> <p>There are also a number of issues with this policy as drafted, including the lack of a definition for "fair share", the application to financial contributions levied for permitted activities, and the inaccurate note.</p>	Delete Policy FW.4
<b>S129 Waka Kotahi NZ Transport Agency</b>	S129.019	Policy FW.4: Financial contributions for urban development - district plans	Support	Supports the Regional Council providing direction to territorial authorities to receive Financial Contributions to manage actual effects.	Retain as notified.
<b>S131 Ātiawa ki Whakarongotai Charitable Trust</b>	S131.070	Policy FW.4: Financial contributions for urban development - district plans	Support in part		Ātiawa support financial contributions to be applied to subdivision and development to mitigate the management of offsite stormwater quality and quantity treatment is required
<b>S135 Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/Stebbings</b>	S135.007	Policy FW.4: Financial contributions for urban developme	Oppose	Developers are already providing stormwater neutrality for their developments and treatment in accordance with WWL guidelines and these are ensured through consent conditions. They are also paying development contributions for stormwater on a catchment and city-wide basis in Wellington and WWL also need to lead by example to attenuate and treat their stormwater within existing urban environments rather than single out new	Delete Policy FW.4

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Farmlands Ltd</b>		nt - district plans		land developments. The policy is not clear about what constitutes off-site and is ambiguous.	
<b>S140 Wellington City Council (WCC)</b>	S140.047	Policy FW.4: Financial contributions for urban development - district plans	Oppose	<p>The question of how to fund stormwater management measures is solely a decision for territorial authorities and their communities under the Local Government Act. There are a number of different tools territorial authorities can use, one of which is financial contributions and development contributions. Territorial authorities also have other funding options, such as using general revenues or targeted rates.</p> <p>It is also unclear what type of development this policy would apply to and how the management of the system post construction factors into when financial contributions apply. There are also a number of issues with this policy as drafted, including the lack of a definition for "fair share". It will also be difficult to adequately apply financial contributions to permitted activities</p>	Delete Policy FW.4 OR Move Policy FW.4 to be a consideration policy and clarify whether the management of the new system will then fall to the Territorial Authority or not.
<b>S147 Wellington Fish and Game Council</b>	S147.059	Policy FW.4: Financial contributions for urban development - district plans	Support in part	Necessary to give effect to the NPS-FM.	Retain as notified.
<b>S158 Kāinga Ora Homes and Communities</b>	S158.022	Policy FW.4: Financial contributions for urban development - district plans	Oppose in part	Recognise the need for financial contributions, consider that financial contributions for stormwater mitigation should be limited to the effects at point of connection for a development allotment. In addition, alternative solutions for stormwater treatment should be provided for to manage quality and quantity of stormwater within a development, which would then offset the payment of financial contributions.	Amend Policy FW.4 as follows: District plans <del>shall</del> <b>may</b> include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent <b>for effects associated with stormwater quality and quantity treatment at the point of connection to the development only where off site is required</b> , as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose. <b>A financial contribution will not be required where on site stormwater quantity and quality mitigation is provided to an adequate level to reduce downstream effects.</b> Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence
<b>S166 Masterton District Council</b>	S166.059	Policy FW.4: Financial contributions for urban development - district plans	Support in part	Acknowledge that this policy is important for future planning.	Retain as notified.
<b>S167 Taranaki Whānui</b>	S167.086	Policy FW.4: Financial contributions for urban development - district plans	Support in part	Financial contributions cannot be imposed against iwi authorities	Amend the Note section to read: Note: financial contributions cannot be imposed against <b>iwi authorities</b> , Minister of Education or Minister of Defence
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.058	Policy FW.4: Financial contributions for urban	Support in part	Rangitāne o Wairarapa support seeking financial contributions for stormwater networks, where onsite treatment cannot be achieved. Our preference, however, is that wherever possible, Stormwater Management Plans should be required to be developed and implemented to ensure adverse effects on the	Amend the policy title to <b>remove the word 'urban'</b> . Amend the explanatory text to note the need for any Stormwater Management Plan to give effect to Te Mana o te Wai, which means that on-site solutions should be implemented wherever feasible, and that

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		development - district plans		environment, including any cumulative effects, are prevented, or minimised by onsite measures, rather than passing on this responsibility to others. Stormwater Management Plans should give effect to Te Mana o te Wai and prioritise the health and wellbeing of the wai first and foremost, rather than social or economic gain.	financial contributions for offsite solutions are only to be taken where this cannot be achieved.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.028	Policy FW.4: Financial contributions for urban development - district plans	Support in part	<p>Developers are required to make financial contributions to subdivision and development as a condition of their consent, ensuring that there is treatment for stormwater. It is commonly mentioned that these contributions have not been enough in the past and can only deliver less than ideal systems when it comes to stormwater systems.</p> <p>We are aware that Councils are geared up for reviewing their Financial Contribution policies as to identify what constitutes a 'fair contribution'. This policy could be reworded; instead of 'how a fair share of the cost is determined, and the nature of the contribution' it could focus on a realistic calculation of proposed development's greater connection with the current and existing infrastructure as well as the burden that it will lay on this infrastructure. It is unproductive for development contributions to just focus on the site-based stormwater systems instead of looking at the whole system and its connections.</p> <p>We have seen yet again many examples in Porirua, a development does not just have impacts where it is located but need to be considered within its overall downstream and upstream environments in the whole catchment and the infrastructure associated with it. We currently do not have well established systems to cope with existing loads regarding stormwater and wastewater overflows, let alone the needs of new subdivisions and development.</p>	This policy could be reworded; instead of 'how a fair share of the cost is determined, and the nature of the contribution' it could focus on a realistic calculation of proposed development's greater connection with the current and existing infrastructure as well as the burden that it will lay on this infrastructure.
<b>S11 Outdoor Bliss Heather Blissett</b>	S11.016	Policy 23: Identifying indigenous ecosystems and habitats with	Oppose in part	Policy if they still exhibit the ecosystem functions which are considered significant by mana whenua/tangata whenua. 30 June 2025 is plenty of time for current landowners to destroy evidence that their land exhibits the ecosystem functions. Eg. Mangaroa Wetlands. What about resistance from landowners which currently exist.	Consider timeframe to implement policy and associated risks.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant indigenous biodiversity values - district and regional plans			
<b>S16 Kāpiti Coast District Council</b>	S16.066	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	<p>Council opposes the suggested introduction of a date by which city and district councils are to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values. With the anticipated gazettal of the NPS-IB it is inappropriate for the RPS to include arbitrary dates that may conflict with the requirements of the future NPS-IB. The RPS and district plans will need to be amended in accordance with the requirements of the NPS- IB once it comes into law in its final form.</p> <p>Councils supports the introduction of mana whenua into the policy as this provides clarify for city and district councils on who is to be involved in plan changes, however we oppose the retention of tangata whenua as the literal translation of this term means people of the land. We consider this does not provide councils with any direction on who should be involved in giving effect to the policy (and all other objectives and policies in RPS Change 1 where this term is used).</p>	Delete proposed insertion of the deadline for giving effect to the policy. Retain references to mana whenua. Delete references to tangata whenua.
<b>S25 Carterton District Council</b>	S25.027	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	CDC opposes the amendment to this policy requiring that indigenous ecosystems and habitats are identified by June 2025. This policy appears to be pre-empting the forthcoming National Policy Statement for Indigenous Biodiversity (NPS-IB). CDC considers that any amendments giving effect to the NPS-IB should be addressed in a separate plan variation process.	Delete 'By 30 June 2025' from this policy.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S30 Porirua City Council</b>	S30.047	Policy 23: Identifying indigenous ecosystem s and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>Council supports this policy being timebound in principle. It has already been given effect to through our Proposed District Plan (PDP). However, Policy EI.1 requires a first principles approach to SNA identification and protection which would make it challenging for any council to meet this.</p> <p>The government has released an exposure draft of the NPS-IB which sets out additional requirements and a longer implementation timeframe. The RPS should align with these if/when the NPS-IB is gazetted.</p>	<p>Amend policy to either:</p> <ul style="list-style-type: none"> <li>• remove 2025 time frame; or</li> <li>• align with NPS-IB timeframes once gazetted; or</li> <li>• provide for councils that have mapped and protected all SNA in their plan to give effect to this policy through their next full district plan review.</li> </ul>
<b>S31 Robert Anker</b>	S31.019	Policy 23: Identifying indigenous ecosystem s and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	<p>The exposure draft indicates that SNA area plans will need to be notified within 5 years from the commencement date which date has not yet occurred. By introducing a date of June 2025 GWRC is attempting to pressure already overloaded local authorities to produce SNA maps without adequate time for community consultation.</p>	<p>Amend the policy to read: <del>By 30 June 2025</del> <b>Within 5 years from the commencement date of NPS-IB</b>, Ddistrict and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:</p>
<b>S31 Robert Anker</b>	S31.020	Policy 23: Identifying indigenous ecosystem s and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	<p>It is recognised that there are values and standards that are of significance to the Maori community and as long as those values and standards remain within that community then there is no conflict. However, once you attempt to introduce those standards into the wider community then you need to need to establish who, what, why and where.</p>	<p>Refine the RPS to address these factors and meet their obligation to the community</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S32 Director-General of Conservation</b>	S32.018	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	The inclusion of a deadline to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values is an appropriate measure to ensure that S6(c) of the RMA is given effect to. Although this is a shorter timeframe than is currently indicated in the exposure draft of the NPS for Indigenous Biodiversity, it is not unreasonable given that the RPS has required this work to be undertaken since 2013.	Retain as notified
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.073	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>Councils opposes the arbitrary timeframe imposed on territorial authorities, particularly in advance of the NPS- IB. It is impractical to require territorial authorities to implement this policy by 2025, particularly given timeframes within the NPS-IB indicate a timeframe of 5 years from implementation.</p> <p>Council notes implementation of this policy ahead of the NPS-IB would duplicate a resource heavy and expensive process unnecessarily.</p> <p>Council supports the amendments to refer to the correct wording of mana whenua.</p>	Retain as operationally written and review once NPS-IB has been gazetted but include wording changes referring to mana whenua.
<b>S62 Philip Clegg</b>	S62.019	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	<p>The NPS-IB hasn't yet been released following consultation on the exposure draft. The exposure draft indicated that SNA area plans would need to be notified within 5 years from the commencement date (which we won't know until the NPS-IB is promulgated).</p> <p>The June 2025 date will put unnecessary pressure on already overloaded local authorities to produce SNA maps that are based on criteria not yet released in the NPS-IB. That will likely impact on time for community consultation, and result in further erosion of public support for SNAs.</p>	Withdraw policy until the NPS-IB has been released, and when the policy is ready to be notified, delete " <del>30 June 2025</del> " and replace with " <b>within 5 years from the commencement date of NPS-IB</b> ".

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S79 South Wairarapa District Council</b>	S79.034	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	While the Wairarapa Combined District Plan has contained SNA's for at least 12 years, further assessment and ground truthing is estimated for the South Wairarapa District to cost a minimum of \$600,000. This equates to an approximately 3% increase in rates. The last two rating years has seen a 28% increase in rate, largely to provide for improved infrastructure. The work is not funded as part of the LTP and would have to go out for consultation in the 23/24 year and be completed in one financial year. This is unlikely achievable given that funds would need to be provided, field work undertaken, then plan changes complete in a 12 month period. Other substantial capital costs related to infrastructure are anticipated in that period as well. The requirement is unaffordable to the ratepayers of South Wairarapa in its current form.	Require the Greater Wellington Regional Council to fund and undertake the necessary work required to comply with the policy.
<b>S96 Sarah (Dr) Kerkin</b>	S96.015	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	The NPS-IB hasn't yet been released following consultation on the exposure draft. The exposure draft indicated that SNA area plans would need to be notified within 5 years from the commencement date (which we won't know until the NPS-IB is promulgated). The June 2025 date will put unnecessary pressure on already overloaded local authorities to produce SNA maps that are based on criteria not yet released in the NPS-IB. That will likely impact on time for community consultation, and result in further erosion of public support for SNAs.	Withdraw policy until the NPS-IB has been released, and when the policy is ready to be notified, delete " <del>30 June 2025</del> " and replace with " <b>within 5 years from the commencement date of NPS-IB</b> ".
<b>S115 Hutt City Council</b>	S115.047	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and	Oppose	We seek the deletion of all the proposed provisions relating to indigenous biodiversity until the upcoming National Policy Statement on Indigenous Biodiversity is gazetted.	Delete amendments to Policy 23 and retain the Operative RPS Policy 23. Failing that, amend the deadline from 30 June 2025 to 5 years after RPS Change 1 becomes operative.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans			
<b>S123 Peter Thompson</b>	S123.014	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	This should have been completed years ago - the timeline of 2025 is useful	Retain as notified.
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.071	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	<p>Ātiawa supports identifying and protecting indigenous ecosystems and habitats. Indigenous ecosystems and habitats not only play a vital role in ensuring the health, well-being and balance of te taiao, but also provide for mana whenua values such as mauri, wairua, whakapapa and mana. When our indigenous ecosystems are flourishing and abundant it enables Ātiawa to interact with te taiao to undertake activities which enhance our relationship with te taiao, thereby strengthening our identity. Ātiawa supports subclause (e) which enables mana whenua to identify indigenous ecosystems and habitats that are significant to mana whenua.</p> <p>Therefore mana whenua seek to work in partnership with local authorities to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values.</p> <p>Ātiawa seek clarity on why the timeframe (30 June 2025) has been extended by one year compared to the pre-notified version date of 30 June 2024.</p>	<p>Amend to:</p> <p>By 30 June 2025, district and regional plans, <b>in partnership with mana whenua</b> shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				Atiawa are concerned that indigenous ecosystems and habitats that don't meet criteria to be considered 'significant' will then be perceived as okay to modify and destroy. We do not support this and seek that the Regional Council avoid this from occurring.	
<b>S133 Muaūpoko Tribal Authority</b>	S133.020	Policy 23: Identifying indigenous ecosystem s and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Supports the inclusion of a deadline for completion of indigenous biodiversity identification. However, we request consultation with Muaūpoko be included.	Include process for consultation with Muaūpoko.
<b>S140 Wellington City Council (WCC)</b>	S140.048	Policy 23: Identifying indigenous ecosystem s and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	Reason set out in 'general' section above.	Remove deadline.
<b>S144 Sustainabl e Wairarapa Inc</b>	S144.019	Policy 23: Identifying indigenous ecosystem s and habitats with	Support	This should have been completed years ago - the timeline of 2025 is useful	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant indigenous biodiversity values - district and regional plans			
<b>S147 Wellington Fish and Game Council</b>	S147.020	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	The suggested amendments follows from the suggested amendment to Objective 16, and are intended to give better effect to the NPS-FM (including Policy 10). It is important to identify which habitats have strong indigenous biodiversity values. It is equally important to recognise that other habitats, while not indigenous dominant, are valuable and require identification and also protection.	Amend title: Identifying indigenous ecosystems, and habitats with significant indigenous biodiversity <b>or other</b> values, in district and regional plans
<b>S147 Wellington Fish and Game Council</b>	S147.021	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	The suggested amendments follows from the suggested amendment to Objective 16, and are intended to give better effect to the NPS-FM (including Policy 10). It is important to identify which habitats have strong indigenous biodiversity values. It is equally important to recognise that other habitats, while not indigenous dominant, are valuable and require identification and also protection.	Amend text: By 30 June 2025, district and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity <b>and other</b> values; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:
<b>S147 Wellington Fish and Game Council</b>	S147.022	Policy 23: Identifying indigenous ecosystems and habitats with	Support in part	The suggested amendments follows from the suggested amendment to Objective 16, and are intended to give better effect to the NPS-FM (including Policy 10). It is important to identify which habitats have strong indigenous biodiversity values. It is equally important to recognise that other habitats, while not indigenous	New subclause: <b>(f) The habitat supports significant populations of trout, salmon or other valued introduced species together with indigenous species.</b>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant indigenous biodiversity values - district and regional plans		dominant, are valuable and require identification and also protection.	
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.040	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	WIAL is concerned that the broad framing of this significance criteria will likely mean significant areas of the region are identified as being a significant natural area. This criteria could potentially capture highly modified areas which cannot sensibly be identified as significant natural areas. WIAL also notes that the National Policy Statement for Indigenous Biodiversity is pending. It is likely that this will contain criteria that will be different to the RPS. It may therefore be appropriate to await the outcome of this policy document to ensure consistency.	Ensure this provision is consistent with national guidance, or alternatively ensure the criteria is appropriately targeted so that it does not inadvertently capture areas which do not sensibly comprise significant natural areas or delete the policy
<b>S158 Kāinga Ora Homes and Communities</b>	S158.023	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Seeks that this policy is aligned within the NPS-IB once gazetted.	Amend the policy to align with the NPS-IB once gazetted.
<b>S162 Winstone Aggregates</b>	S162.008	Policy 23: Identifying indigenous ecosystems and habitats with	Oppose	This policy requires identifications of ecosystems and habitats with significant indigenous biodiversity values by 2025. However, there is no policy that requires plans to manage effects on these areas in any way. Policy 24 relates to the ecosystems in Appendix 1A, rather than linking with Policy 23.	Reject the proposed changes to this policy. Undertake mineral mapping at the same time as the SNA mapping and ensure that a viable pathway being provided for quarrying and clean filling activities within those identified areas.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant indigenous biodiversity values - district and regional plans		<p>The RPS seeks to implement the Exposure Draft of the NPS-IB. Concerned about the extent that the RPS seeks to implement a draft version of the NPS-IB that will inevitably change before coming into force and questions the timing of these amendments. There is no requirement to give effect to a draft NPS-IB. Policy package 2 identified in the s32 Report would have been more appropriate, which maintained status quo until the NPS-IB content has been confirmed (s32 page 132), particularly given the high cost and complexity of assessment and impact on property owners and short timeframe that the RPS introduces (June 2025 which is 2.5 years less than the proposed NPS-IB) for Councils to map and identify these areas. Meeting "objectives" earlier is not a benefit when those objectives at a National level remain uncertain. It is unclear if Policy 23 gives effect to the Draft NPS-IB.</p> <p>There is often direct conflict between areas of land that contain regionally significant mineral deposits and land that contains significant indigenous biodiversity values due to this land being set aside for future aggregate extraction. The s32 evaluation fails to consider the costs of this.</p> <p>The s32 report (p191) states that the direction to local authorities to identify significant biodiversity values has been in the RPS since 1995, but this has not occurred. It also fails to mention that the RPS Method 52 currently provides for GWRC mapping of regionally significant minerals deposits, which also has not yet taken place. Seek that this work be completed by GWRC and a better framework developed to recognise the importance of access to aggregate and role in growth.</p> <p>Policy 23 does not currently contain defined terms and no amendments are proposed to the wording of most of the policy. However it deals with concepts that are likely to be impacted by proposed new definitions in Appendix 3 terms for example Policy 23(d)(i) deals with ecological assessment of an area, including the extent</p>	

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				the ecosystem 'enhances connectivity.' It is unclear how this relates to the new definition of ecological connectivity, same can be said for the proposed new definitions of ecological integrity, ecological health, naturally uncommon ecosystems it is unclear how these interact or impact on how policy 23 will be interpreted.	
<b>S163 Wairarapa Federated Farmers</b>	S163.058	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	The case for urgent identification and evaluation of habitats with significant indigenous biodiversity values by 30 June 2025 has not been made and will likely to be a waste of effort and resources doing such assessment in advance of a National Policy Statement on Indigenous Biodiversity.	That the amendments to Policy 23 be deleted Delete the FW icon.
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.056	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Concerned that some councils have still not identified SNAs in their plans e.g. the recently notified Wellington DP does not include residential SNAs. Other councils have not identified SNAs at all yet. We strongly support the inclusion of a June 2025 deadline, as delaying any further is contrary to s6(c). However, we see a risk for councils such as Wellington CC, that have done the work to identify SNAs but have not included them in the plan. We submitted on the Wgtn DP that the residential SNAs should be immediately reincluded. Allowing a further 3 years in those circumstances is unacceptable. We therefore seek amendment to how the deadline is expressed.	Amend as follows (or words to the same effect): <b>"As soon as possible, and in any event no later than by-30 June 2025"</b> Amend explanation accordingly.
<b>S167 Taranaki Whānui</b>	S167.087	Policy 23: Identifying indigenous ecosystems and habitats with	Support	Taranaki Whānui support the amendment of this policy. We support the inclusion of a timeframe.  Taranaki Whānui will work in partnership to identify areas outlined in (e).	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant indigenous biodiversity values - district and regional plans		We note the Method 32 to implement this policy and are keen to see assurances regarding resourcing.	
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.072	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	Rangitāne o Wairarapa support the inclusion of a deadline for completion of indigenous biodiversity identification.	Retain as notified
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.033	Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Not Stated / Neutral	<p>Policy 23 and Policy 24 identifying and protecting Significant Natural Areas (SNAs) are a critical part of the RPS. It is concerning these values to be identified by June 2024. Policy 23 and 24 have been in effect for a long time and is not ideal some Councils have not given effect to these Policies and / or gave effect partially, either to include just Public SNAs and leaving out the private land areas.</p> <p>It is crucial that councils that are tentatively holding space for these policies implement Policy 23 and 24 since District Plans to map, identify the SNAs, and undertake public consultation, and finally performing plan change to give effect to SNAs protection in the form of provisions are long processes that jeopardise the protection of SNAs.</p> <p>An important development that involves the implementation of Policy 23 and 24, is the Ministry for the Environment released the exposure draft for the National Policy Statement Indigenous Biodiversity (NPS-IB). This means there will be further policy implications to Regional Plan and District Plans. Since</p>	Ensure the provisions give effect to recent national direction.

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				the exposure draft is accepting public submissions, it will be sometime for policies to take effect then to be implemented in Regional and District Plans. The intention of Policy 23 and 24 becomes more important where all Councils are about to give effect to National Policy Statement-Urban Development (NPS-UD) prioritising housing and development needs. It is critical that SNAs are provided protection in this uncertain environment where the Councils still to give effect to NPS-IB but will give effect to NPS-UD before National Policy Statement - Freshwater Management (NPS-FM) and NPS-IB start to take effect providing protection for our freshwater and indigenous ecosystems. Note that these NPSs are not synchronised, it is imperative Policy 23 and 24 ensures the Plan is given effect as soon as practicable.	
<b>S10 Transpower New Zealand Limited</b>	S10.002	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	Transpower is concerned that the amendments to Policy 24 are overly broad in their application and potentially impractical to implement in practice. They do not recognise that some infrastructure has a functional or operational need to be constructed or operated in certain locations. In some situations this may mean that biodiversity offsetting or biodiversity compensation is required. Furthermore, Appendix 1A is very extensive in the ecosystems and specifies it applies to.	Amend Policy 24 to recognise that regionally significant infrastructure may have a functional or operational need to locate in a particular location. This could be achieved by adding a qualifying statement: <b>This does not apply to nationally and regionally significant infrastructure that has a functional or operational need to locate in a particular location. In the case of the National Grid, following a route, site and method selection process and having regard to the technical and operational constraints of the network, new development or major upgrades of the National Grid shall seek to avoid adverse effects, and otherwise remedy or mitigate adverse effects, on ecosystems or habitats with significant indigenous biodiversity values.</b>
<b>S16 Kāpiti Coast District Council</b>	S16.067	Policy 24: Protecting indigenous ecosystems and habitats	Support in part	Council has the same concerns regarding the arbitrary timeframe as we raise under Policy 23 above.  Council supports the amendments to the policy that provide useful direction on how to consider biodiversity offsetting and biodiversity compensation. Such	Delete timeframe for giving effect to the policy. Amend to include the resource consent process.

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		with significant indigenous biodiversity values - district and regional plans		guidance would also be useful for the consideration of resource consents and notices of requirement.	
<b>S25 Carterton District Council</b>	S25.028	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>As per submission on Policy 23, CDC opposes the amendments to require that SNAs are identified by June 2025.</p> <p>CDC also considers that, due to the breadth of ecosystems and habitats included in Appendix 1A, the revised policy will effectively provide for no offsetting or compensation opportunities across many parts of the region.</p>	Revert to original text of Policy 24.
<b>S30 Porirua City Council</b>	S30.048	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>Council supports this policy being timebound in principle. It has already been given effect to through our PDP. However, Policy EI.1 requires a first principles approach to SNA identification and protection which would make it challenging for any council to meet this.</p> <p>The government has released an exposure draft of the NPS-IB which sets out additional requirements and a longer implementation timeframe. The RPS should align with these if/when the NPS-IB is gazetted.</p>	<p>Amend policy to either:</p> <ul style="list-style-type: none"> <li>• remove 2025 time frame; or</li> <li>• align with NPS-IB timeframes once gazetted; or</li> <li>• provide for councils that have mapped and protected all SNA in their plan to give effect to this policy through their next full district plan review.</li> </ul>
<b>S32 Director-General of Conservation</b>	S32.019	Policy 24: Protecting indigenous ecosystems and habitats	Support	These proposed provisions are generally appropriate. However, if an NPS for Indigenous Biodiversity is gazetted prior to decisions being made on the provisions, then they should be reviewed for compliance with that document.	Retain as notified, subject to any changes which may be required to give effect to an NPS for Indigenous Biodiversity.

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		with significant indigenous biodiversity values - district and regional plans			
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.075	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	Council fundamentally disagrees with going ahead in advance of NPS-IB being gazetted but notes that the intent of the provision by could be useful if the provision remains.	Retain as operationally written and review once NPS-IB has been gazetted.
<b>S79 South Wairarapa District Council</b>	S79.035	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	Support more clarity on the use of biodiversity offsetting. There is some concern in terms of the requirement of a 'minimum' 10% uplift and whether this meets the requirements of s.108AA when being applied.	Retain as notified
<b>S100 Meridian Energy Limited</b>	S100.016	Policy 24: Protecting indigenous ecosystems and habitats	Oppose in part	The reason for inclusion of some habitats, ecosystems and species in Appendix 1A is not clear. The section 32 report does not make a case for a requirement for a minimum +10% gain in biodiversity. The proposed requirement is premature, pending gazettal of the National Policy Statement for Indigenous Biodiversity	Delete clause (c); and Delete clause (d) or, in the alternative, replace clause (d) with a requirement for at least no net loss (and preferably a net gain) as follows (or similar) and amend the explanation to match the policy amendments: "By 30 June 2025, Ddistrict and regional plans shall include

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		with significant indigenous biodiversity values - district and regional plans		(currently under development). The exposure draft of the NPS signalled a 'net gain' approach but did not specify a minimum proportion of gain. The provisions of the proposed Natural Resources Plan on this point were settled, in early 2022, following mediation and the agreed outcome was a 'no net biodiversity loss' outcome. The proposed amendments to RPS Policy 24 undo the valuable work done through mediation of the PNRP appeals and are not supported by a robust s. 32. evaluation. Until clear guidance is provided by a gazetted NPS, the RPS should adopt the settled approach of the PNRP. The settled provisions of Schedule G2 of the PNRP include a definition of 'no net biodiversity loss' which could usefully be included in the RPS.	<p>policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development. Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall:</p> <p>(a) ...                  (b) ...                  (c) <del>ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation);</del>                  (d) require that the outcome sought from the use of biodiversity offsetting is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit.</p> <p><b>achieves at least no net loss and preferably a net gain of biodiversity.</b></p> <p>....                  Explanation                  Policy 24 applies to provisions in regional and district plans.                  The policy provides clarity about the limits to, and expected outcomes from, biodiversity offsetting and biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values.                  Ecosystems and species known to meet the criteria in clauses (a and b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation).<del>Calculating a 10 percent net biodiversity gain (offsetting) or a 10 percent net biodiversity benefit (compensation) employs the same or a similar calculation methodology used to determine 'no net loss or preferably net gain' under</del></p>

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					<p><del>a standard offsetting approach. The distinction between 'net gain' and 'net benefit' is to recognise that the outcomes achievable through the use of offsetting and compensation are different.</del> An offsetting 'net biodiversity gain' outcome is expected to achieve an objectively verifiable increase in biodiversity values while a compensation 'net biodiversity benefit' outcome is more subjective and less preferable.'</p>
<p><b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b></p>	<p>S102.056</p>	<p>Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans</p>	<p>Support in part</p>	<p>Generally supports Policy 24. However, Policy 24 should be changed to include text to state that biodiversity offsetting should not be provided for "where it is not appropriate". This will provide greater clarity as there will likely be instances where offsetting is possible but not appropriate, particularly for whenua Māori.</p>	<p>Amend Policy 24 subclause (a)(i) as follows: (a) not provide for biodiversity offsetting:  (i) where <b>it is not appropriate</b>, there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or</p>
<p><b>S114 Fulton Hogan Ltd</b></p>	<p>S114.002</p>	<p>Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans</p>	<p>Support in part</p>	<p>This policy appears to respond to the guidance provided by the NPS-IB, which is currently in draft. This policy should respond to the final version of the NPS-IB.</p>	<p>Retain as notified</p>



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<b>S115 Hutt City Council</b>	S115.048	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	If the provisions are nonetheless added, then HCC seeks an amendment to the deadline date from 30 June 2025 to 5 years from the operative date of the proposed RPS change 1. This is because the deadline does not align with the deadline proposed in the most recent draft of the National Policy Statement on Indigenous Biodiversity (5 years from the commencement date of that NPS).	Delete amendments to Policy 24 and retain the Operative RPS Policy 24. Failing that, amend the deadline from 30 June 2025 to 5 years after RPS Change 1 becomes operative.
<b>S123 Peter Thompson</b>	S123.015	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	This should have been completed years ago - the timeline of 2025 is useful	Retain as notified.
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.072	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	While Ātiawa supports provisions to protect indigenous ecosystems and habitats from inappropriate subdivision, use and development. Ātiawa opposes the use of biodiversity offsetting and biodiversity compensation methods where an ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana whenua). We seek to work in partnership with Regional Council to identify ecosystems and habitats that contain mana whenua values.	Amend to include new subclause: (a) not provide for biodiversity offsetting: (i) where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or (ii) when an activity is anticipated to causes residual adverse effects on an area after an offset has been implemented if the ecosystem or species is threatened or the ecosystem is naturally uncommon; <b>(iii) the ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana whenua).</b> (b) not provide for biodiversity compensation where an

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					activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally uncommon, <b>or, the ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana whenua).</b> ;
<b>S134 Powerco Limited</b>	S134.011	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	The requirement for a minimum 10% net biodiversity gain or benefit is not clear and is not justified in the section 32 report. This is more onerous than the direction set in the exposure draft of the NPS Indigenous Biodiversity around biodiversity gains or benefits. It is also more onerous than the requirement set by the Proposed Natural Resources Plan (PNRP), which sets an outcome of no net biodiversity loss. In lieu of clear direction being set through a gazetted NPS Indigenous Biodiversity, the RPS should be amended to adopt the approach set by the PNRP.	In lieu of the NPS Indigenous Biodiversity being gazetted, amend Policy 24 to ensure the requirements around offsetting are no more onerous than those set out in the Proposed Natural Resources Plan (PNRP), which sets an outcome of no net biodiversity loss. This could be achieved by making changes as follows or to the same effect: "By 30 June 2025, district and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development. Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall: ... (d) require that the outcome sought from the use of biodiversity offsetting <del>is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit.</del> achieves no net biodiversity loss. Explanation Policy 24 applies to provisions in regional and district plans ...Calculating a 10 percent net biodiversity gain (offsetting) or a 10 percent net biodiversity benefit (compensation) employs the same or a similar calculation methodology used to determine 'no net loss or preferably net gain' under a standard offsetting approach. The distinction between 'net gain' and 'net benefit' is to recognise that the

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					<del>outcomes achievable through the use of offsetting and compensation are different..."</del>
<p><b>S137 Greater Wellington Regional Council (GWRC)</b></p>	<p>S137.018</p>	<p>Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans</p>	<p>Support in part</p>	<p>Amendments are required to improve readability and clarity.</p>	<p>Amend Policy 24 as follows: By 30 June 2025, district and regional plans shall include policies, rules and/or methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development.</p>
<p><b>S137 Greater Wellington Regional Council (GWRC)</b></p>	<p>S137.019</p>	<p>Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans</p>	<p>Support in part</p>	<p>Amendments are required to improve readability and clarity.</p>	<p>Amend Policy 24 as follows:</p> <p>Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall:</p> <p>(a) not provide for biodiversity offsetting:</p> <p>(i) where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or</p> <p>(ii) when an activity is anticipated to cause residual adverse effects on an area after an offset has been implemented, if the ecosystem or species is threatened, or the ecosystem is naturally uncommon;</p> <p>(b) not provide for biodiversity compensation where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally</p>

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					<p>uncommon;<del>and (c) ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation);</del>  <b>(eC) require that the outcome sought from the use of biodiversity offsetting is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit. Ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation).</b></p>
<p><b>S137 Greater Wellington Regional Council (GWRC)</b></p>	<p>S137.020</p>	<p>Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans</p>	<p>Support in part</p>	<p>Amendments are required to improve readability and clarity.</p>	<p>Add to bottom of explanation: <b>Policy 47 determines which activities are 'inappropriate', being those that may adversely affect certain key ecological characteristics of an area.</b></p>
<p><b>S140 Wellington City Council (WCC)</b></p>	<p>S140.049</p>	<p>Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values -</p>	<p>Oppose</p>	<p>Reason set out in 'general' section above.</p>	<p>Remove deadline.</p>

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		district and regional plans			
<b>S144 Sustainable Wairarapa Inc</b>	S144.020	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	This should have been completed years ago - the timeline of 2025 is useful	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.023	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	The suggested amendment is intended to give better effect to the NPS-FM (including Policy 10). While the protection of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	Amend title and text: Policy 24: protecting indigenous ecosystems, and habitats with significant biodiversity <b>or other</b> values, in district and regional plans By 30 June 2025, district and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity <b>or other</b> values from inappropriate subdivision, use and development. Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity <b>or other</b> values, they shall:
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.041	Policy 24: Protecting indigenous ecosystems and	Oppose	This policy is inappropriate in that it sets out limits and constraints as to when offsetting and compensation are available. These criteria are limiting and are written as a bottom line or hard limit. If they are not met the option	Delete the proposed amendments to the policy including the limits associated with offsetting and compensation within this policy (a) - (d).

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		habitats with significant indigenous biodiversity values - district and regional plans		<p>of offsetting and/or compensation is no longer available to be used as part of any effects management response. These limits will likely foreclose offsetting and/or compensation even where it is likely to result in beneficial ecological or biodiversity outcomes in the region.</p> <p>The restrictions also depart from RMA section 104(1)(ab) which states that a consent authority "must" have regard to: "any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity".</p> <p>Furthermore, RMA section 104(1)(b)(iii) requires that a consent authority "must" have regard to any relevant provisions of a National Policy Statement. While not yet operative, the draft NPSIB provides some direction about when consideration of biodiversity offsetting should be precluded from consideration - being circumstances when:</p> <p>(i) Residual adverse effects cannot be offset because of the irreplaceability or vulnerability of the indigenous biodiversity affected.</p> <p>(ii) There are no technically feasible or socially acceptable options by which to secure gains within acceptable timeframes.</p> <p>(iii) Effects on indigenous biodiversity are uncertain, unknown or little understood, but potential effects are significantly adverse.</p> <p>This is far more balanced and likely to give rise to good environmental outcomes through offsetting, while avoiding the loss of very important or irreplaceable biodiversity.</p>	
<b>S158 Kāinga Ora Homes and Communities</b>	S158.024	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous	Support in part	Seeks that this policy is aligned within the NPS-IB once gazetted.	Amend the policy to align with the NPS-IB once gazetted.

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		biodiversity values - district and regional plans			
<b>S162 Winstone Aggregates</b>	S162.009	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>There are significant issues with the proposed policy, including-</p> <ul style="list-style-type: none"> <li>• It is worded as a method, not a policy and therefore it is inappropriate to include in the policy framework.</li> <li>• It is unclear how this links with Policy 23 - are the ecosystems and habitats identified in Appendix 1A done so in accordance with Policy 23, or additional to that Policy? The reference to Policy 23 in the explanation fails to clarify this.</li> <li>• The basis for limiting offsetting and compensation is unclear.</li> </ul> <p>There is no national direction requiring these limits and there is no justification provided in the s32 report.</p> <ul style="list-style-type: none"> <li>• The language used in Policy 24 and the proposed method "no appropriate" "knowledge," "proven methods," species "known" is uncertain and introduces a subjective standard into a complex area which is inappropriate. It also removes the ability for even low risk adaptive management and new methodology/advances in ecological understanding.</li> <li>• Policy 24(a)(i) could be interpreted to suggest that where a district council does not have the necessary ecological expertise, it should not provide for offsetting in its district plan therefore making it unavailable to all applicants.</li> <li>• The wording in the explanation is equally confusing and uncertain in terms of "same," "or similar" calculation methodology. Implementation of these policies at a district</li> </ul>	Reject the proposed changes to this policy and delete any corresponding references to it.

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				<p>level will result in provisions that will arguably prevent reasonable use of private land. Council has a duty to ensure that there is certainty as to when these limits are intended to apply.</p> <ul style="list-style-type: none"> <li>• The list in Appendix 1A covers an enormous area of the region and limiting the use of offsetting and compensation in these areas has the potential to effectively halt any large-scale (and a lot of small-scale) development entirely, sterilising these sites.</li> </ul> <p>It would therefore appear that Policy 24 seeks the creation of a new raft of prohibited activities for activities where effects could not be avoided or mitigated, and would not allow for a site-specific consideration of effects, nor for consideration of other competing matters. The evidential basis for this approach is unclear and is not described in the s32 report.</p> <ul style="list-style-type: none"> <li>• Taking an 'species based' blanket approach is entirely inappropriate.</li> <li>• The explanation in Appendix 1A provides greater clarity as to how Policy 24 is intended to operate than the explanation to Policy 24 itself. If retained, the wording in Appendix 1A should be shifted into Policy 24.</li> </ul> <p>The s32 report does not acknowledge the potential significant costs of the policy from the limits it would place on key developments, including infrastructure and mineral extraction.</p> <p>It describes Policy 24 (p191 s32) as a "regional interpretation" for the limits to the use of biodiversity offsetting and</p>	



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				compensation is entirely unwarranted. It is unclear what this means and why this has been applied.	
<b>S163 Wairarapa Federated Farmers</b>	S163.059	Policy 24: Protecting indigenous ecosystem s and habitats with significant indigenous biodiversity values - district and regional plans	Oppose	<p>Concern that these matters have very recently been the subject of mediated agreements during the pNRP Hearing and are being relitigated through RPS Change One.</p> <p>Concern that this provision is more ambitious and precautionary than the exposure draft of the NPS-IB and that there is almost a blanket prohibition on offsets. Other concerns include that this policy may be significantly at odds with aspirations to increase "nature based solutions" (NBS), eg, creating or restoring wetlands and that offsets cannot be proposed in any forest remnants outside the Tararuas. Refer to submission for more detail on other concerns with this policy.</p>	That the amendments to Policy 24 be deleted Delete the FW icon
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.057	Policy 24: Protecting indigenous ecosystem s and habitats with significant indigenous biodiversity values - district and regional plans	Support in part	<p>Any delay to protecting SNAs should be the shortest possible.</p> <p>The requirement in policy 24(a)(i) should apply equally to compensation. Where compensation is proposed by an applicant, there must be sufficient certainty that the techniques, methods, site etc are appropriate to achieve the claimed biodiversity outcomes, even where those aren't quite an offset. This policy only deals with the limits to offsetting and compensation. However, district plans may not include full sets of principles. Including a full set in the RPS would aid consistency across the district plans. Additionally, Policy 47 directs considerations of the limits to offsetting in policy 24, but not any of the other generally accepted parameters for offsetting and compensation. Policy 24(c) could be misinterpreted as indicating only those areas and species identified in Appendix 1A are covered.</p> <p>Oppose Policy 24(d) as drafted. The reference to a net biodiversity benefit adds a new concept that is unnecessary and adds complexity. The reference to a 10% gain or benefit is inappropriate. It is arbitrary and meaningless,</p>	<p>Amend as follows (or words to the same effect):</p> <p><b>"As soon as possible, and in any event no later than by 30 June 2025"</b></p> <p>Amend to apply the requirement in pol. 24(a)(i) to compensation.</p> <p>Include a full set of offsetting and compensation principles either in policy 24 or elsewhere in the RPS.</p> <p>Amend Policy to make it clear that the list is not exhaustive and if species or ecosystems meeting the criteria are identified elsewhere, they are covered by the policy.<b>Delete Policy 24(d).</b></p> <p>Amend explanation accordingly.</p>

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				especially in the context of compensation. The 10% requires some form of calculation of losses and gains and presupposes there is adequate information about the ecosystem that allows for such a calculation. There are situations where there may not be adequate information upon which to make such a calculation with the necessary level of accuracy.	
<b>S166 Masterton District Council</b>	S166.030	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Not Stated / Neutral	This is currently being looked at as part of the Wairarapa Combined District Plan review, as part of the NPS Indigenous Biodiversity.	No decision sought.
<b>S167 Taranaki Whānui</b>	S167.088	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	Categories of offset. Appendix 1A.	Taranaki Whānui are concerned that adding a pathway for biodiversity offsetting and compensation will inherently create a pathway for further adverse impacts. Taranaki Whānui feel strongly that mana whenua needs to partner in the development, management/regulation, and monitoring of this policy. [Note: the decision sought in this submission point cross-references to the decision sought in relation to Appendix 1A in S167.0192.]
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.073	Policy 24: Protecting indigenous ecosystems and habitats	Oppose in part	The intention of the amendments to Policy 24 is supported, including the addition of a timeframe. However, Rangitāne o Wairarapa considers that amendments are required to ensure that the policy achieves its intent and provides clear outcomes.	Accurately reflect the role of offsetting and compensation as provided for by the Exposure Draft of the NPS IB; Be consistent with and give effect to the NPS IB (on the presumption this is expected to be gazetted before the plan change hearings commence, and on the basis the wording of the NPS is unlikely to change), particularly with respect to the

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		with significant indigenous biodiversity values - district and regional plans		<p>The use of the term 'enable' is inappropriate in this context. Biodiversity Offsetting and Biodiversity Compensation are measures to be considered once all other management measures have been explored and discounted. The wording should accurately reflect the role of offsetting and compensation.</p> <p>The wording of the policy does not accurately reflect the intention of the Exposure Draft of the NPS IB, particularly with regard to the limits to offsetting and compensation. It is not helpful to paraphrase the Exposure Draft NPS IB policy where no additional local context is provided.</p>	limits to offsetting and compensation,
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.074	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	Clause (c) in particular, does not make grammatical sense and it is therefore difficult to understand how it will achieve the intended outcomes.	Amend clause c so that it makes grammatical sense,
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.075	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Oppose in part	There are additional principles to offsetting and compensation provided in the NPS IB, the offsetting principles are particularly important. A reference to these principles and the NPS IB in the supporting text would be helpful in highlighting this.	Ensure the policy wording and proposed definitions adopt a consistent approach with respect to the 10% net gain for offsetting and 10% net benefit for compensation.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<p><b>S168 Rangitāne O Wairarapa Inc</b></p>	<p>S168.076</p>	<p>Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans</p>	<p>Not Stated / Neutral</p>		<p>The inclusion of known ecosystems and species that meet the limiting criteria in Appendix 1A is supported for clarity, acknowledging that this list is not necessarily limiting and additional ecosystems or species may be included.</p>
<p><b>S170 Te Rūnanga o Toa Rangatira</b></p>	<p>S170.034</p>	<p>Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans</p>	<p>Not Stated / Neutral</p>	<p>Policy 23 and Policy 24 identifying and protecting Significant Natural Areas (SNAs) are a critical part of the RPS. It is concerning these values to be identified by June 2024. Policy 23 and 24 have been in effect for a long time and is not ideal some Councils have not given effect to these Policies and / or gave effect partially, either to include just Public SNAs and leaving out the private land areas.</p> <p>It is crucial that councils that are tentatively holding space for these policies implement Policy 23 and 24 since District Plans to map, identify the SNAs, and undertake public consultation, and finally performing plan change to give effect to SNAs protection in the form of provisions are long processes that jeopardise the protection of SNAs.</p> <p>An important development that involves the implementation of Policy 23 and 24, is the Ministry for the Environment released the exposure draft for the National Policy Statement Indigenous Biodiversity (NPS-IB). This means there will be further policy implications to Regional Plan and District Plans. Since the exposure draft is accepting public submissions, it will be sometime for policies to take effect then to be implemented in Regional and District Plans.</p> <p>The intention of Policy 23 and 24 becomes more important where all Councils are about to give effect to National Policy Statement-Urban Development (NPS-UD) prioritising housing and development needs. It is</p>	<p>Ensure the provisions give effect to recent national direction.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				critical that SNAs are provided protection in this uncertain environment where the Councils still to give effect to NPS-IB but will give effect to NPS-UD before National Policy Statement - Freshwater Management (NPS-FM) and NPS-IB start to take effect providing protection for our freshwater and indigenous ecosystems. Note that these NPSs are not synchronised, it is imperative Policy 23 and 24 ensures the Plan is given effect as soon as practicable.	
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.035	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	The clause (a) of this Policy, that the offsetting should not be applied if the species or ecosystems are threatened, or the ecosystem is uncommon is supported.	Retain (a) as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.080	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Not Stated / Neutral	<p>It is unclear how the clause (b) come to the number 'at least 10%'. How do we identify the benefits of and understand the results of 10%? How do we make sure that the biodiversity compensation is adequate or enough to protect what we want to protect?</p> <p>Given that most of the species and ecosystems in Greater Wellington, in part, are limited, in danger or threatened, we are unsure the biodiversity value loss and gain can be in balance.</p>	Ensure biodiversity compensation is adequate or enough to protect what we want to protect.
<b>S16 Kāpiti Coast District Council</b>	S16.062	Policy IE.1: Giving effect to mana whenua /	Oppose	Although the principle of the policy is not opposed, Council notes the proposed policy is not supported by any legislative requirements under the RMA or higher level statutory planning processes, yet it imposes significant additional costs on city and district councils	Delete Policy IE.1.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		tangata whenua roles and values when managing indigenous biodiversity - district and regional plans		<p>though requiring changes to district plans to give effect to it. This makes it difficult to justify under section 32 of the RMA.</p> <p>Council notes it is a common theme within the plan change that the draft NPS-IB is proposed to be implemented in the RPS despite the NPS-IB not being in force or in its final form - and therefore the NPS- IB lacks any legal weight under the RMA.</p>	
<b>S30 Porirua City Council</b>	S30.049	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support	<p>The requirement to partner with mana whenua in the development of district plans is broader than what this policy addresses. It is already a requirement of s8 of the RMA, if it is to be repeated in the RPS it should be a separate overarching policy. Such a policy should also provide meaningful direction as to the actions that should be taken in respect of partnering.</p> <p>Further, it is possible that this policy will not align with the NPS-IB, the exposure draft released by the Government did not allow the effects management hierarchy to be applied to a broad range of effects including any removal of indigenous vegetation.</p>	Either delete this policy, or amend in line with the gazetted NPS-IB but only where it will provide additional guidance at a regional level in consultation with mana whenua.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.083	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity	Support	<p>Notwithstanding the general comments on waiting for the NPS- IB, we support the need to recognise mana whenua values.</p> <p>However, the district or regional plan components of this method need to occur once the NPS-IB has been gazetted, in order to avoid duplication and unnecessary waste of Council effort, mana whenua resources and ratepayer's money.</p>	Retain provision as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		- district and regional plans			
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.057	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	Generally support Policy IE.2. However, Policy IE.1 should include a provision for giving local effect to Te Rito o te Harakeke, to be consistent with Policy IE.2. Furthermore, Policy IE.1 should allow for Māori landowners to exercise kaitiakitanga on their whenua as not all Māori within the same iwi or hapū have the same tikanga when managing and monitoring indigenous biodiversity on their land.	Amend Policy IE.1 clause (a) as follows: (a) apply mātauranga Māori frameworks, and support mana whenua / tangata whenua <b>and Māori landowners</b> to exercise their kaitiakitanga, in managing and monitoring indigenous biodiversity, <b>including giving effect to Te Rito o te Harakeke.</b>
<b>S115 Hutt City Council</b>	S115.049	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Oppose	If the provisions are nonetheless added, then HCC seeks an amendment to the deadline date from 30 June 2025 to 5 years from the operative date of the proposed RPS change 1. This is because the deadline does not align with the deadline proposed in the most recent draft of the National Policy Statement on Indigenous Biodiversity (5 years from the commencement date of that NPS).	Delete new Policy IE.1.
<b>S131 Ātiawa ki Whakaron gotai</b>	S131.073	Policy IE.1: Giving effect to mana	Support	Ātiawa supports the role of mana whenua to be recognised and provided for through Policy IE.1. The policy clearly sets out ways to	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Charitable Trust		whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans		enable mana whenua to exercise their kaitiakitanga.	
S133 Muaūpoko Tribal Authority	S133.022	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	Supports the requirement to partner with mana whenua/tangata whenua, but request that Muaūpoko are also recognised.	Recognise Muaūpoko as also having connection to indigenous biodiversity in Te-Whanganui-a-Tara. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te Whanganui-a-Tara is recognised.
S140 Wellington City Council (WCC)	S140.050	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous	Support	This policy should be clear in the text that it relates to indigenous biodiversity management.	Amend with this text, or similar: <b>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan, as it relates to managing indigenous biodiversity for subdivision, use or development, particular regard shall be given to enabling mana whenua / tangata whenua to exercise their role as kaitiaki ...</b>



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		biodiversity - district and regional plans			
<b>S147 Wellington Fish and Game Council</b>	S147.034	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported. At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords Regional Councils responsibility for "maintaining" rather than "managing" indigenous biodiversity.	Amend title Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when <del>managing</del> <b>maintaining</b> indigenous biodiversity - district and regional plans
<b>S147 Wellington Fish and Game Council</b>	S147.035	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported. At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords Regional Councils responsibility for "maintaining" rather than "managing" indigenous biodiversity.	amend subclause: (a) apply mātauranga Māori frameworks, and support mana whenua / tangata whenua to exercise their kaitiakitanga, in <del>managing</del> <b>maintaining</b> and monitoring indigenous biodiversity <b>within a wider framework of equal weighting given to community values around indigenous and valued introduced biodiversity;</b>
<b>S163 Wairarapa</b>	S163.060	Policy IE.1: Giving effect to	Oppose	Defer to full review of the RPS in 2024	That the amendments to Policy IE.1 be deleted Delete the FW icon

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Federated Farmers		mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans			
S167 Taranaki Whānui	S167.089	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	Support with stronger protections for taonga	Insert a new clause: <b>(d) protect ecosystems and habitats that contains characteristics of special spiritual, historical or cultural significance to mana whenua / tangata whenua</b>
S168 Rangitāne O Wairarapa Inc	S168.078	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing	Support in part	This policy is supported, specifically the acknowledgement of the requirement to partner with mana whenua/tangata whenua. The explanation of this policy should also acknowledge partnership with tangata whenua.	Retain policy as notified but amend the explanation as follows: <b>Explanation</b> Policy IE.1 directs regional and district plans <b>to partner with mana whenua/tangata whenua</b> to recognise and provide for Māori values for indigenous biodiversity, and for the role of mana whenua as kaitiaki in the region.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		indigenous biodiversity - district and regional plans			
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.036	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	<p>This policy is a pleasant improvement from the current framework that the RPS provides for. Clauses (a), (b), and (c) allows Mana Whenua to exercise their rights, and these clauses can be strengthened.</p> <p>District and regional plans can only provide a Mātauranga framework when iwi desires to share this framework as it applies to indigenous biodiversity. This clause to say: partner with iwi to apply a mātauranga Māori framework for the management and monitoring of indigenous biodiversity' would be better.</p>	<p>Amend clause (a) to read:  <b>(a) partner with iwi to apply a mātauranga Māori framework for the management and monitoring of indigenous biodiversity apply mātauranga Māori frameworks, and support mana whenua / tangata whenua to exercise their kaitiakitanga, in managing and monitoring indigenous biodiversity;</b></p>
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.037	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Support in part	<p>This policy is a pleasant improvement from the current framework that the RPS provides for. Clauses (a), (b), and (c) allows Mana Whenua to exercise their rights, and these clauses can be strengthened.</p> <p>Clause (b) should not say actively involve as Tangata Whenua holds the kaitiakitanga status; they will plan, decide, and monitor how indigenous biodiversity is tracking. Kaitiaki Monitoring Framework should be included here and be binding for District and Regional Plans. These Plans should spell out how the monitoring will be applied.</p>	<p>Clause (b) should not say actively involve as Tangata Whenua holds the kaitiakitanga status; they will plan, decide, and monitor how indigenous biodiversity is tracking. Kaitiaki Monitoring Framework should be included here and be binding for District and Regional Plans. These Plans should spell out how the monitoring will be applied.</p>
<b>S170 Te Rūnanga o</b>	S170.038	Policy IE.1: Giving	Support in part	<p>This policy is a pleasant improvement from the current framework that the RPS provides for. Clauses (a), (b),</p>	<p>Reword the policy to say Mana Whenua has access and use rights, and District and Regional Plans should acknowledge</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Toa Rangatira</b>		effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans		<p>and (c) allows Mana Whenua to exercise their rights, and these clauses can be strengthened.</p> <p>Clause (c) is not clear whether the (c) is allowing Mana Whenua to access and use indigenous biodiversity. This could be reworded to say Mana Whenua has access and use rights, and District and Regional Plans should acknowledge these rights and set up processes to ensure that their access and use are not limited and restricted in any way.</p>	these rights and set up processes to ensure that their access and use are not limited and restricted in any way.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.086	Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity - district and regional plans	Not Stated / Neutral	<p>Policy IE.3 Giving effect to mana whenua roles and values when managing indigenous biodiversity - consideration</p> <p>It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous biodiversity but not other parts of the Plan.</p>	Require mana whenua roles and values to be given consideration in consent applications. All taonga need to be linked to a kaitiaki monitoring framework
<b>S10 Transpower New Zealand Limited</b>	S10.003	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and	Support in part	Policy 29 would benefit from clarification of what is meant by a 'low', 'moderate', 'high' or 'extreme' hazard or risk. The use of "low to moderate" in (c) and "high to extreme" in (d) makes it unclear whether it means low or moderate or a separate category of 'low to moderate'. Policy 29 drafting indicates (d) only applies where both hazards and risks are high to extreme, so an activity could locate in a high hazard area if the risk was moderate. However, this also needs clarification.	Define the terms used in Policy 29 or provide the reader with guidance. For example, in the Explanation, on where definition of these terms can be found. Clarify the wording of Policy 29 in relation to hazards and risks and different hazard and risk levels or categories.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional plans			
<b>S11 Outdoor Bliss Heather Blissett</b>	S11.017	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Not stated.	Amend Policy 29(c) to read: "Include objectives, policies and rules to manage subdivision, use and development <del>in those areas where hazards and risks are assessed as low to moderate;</del>
<b>S16 Kāpiti Coast District Council</b>	S16.071	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	<p>The proposed shift in language from avoiding inappropriate subdivision, use and development to managing these activities is not consistent with the avoidance and mitigation requirements of sections 30 and 31 of the RMA. Council also opposes the proposed reference to high risk, as this would make the policy less consistent with section 6(h) of the RMA, which refers to the management of significant risks from natural hazards.</p> <p>Council also notes the use of the verb manage or managing within resource management policy gives little direction to decision makers on what is required. Council is not aware of any agreed meaning of this term in resource management practice or relevant case law.</p> <p>Council requests all verbs used in the RPS align with those required under the RMA or relevant higher-level statutory planning documents and are chosen for their clear meaning and direction for decision makers. In the case of regional, city and district council requirements under the RMA for the management of natural hazards, the verbs are avoid or mitigate, while under the NZCPS the verbs are avoid inappropriate (in the case of significant natural hazard risk).</p> <p>Council notes for parts of the proposed policy to be able to be implemented they rely on parts of the</p>	<p>Amend Policy 29 so it reads as follows: Policy 29: <b>Avoiding inappropriate</b> subdivision, use and development in areas at <del>high</del> <b>subject to significant risk</b> from natural hazards - district and regional plans.<i>[Note: Below comments do not form part of requested amendments to Policy 29]</i></p> <p>Replace all references to manage with appropriate verbs that provide clear direction to decision makers. Ensure the chosen verbs are consistent with requirements of the RMA and relevant higher-level statutory planning documents. Move the explanatory text so it forms part of the policy. Delete all remaining explanatory text following the transfer of relevant text into the policy.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>explanation, yet explanatory text has no legal status in a plan under the RMA. An example of this is policy clause (d) relying on all clauses in the explanation. We request this be addressed by including the explanatory text within the policy and deleting any reference to 'Explanation' from the policy entirely. We note that clearly drafted policies should require no explanatory text.</p>	
<b>S30 Porirua City Council</b>	S30.050	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	<p>Council supports taking a risk-based approach to natural hazard management, the Proposed Porirua District Plan takes this approach which is in line with national best practice.</p> <p>It is unclear what direction is sought in terms of the use of the term 'manage' in this context. Is it to ensure that there is no increased risk to people or properties?</p> <p>In regard to (b), amending the policy to require identification of low, medium or high hazards would be consistent with a risk-based approach to hazard management. The qualifier "at least" is requested as some hazards can have a return period of greater than 1:100 years but still be considered high, medium or low hazard risk such as fault lines.</p> <p>In regard to (d) it is unclear what would constitute an "extreme" risk and how it should be managed differently from a "high" risk. Council considers that the categorisation of low, medium or high risk is consistent with a best practice risk-based approach to natural hazard management.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>Regional and district plans shall <b>include objectives, policies, rules and / or other methods that:</b></p> <p>(a) identify areas affected by natural hazards; and</p> <p>(b) use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over <b>at least a 100 year planning horizon, which identifies the hazards as being low, medium or high;</b></p> <p>(c) <del>include objectives, policies and rules to manage</del> subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and</p> <p>(d) <del>include objectives, policies and rules to avoid</del> subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.</p>
<b>S32 Director-General of Conservation</b>	S32.020	Policy 29: Managing subdivision, use and development in areas at risk from	Support in part	<p>While the proposed changes are generally appropriate in most locations, they fail to give effect to NZCPS 2010 Policy 25, especially clauses a and b of that Policy which require avoiding increasing risk.</p>	<p>Amend the policy to give effect to the NZCPS, including by adding a new subclause as follows or words to like effect: <b>"include objectives, policies and rules to avoid subdivision, use or development within the coastal environment that would increase the risk of adverse effects from coastal hazards"</b></p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		natural hazards - district and regional plans			
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.049	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	<p>Council notes that section 6 of the RMA identifies the management of significant risks from natural hazards as a matter of national importance</p> <p>In this regard it would seem more appropriate to avoid inappropriate subdivision, use and development in areas of high to extreme risk, whilst managing development in areas assessed as having a low to moderate risk. It is also noted that under section 30 and 31 there is a direction for the avoidance or mitigation of natural hazards.</p> <p>The term 'managing' is a bit ambiguous and this policy should provide a strong message that inappropriate development should be avoided.</p> <p>It is unclear how an area of extreme, high, moderate or low risk is defined in this context.</p>	<p>Define extreme, high, moderate and low risk and amend policy to read:</p> <p>Policy 29: <b>Avoiding inappropriate Managing</b> subdivision, use and development in areas at risk from natural hazards - district and regional plans.</p>
<b>S49 Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand Trading Limited</b>	S49.003	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	<p>Policy 29 is supported in that it is entirely appropriate for regional and district plans to identify and map areas susceptible to natural hazards. Telecommunication companies rely on this identification to help understand the risk profile of their infrastructure, and influence decisions as to where new infrastructure should go, and how it should be designed to be resilient. However, there is no need for regional or district plans to regulate the resilience of telecommunications infrastructure where it is located in natural hazard areas. In some instances, avoiding a natural hazard area is not possible for technical and operational reasons. The telecommunication companies have obligations under the Civil Defence Emergency Management Act 2002 (CDEMA) to provide resilient infrastructure. This is regulated under the CDEMA, and adding another layer of regulation of resilience through regional and district plans is not necessary.</p>	<p>Remove the ability for regional and district plans to regulate the resilience of infrastructure to identified natural hazards.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>This is also recognised in Regulation 57 of the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 (NESTF). Regulation 57 of the NESTF is as follows, and clearly exempts regulated activities under the NESTF from having to comply with District Plan rules about natural hazards:</p> <p>57 District rules about natural hazard areas disappplied</p> <p>(1) A territorial authority cannot make a natural hazard rule that applies to a regulated activity .</p> <p>(2) A natural hazard rule that was made before these regulations came into force, does not apply in relation to a regulated activity.</p> <p>(3) In this regulation, natural hazard rule means a district rule that prescribes measures to mitigate the effect of natural hazards in an area identified in the district plan as being subject to 1 or more natural hazards.</p> <p>Section 6.11 of the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2016 Users' Guide, published by the Ministry for the Environment (August 2018) confirms the exemption of regulated telecommunications activities from having to comply with District Plan natural hazard rules, via the following statement:</p> <p>Regulation 57 makes it clear that natural hazard rules in district plans do not apply to a regulated activity under the NESTF. It also makes clear that territorial authorities cannot make natural hazard rules that apply to regulated activities under the NESTF. This is because resilience is already factored into industry practice, and they will either avoid hazard areas or engineer structures to be resilient to the hazard risk. Natural hazards encompass the full breath of hazards including flooding, instability, earthquake and climate change.</p> <p>Given this direction is provided at a national level, it would be appropriate for regional and district statutory planning documents to be consistent.</p> <p>It is entirely appropriate for district and regional plans to</p>	



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				regulate infrastructure in natural hazards whereby that regulation is to ensure that the development on infrastructure does not exacerbate the effect of the natural hazard on any other party.	
<b>S79 South Wairarapa District Council</b>	S79.036	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	The provisions are generally supported when examined alongside policies 51 and 52.	Retain as notified. Include additional methods to support consistent implementation of risk assessment and provision/communication of natural hazards and associated risks.
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.068	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Generally supports Policy 29 in the 'Natural Hazards' chapter.	Retain as notified.
<b>S113 Wellington Water</b>	S113.027	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Not all activities can avoid high risk areas. For example, anywhere wet is considered high risk under the pNRP but many Wellington Water activities need to occur in wet locations.	Amend clause (d) as follows: (d) include objectives, policies and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme <b>or to appropriately manage the risk for regionally significant infrastructure.</b>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S115 Hutt City Council</b>	S115.050	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Support the intent of this policy. As some hazards recur with a frequency of less than 1 in 100 years (such as fault ruptures) it should be clarified that it does not preclude consideration of hazards beyond this time period.	Retain the amendments to Policy 29, but with the following change to clause (b): "use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over <b>at least</b> a 100 year planning horizon;"
<b>S128 Horticulture New Zealand</b>	S128.036	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Support using a risk-based approach, this is valid both in determining natural hazard risk and in the management response - for example, a non-habitable farm buildings for example are less of a risk compared to new residential development. The direction of avoiding all subdivision, use or development in areas where hazards and risks are assessed as high to extreme may be too onerous in all circumstances.	Amend as follows:(d) include objectives, policies and rules to avoid subdivision, <b>or inappropriate</b> use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.
<b>S131 Ātiawa ki Whakarongotai Charitable Trust</b>	S131.074	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	While Ātiawa supports the overall intent of Policy 29, Ātiawa is concerned with details of the policy. In particular, (d), Ātiawa is concerned that Regional Council is determining how mana whenua can develop and use their land. Ātiawa acknowledges that it is important to avoid development in areas where risk is high to extreme; however any remnants of land held by Māori that trigger this subclause would be significantly limited. Ātiawa would like to work with Regional Council to determine which areas are affected by natural hazards (both low/tolerable and intolerable) to work together through any issues that capture land held by Ātiawa ki Whakarongotai uri.	Amend to: Regional and district plans shall: (a) <b>partner with mana whenua</b> to identify areas affected by natural hazards; and (b) use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over a 100 year planning horizon; (c) include objectives, policies and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (d) include objectives, policies and rules to avoid subdivision, use or development and hazard sensitive

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					activities where the hazards are assessed as high to extreme.
<b>S132 Toka Tu Ake EQC</b>	S132.007	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	We support minimizing the risk from natural hazards by avoiding new or further residential development in areas most at risk. Guidance should be provided to district and city councils on which situations constitute high risk from natural hazards.	Strengthen, change to: <b>"Avoid subdivision, use and development in areas at high risk from natural hazards and manage in areas of lower risk"</b> Add guidance on what constitutes low, medium, and high natural hazard risk, to avoid inconsistent application of these terms in district plans
<b>S133 Muaūpoko Tribal Authority</b>	S133.059	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
<b>S134 Powerco Limited</b>	S134.012	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	It will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme. For example, under the PNRP, all areas in the coastal marine area and the beds of lakes and rivers are considered high hazard risk areas. Under the Proposed Porirua District Plan, stream corridors and areas in the current coastal hazard inundation and erosion overlays are considered high risk. There is existing development in these areas, which will need to be maintained. Further, provision is made in both plans for certain new activities to occur in these locations. It is inappropriate to prevent any and all further development in high hazard areas. In the case of regionally significant	Amend Policy 29 to recognise that it will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme, and to ensure appropriate provision is made for regionally significant infrastructure to be maintained and to traverse such locations. This could be achieved by making following changes or to the same effect:  "Regional and district plans shall: (a) identify areas affected by natural hazards; and (b) use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impact over a 100 year planning horizon; (c) include objectives, policies and rules to manage subdivision,

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				<p>infrastructure networks, there will be a need for infrastructure to cross areas identified as high or extreme hazard, such as stream and river corridors, in order to deliver services to communities on the other side.</p>	<p>use and development in those areas where the hazards and risks are assessed as low to moderate; and (d) include objectives, policies and rules to avoid <b>new</b> subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme, <b>and to appropriately managerisk to new and existing regionally significant infrastructure and to existingsubdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.</b> ..."</p>
<p><b>S137 Greater Wellington Regional Council (GWRC)</b></p>	<p>S137.025</p>	<p>Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans</p>	<p>Support in part</p>	<p>Amendments are required to improve clarity and consistency, and to provide certainty that for the hazard provisions to be successful in district plans they need to be linked to hazard overlays.</p>	<p>Amend Clause (d) of Policy 29 as follows: ... (d) use a risk-based approach to assess the consequences to <b>new or existing</b> subdivision, use and development from natural hazard and climate change impacts over a 100 year planning horizon;</p>
<p><b>S137 Greater Wellington Regional Council (GWRC)</b></p>	<p>S137.026</p>	<p>Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans</p>	<p>Support in part</p>	<p>Amendments are required to improve clarity and consistency, and to provide certainty that for the hazard provisions to be successful in district plans they need to be linked to hazard overlays.</p>	<p>Amend Clause (e) and (f) in Policy 29 to read: (e) include <b>hazard overlays</b>, objectives, policies and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (f) include <b>hazard overlays</b>, objectives, policies and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S140 Wellington City Council (WCC)</b>	S140.051	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Support the intent of this policy. As some hazards recur with a frequency of less than 1 in 100 years (such as fault ruptures) it should be clarified that it does not preclude consideration of hazards beyond this time period.	Retain the amendments to Policy 29, but with the following change to clause (b): "use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over at least a 100 year planning horizon;"
<b>S144 Sustainable Wairarapa Inc</b>	S144.028	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	See Policy 57 regarding sprawl. Generally, containing new development will minimize exposure to natural hazards.	Retain as notified.
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.047	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose in part	Many infrastructure providers have a functional or operational requirement to locate in a certain area, even if that area is subject to natural hazard risk. Wellington Airport is located near the coast for example. Such infrastructure providers natural hazard tolerance is therefore inherently different to those without the same operational and functional need to locate in such areas.	Delete this policy or amend as follows: (d) include objectives, policies and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme, <b>unless there is a functional operational need locate in such areas</b>
<b>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</b>	S157.015	Policy 29: Managing subdivision, use and development in areas	Oppose	It will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme. For example, under the PNRP, all areas in the coastal marine area and the beds of lakes and rivers are considered high hazard risk areas. There is existing	Amend Policy 29 to recognise that it will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme, particularly where there is existing development or a need for infrastructure to locate in high hazard areas, such as stormwater outfalls to the coast or stream corridors. This could

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		at risk from natural hazards - district and regional plans		<p>development in these areas, for which provision needs to be made, at least, for its continued operation and maintenance. Of particular relevance are stormwater outfalls to the coast and stream corridors, and wharflines between port facilities in the CMA and bulk storage tanks, which traverse locations meeting the PNRP definition of 'high hazard risk areas'.</p> <p>Further, provision is made in both plans for certain new activities to occur in these locations. It is inappropriate to prevent any and all further development in high hazard areas. In the case of regionally significant infrastructure networks, there will be a need for infrastructure to cross areas identified as high or extreme hazard, such as stream and river corridors, in order to deliver services to communities on the other side.</p>	be achieved by making following changes or to the same effect: d) include objectives, policies and rules to avoid <b>inappropriate</b> subdivision, <del>use of</del> development and hazard sensitive activities where the hazards and risks are assessed as high to extreme,
<b>S158 Kāinga Ora Homes and Communities</b>	S158.025	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Supports the inclusion of a hazard and management hierarchy to manage the effects of hazards on subdivision, use and development.	Retain as notified.
<b>S163 Wairarapa Federated Farmers</b>	S163.061	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	<p>Defer to full review of the RPS in 2024</p> <p>This area was the subject of recent mediation in the pNRP hearings and the rationale for re-litigating in RPS Change One is not clear.</p>	That the amendments to Policy 29 be deleted

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<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.058	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	Oppose deletion of avoid as this is inconsistent with the NZCPS.	Retain "Avoid inappropriate" in the original policy to give effect to the NZCPS. Seek retention of original wording as the term 'manage' is not appropriate and fails to achieve NZCPS Objective 19.
<b>S166 Masterton District Council</b>	S166.031	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Support in principle but it has significant implications for development in the Masterton urban area (behind stop banks). The Wairarapa Combined District Plan will take a risk-based approach to hazard planning, as covered in the Wairarapa Combined District Plan review in the Natural Hazards Chapter (including GIS mapping, zones and appropriate overlays). But the extent of the policy is unclear, and questions remain. How are the objective and methods reconciled with the national direction for urban growth and intensification? What policies, rules and evidence will be necessary to avoid legal challenge?	Retain as notified.
<b>S167 Taranaki Whānui</b>	S167.090	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Support with strong partnership with mana whenua.  Taranaki Whānui is concerned that aspects of this policy will significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over our ancestral lands.  We understand the importance of avoiding risk and are keen to work in partnership with the regional council in determining areas that in particular fall under subclause (c) and any management thereof.	Retain as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.039	Policy 29: Managing subdivision, use and developme	Support in part	It is positive to see a stronger wording of Policy 29 and the intent of the policy is supported as the new wording provides. It is unclear of the Policy that specifies 'manage subdivision, use and development where the risks are low and tolerable'. The management of low	Retain as notified.

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		nt in areas at risk from natural hazards - district and regional plans		and tolerable risks suggests that we might deal with cumulative effects if development is allowed in such areas. It could also mean for those who interpret the Plans where these areas are not necessarily discouraged and that we have confidence the cumulative and unknown impacts can be managed. It is unclear in this policy what tools and management options we would have that would help managing the subdivision, use and development in those areas.	
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0143	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Rangitāne o Wairarapa support the 100-year planning horizon and risk-based approach proposed for the management of land development in areas at risk from natural hazards. Adopting this approach and using risk-based assessments as considerations in the decision-making process is also supported. We have whānau, hapū that are on the coastline that will be susceptible to hazards and will need management. There will need to be a tikanga and te ao Māori approach for how this happens as there are relationships to be established (Hapū moving into other Hapū whenua) as well as processes for relocating kōiwi (bones) or taonga.	Amend the policy to: Co-decide and engage with Tangata Whenua for these plans and support. Incorporate Mātauranga into the analysis.
<b>S11 Outdoor Bliss Heather Blissett</b>	S11.018	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support in part	Not stated.	Amend Explanation as follows: "...The centres identified are of significance to the region's form for <b>environmental wellbeing and indigenous biodiversity</b> , economic development, transport movement..."
<b>S16 Kāpiti Coast District Council</b>	S16.084	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally	Oppose	While Council supports enhancing the viability and vibrancy of all centres, the reasons for changes to the terminology in this policy are unclear.  In particular, Council notes that: • new terms such as "locally significant centres" do not appear to correlate with terms in the national planning	Delete the list of locally significant centres.



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		and locally significant centres - district plans		<p>standards</p> <ul style="list-style-type: none"> <li>• it is unclear why Ōtaki and Waikanae are included in a list of "locally significant centres" but not Raumati Beach and Paraparaumu Beach which are also classified as "town centres" in the Operative Kapiti Coast District Plan 2021</li> <li>• it is unclear whether Ōtaki is intended to mean the town centre known as Ōtaki Main Street, or the town centre known as Ōtaki Rail, or both.</li> <li>• in the absence of any justification to the contrary, it is inappropriate and unnecessary for the RPS to get to the level of detail specifying any particular centres as being "locally significant".</li> </ul>	
<b>S25 Carterton District Council</b>	S25.032	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support	CDC supports this policy and recognition of Carterton as a locally significant centre.	Retain this policy.
<b>S30 Porirua City Council</b>	S30.051	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Oppose	<p>This policy needs to align with national planning standard zones rather than introducing new terms. The RPS should give better guidance on how the NPS-UD should be implemented in a Wellington region context.</p> <p>The notified policy will result in a polycentric urban form rather than an urban form where intensification is located in areas which are best served by public transport and services.</p> <p>Wellington city centre is the primary centre in the Wellington region and is to continue to be the main focus for a wide range of commercial activity, community activities, cultural activities, visitor</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>Policy 30: <del>Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres</del> <b>Wellington regional form - commercial centres hierarchy- district plans</b> <b>District plans shall include objectives, policies, rules and/or other methods that identify and manage subdivision, use and development in the centres listed below in a way that recognises and maintains the viability and vibrancy of:1.</b></p>

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				<p>accommodation, as well as high density residential activity.</p> <p>The other key centres also provide significant business, retailing and community services, as well as residential opportunities. The requested amendments to this policy do not limit territorial authorities from identifying additional centres of local significance within their district plan.</p>	<p><b>The regionally significant Wellington city centre;2. The sub-regional metropolitan centres at:a. Upper Huttb. Lower Huttc. Porirua. Paraparumue. Masterton3. The locally significant town centres at:a. Petoneb. Kilbirniec. Johnsonville. Ōtaki. Waikanae. Featherston. Greytownh. Featherstoni. Cartertonj. Martinborough4. Other local and neighbourhood centres that provide for the daily and weekly needs of their residential catchments.ExplanationPolicy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region. These centres are of significance to achieving a well-functioning urban environment for Wellington and a compact regional form, including by ensuring that urban intensification occurs in a coherent and consistent manner across the region. By identifying these centres and in enabling their planned purpose and role in the urban environment and wider region, Policy 30 is intended to help achieve a regional form that deliver other outcomes identified in the RPS. This includes, reducing greenhouse gas emissions, ensuring an equitable access to commercial and community services, economic development, and land use-transport integration. They also support the economic, social and cultural well-being of communities.District Plans are required to identify these centres and include provisions that enable them to achieve their planned purpose and role. Maintaining and enhancing</b></p>

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					<p><b>the viability and vibrancy of these centres is important to encourage investment and development that supports an increased range and diversity of activities. It is also important for their prosperity and resilience in the face of social and economic change. Wellington city centre is the primary centre in the Wellington region and is to continue to be the main focus for a wide range commercial activity, community activities, cultural activities, visitor accommodation, as well as high density residential activity. The other key centres also provide significant business, retailing and community services, as well as residential opportunities. This policy does not limit territorial authorities from identifying additional centres of local significance within the district plan.</b></p>
<p><b>S31 Robert Anker</b></p>	<p>S31.021</p>	<p>Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans</p>	<p>Not Stated / Neutral</p>	<p>Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region. Policy 30 does not identify any hierarchy. This is unclear.</p>	<p>Amend the Explanation to read: Explanation Policy 30 identifies <del>the hierarchy of</del> regional and locally significant centres within the Wellington Region for.....</p>
<p><b>S34 Te Kaunihera o Te Awa</b></p>	<p>S34.090</p>	<p>Policy 30: Maintaining and</p>	<p>Support in part</p>	<p>Council supports the intent to support vitality and vibrancy of the range of centres in the region</p>	<p>Retain policy as notified.</p>

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Kairangi ki Uta, Upper Hutt City Council		enhancing the viability and vibrancy of regionally and locally significant centres - district plans			
S62 Philip Clegg	S62.020	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Not Stated / Neutral	Hierarchy is defined as a system in which people or things are put at various levels or ranks according to their importance. Policy 30 does not identify a hierarchy.	Amend as follows: Policy 30 identifies <del>the hierarchy of</del> regional and locally significant centres within the Wellington Region for which district plans must maintain and enhance...
S78 Beef + Lamb New Zealand Limited	S78.012	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Not Stated / Neutral	Accepts that the amendments to operative Policy 30 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
S96 Sarah (Dr) Kerkin	S96.016	Policy 30: Maintaining and enhancing the viability and	Not Stated / Neutral	Hierarchy is defined as a system in which people or things are put at various levels or ranks according to their importance. Policy 30 does not identify a hierarchy.	Amend as follows: Policy 30 identifies <del>the hierarchy of</del> regional and locally significant centres within the Wellington Region for which district plans must maintain and enhance...

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		vibrancy of regionally and locally significant centres - district plans			
S115 Hutt City Council	S115.051	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support in part	<p>We support removing references that could be construed as references to national planning standards zones. the current policy in the operative RPS also uses terms in a way that are inconsistent with the national planning standards.</p> <p>However, we do not support the concept of "locally significant centres". If centres are not of regional significance, then they should not be addressed by the Regional Policy Statement.</p> <p>The amendments also continue the unnecessary distinction of "sub-regional" and "suburban" centres in the operative RPS. While this distinction is made in the list of centres, the policy direction does not reflect this difference and does not accurately reflect differences in the size, scale, and role of centres.</p> <p>We request that all centres other than the Wellington City Centre be listed as "other regionally significant centres". District plans can then set out the hierarchy and role of centres a district. We support both the Lower Hutt city centre and the Petone commercial area continuing to be identified as having regional significance.</p>	<p>Amend Policy 30 as follows:            "Policy 30: Maintaining and enhancing the viability and vibrancy of regionally significant centres - district plans District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of:</p> <ol style="list-style-type: none"> <li>1. The <del>regionally significant central business district</del> <b>main centre of the region, the central business area of Wellington City;</b></li> <li>2. Other regionally significant centres:<b>(i) Lower Hutt;(ii) Petone;</b> [(iii) and other centres outside the City of Lower Hutt as appropriate]</li> <li>3. the locally significant centres of: [list of centres]</li> </ol> <p>Explanation            Policy 30 identifies the hierarchy of regionally <del>and locally</del> significant centres within the Wellington Region for which district plans must maintain and enhance their vibrancy and vitality. The centres identified are of significance to the region's form for economic development, transport movement, civic or community investment. Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. It is also important for their prosperity and resilience in the face of social and economic change. The <del>regional central business district</del> <b>area of Wellington City</b> is the <del>major centre</del> <b>the main centre</b> in the Wellington</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					region; the other key centres also provide significant <del>business, retailing</del> <b>commercial</b> and community services. This policy does not limit territorial authorities from identifying additional centres of local <b>or sub-regional</b> significance within the district plan." (Our submission is neutral on which centres outside the Hutt City Council area are included, other than the Wellington City centre)
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.075	Policy 30: Maintainin g and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support	Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided.  We also support a proactive approach to responding to climate change.	Retain as notified.
<b>S133 Muaūpoko Tribal Authority</b>	S133.068	Policy 30: Maintainin g and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support	Supports the strengthening of these policies to give effect to the NPSUD 2020.	Retain as notified.
<b>S140 Wellington</b>	S140.052	Policy 30: Maintainin	Support in part	Johnsonville and Kilbirnie should be considered 'other regionally significant centres' as it helps align with the	Amend policy as following: Policy 30: Maintaining and enhancing the viability and vibrancy

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City Council (WCC)		g and enhancing the viability and vibrancy of regionally and locally significant centres - district plans		<p>metropolitan centre zone application approach of the WCC PDP.</p> <p>It recognises that the role in growth, economic contribution, access to transport and range of services of Johnsonville and Kilbirnie is aligned with the regional centres, rather than the local centres they had been grouped with.</p>	<p>of regionally and locally significant centres - district plans District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of regional central business district in the Wellington city and the:</p> <ol style="list-style-type: none"> <li>1. the regionally significant central business district of Wellington City;</li> <li>2. other regionally significant centres: <ol style="list-style-type: none"> <li>(i) Upper Hutt city centre;</li> <li>(ii) Lower Hutt city centre;</li> <li>(iii) Porirua city centre;</li> <li>(iv) Paraparaumu town centre;</li> <li>(v) Masterton town centre; and the <b>(vi) Metropolitan centres of Johnsonville and Kilbirnie.</b></li> </ol> </li> <li>3. the locally significant (suburban) centres in: <ol style="list-style-type: none"> <li>(i) Petone; <del>(ii) Kilbirnie; and (iii) Johnsonville;</del></li> <li>(iv) Ōtaki;</li> <li>(v) Waikanae;</li> <li>(vi) Featherston;</li> <li>(vii) Greytown</li> <li>(viii) Carterton; and (ix) Martinborough...</li> </ol> </li> </ol>
S154 Investore Property Limited	S154.001	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Oppose in part	<p>Opposes the removal of Johnsonville from the definition of sub-regional centres and seeks Johnsonville Town Centre be recognised as a sub-regional centre.</p> <p>Under the Operative RPS, Johnsonville is currently appropriately recognised as both a suburban area of regional significance and a sub-regional centre. Johnsonville centre includes regionally and sub-regionally significant facilities and businesses. Johnsonville also has a number of significant community and recreational facilities that serve the sub-region.</p> <p>Consider the change will not give effect to the NPS-UD.</p>	Amend the RPS to include Johnsonville Town Centre as a sub-regional centre and any consequential changes to address the relief sought in the submission.
S154 Investore	S154.014	Policy 30: Maintaining and	Oppose in part	The proposed changes will not give effect the NPS-UD.	Amend Policy 30 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure

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Property Limited		enhancing the viability and vibrancy of regionally and locally significant centres - district plans			and create well-functioning and sustainable urban environments.
S155 Stride Investment Management Limited	S155.001	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Oppose in part	<p>Opposes the removal of Johnsonville from the definition of sub-regional centres and seeks Johnsonville Town Centre be recognised as a sub-regional centre.</p> <p>Under the Operative RPS, Johnsonville is currently appropriately recognised as both a suburban area of regional significance and a sub-regional centre. Johnsonville centre includes regionally and sub-regionally significant facilities and businesses. Johnsonville also has a number of significant community and recreational facilities that serve the sub-region.</p> <p>Consider the change will not give effect to the NPS-UD.</p>	Amend the RPS to include Johnsonville Town Centre as a sub-regional centre and any consequential changes to address the relief sought in the submission.
S155 Stride Investment Management Limited	S155.011	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Oppose in part	<p>The proposed changes will not give effect the NPS-UD.</p>	Amend Policy 30 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S158 Kāinga Ora Homes and	S158.026	Policy 30: Maintaining and enhancing the viability	Support in part	Seeks a regionally consistent approach in the hierarchy of centres and therefore seeks amendments to the policy to align with those submissions (of IPI Plan Changes) and the national planning standards.	Amend the policy as follows: District plans shall include policies, rules and/or methods that enable and manage a range of land use activities, <b>including high density residential living</b> that maintain and



Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Communities		and vibrancy of regionally and locally significant centres - district plans			<p>enhance the viability and vibrancy of:</p> <ol style="list-style-type: none"> <li>1. the regionally significant <del>central business district of Wellington City</del> <b>centre</b>;</li> <li>2. <del>other regionally significant centres</del> <b>The Metropolitan Centres of: (i) Johnsonville (ii) Kilbirnie</b> <ol style="list-style-type: none"> <li>(iii) Upper Hutt <b>Centre</b></li> <li>(iv) Lower Hutt <b>Centre (v) Petone</b></li> <li>(vi) Porirua</li> <li>(vii) Paraparaumu</li> <li>(viii) Masterton</li> </ol> </li> <li>3. The <b>Town Centres</b> <del>locally significant centres of: (i) Kilbirnie; (ii) Mirimar; (iii) Newtown; (iv) Tawa; (v) Petone; (vi) Naenae (vii) Waterloo (viii) Mana; (ix) Johnsonville</del> <ol style="list-style-type: none"> <li>(x) Ōtaki <b>(Township); (xi) Ōtaki (Main Road); (xii) Paraparaumu Beach; (xiii) Raumati Town</b></li> <li>(xiv) Waikanae; (xv) Featherston;</li> <li>(xvi) Greytown (xvii) Carterton; and</li> <li>(xviii) Martinborough</li> </ol> </li> </ol> <p>Explanation                      Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region <del>for which district plans must maintain and enhance their vibrancy and vitality.</del> The centres identified are of significance to the <b>Wellington</b> region's <b>to achieve a wellfunctioning urban environment and compact form that provides many employment opportunities, is well-serviced by public transport and has a high demand for housing and business activities for economic development, transport movement, civic or community investment.</b> Maintaining and enhancing</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. <b>Development and intensification of these areas will achieve a regional form that will contribute to meeting the objectives and policies of the RPS associated with climate change and land-use and transportation integration.</b> It is also important for their prosperity and resilience in the face of social and economic change. Wellington City centre <del>The regional central business district</del> is the major centre in the Wellington region; the other key centres also provide significant business, retailing and community services. This policy does not limit territorial authorities from identifying additional centres of local significance within the district plan</p>
<p><b>S166 Masterton District Council</b></p>	<p>S166.032</p>	<p>Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans</p>	<p>Support</p>	<p>This is being looked at in Wairarapa Combined District Plan review.</p>	<p>Retain as notified.</p>
<p><b>S167 Taranaki Whānui</b></p>	<p>S167.091</p>	<p>Policy 30: Maintaining and enhancing the viability and</p>	<p>Support</p>	<p>Taranaki Whānui supports the amendments to Policy 30.</p>	<p>Retain as notified.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		vibrancy of regionally and locally significant centres - district plans			
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0163	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support	Rangitāne o Wairarapa support the amendment of the policy to reflect the NPS-UD terminology.	Retain as notified.
<b>S16 Kāpiti Coast District Council</b>	S16.085	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	<p>The proposed policy is out of step with the NPS-UD and conflicts with the Intensification Planning Instrument (IPI) notified by Council.</p> <p>The policy wording attempts to interpret the requirements of the NPS-UD but appears to insert GWRC's understanding of heights and densities for medium and high density development via new requirements and unwarranted new definitions. This is neither necessary nor useful to city and district councils that have notified their Intensification Planning Instruments. Combined with the proposed new definitions for medium density residential development and high density development (which we also oppose), the result is a policy that interferes and conflicts with Council's IPI, and likely the IPIs of other Tier 1 city and district councils in the region.</p> <p>Also see our specific concerns regarding proposed defined terms in our submission below which are also relevant to Policy 31.</p>	<p>Either: Amend to ensure consistency with the wording of the NPS-UD and to ensure wording does not conflict with the Intensification Planning Instruments that have been notified by Tier 1 city and district councils. OR Delete Policy 31 entirely and work with the technical planning experts from Tier 1 city and district councils on appropriate policy wording to be notified as a variation to Proposed RPS Change 1.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S25 Carterton District Council</b>	S25.033	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	CDC supports this policy. The approach outlined in (c) is appropriate in the Carterton context and will be reflected in the draft Wairarapa Combined District Plan.	Retain this policy
<b>S30 Porirua City Council</b>	S30.052	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	The amendments to this policy just duplicate the requirements of the NPS-UD and do not add value in the context of the Wellington Region. It should be rewritten in line with relief sought in relation to Policy 30 to give regional guidance on the implementation of the NPS-UD.	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:  Policy 31: <del>Identifying and enabling a range of building heights and density</del> <b>Wellington regional form - urban intensification</b> - district plans <b>District plans shall include objectives, policies, rules and/or other methods that identify and enable urban intensification, including building heights and built form density, in a way that:</b> <b>1. For Wellington city centre: Realises as much development capacity as possible to maximise the benefits of intensification in this regionally significant centre;</b> <b>2. For Metropolitan centres identified in Policy 30: Reflect demand for housing and business activity in these locations, but at a minimum, building heights of at least 6 storeys;</b> <b>3. Within and adjacent to locally significant town centres identified in Policy 30 and other centres: Reflect the purpose of these centres and their planned level of commercial activities and community services; and</b> <b>4. Provide for building heights of at least 6 storeys in areas that are within a walkable catchment of the edge of the Wellington city centre, or the edge of a</b>

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

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		range of building heights and density - district plans		The RPS should also either include a definition of a rapid transit stop, or the policy should provide clear direction as to how a rapid transit stop is determined.	
<b>S31 Robert Anker</b>	S31.022	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	Policy 31 is an unnecessary inclusion that has the potential to cause confusion. NPS-UD clearly specifies how Local Authority District Plans are to be amended to give effect to the NPS and Policy 31 is attempting to insert another layer of bureaucracy in the process. As such Policy 31 adds nothing but the potential for confusion as to whether the Regional Policy Statement or the National Policy Statement prevails.	Delete Policy 31 from RPS
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.091	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	<p>Council considers this policy is unnecessary and may cause confusion, as clause (b) does not seem consistent with MDRS requirements.</p> <p>Council notes that the NPS-UD provides all the criteria necessary for adjustments to district plans as a matter of national direction and this is not required to be repeated, inaccurately, in the RPSPC1.</p>	Delete entirely or refer to 'enabling a range of building heights and density to give effect to the NPS' only without specific sub clause a) and b).
<b>S62 Philip Clegg</b>	S62.021	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	Policy 31 is an unnecessary inclusion that has the potential to cause confusion. The NPS-UD clearly specifies how Local Authority District Plans are to be amended to give effect to the NPS and Policy 31 just inserts another layer of bureaucracy in the process without really adding any value.	Delete Policy 31 from the RPS.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S78 Beef + Lamb New Zealand Limited</b>	S78.013	Policy 31: Identifying and enabling a range of building heights and density - district plans	Not Stated / Neutral	Accepts that the amendments to operative Policy 31 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
<b>S79 South Wairarapa District Council</b>	S79.037	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	Support the enabling of greater densities and height for transport oriented growth nodes in (c), including Featherston.	Retain (c) as notified.
<b>S89 VicLabour</b>	S89.006	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	Support Policy 31 mentioning the enabling of a range of building heights and density, but urge considering whether this language or structure in the policy will suffice in creating a good enough "dense housing" mandate. Notes that Policy 31(c) may cover this.	Amend Policy 31 to address the relief sought in the submission.
<b>S96 Sarah (Dr) Kerkin</b>	S96.017	Policy 31: Identifying and enabling a range of building heights and density -	Oppose	Policy 31 is an unnecessary inclusion that has the potential to cause confusion. The NPS-UD clearly specifies how Local Authority District Plans are to be amended to give effect to the NPS and Policy 31 just inserts another layer of bureaucracy in the process without really adding any value.	Delete Policy 31 from the RPS.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		district plans			
<b>S115 Hutt City Council</b>	S115.052	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose	The operative policy is redundant, and we support it being removed. However, the replacement policy simply repeats the direction of the National Policy Statement on Urban Development, without providing any additional direction or regional context.	Delete Policy 31 as proposed. Delete proposed replacement Policy 31.
<b>S124 KiwiRail Holdings Limited</b>	S124.006	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	<p>KiwiRail broadly supports Policy 31 as notified, but considers that further amendments are required to ensure consistency with the NPS-UD and the Resource Management (Enabling Housing Supply) Amendment Act 2021.</p> <p>Where urban development is enabled in new areas and at a higher density near lawfully established activities, like transport corridors, there is a need to ensure reverse sensitivity effects do not constrain the safe and efficient operation of transport networks. The Resource Management (Enabling Housing Supply) Amendment Act 2021 recognises a nuanced approach to urban development where a qualifying matter applies. Amendments are also necessary to recognise qualifying matters at the RPS level to ensure the district planning framework appropriately gives effect to the higher order planning documents.</p>	Amend the policy as. District plans shall include policies, rules and/or methods that identify and enable a range of different building heights and density within urban areas where it contributes to maintaining, establishing or improving the qualities and characteristics of well-functioning urban environments, <b>except where qualifying matters reduce building height and/or density of urban form</b> , including as a minimum:
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.076	Policy 31: Identifying and enabling a range of building	Support	Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved	Retain as notified.



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		heights and density - district plans		public transport hubs are provided.  We also support a proactive approach to responding to climate change.	
<b>S133 Muaūpoko Tribal Authority</b>	S133.069	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	Supports the strengthening of these policies to give effect to the NPSUD 2020.	Retain as notified.
<b>S137 Greater Wellington Regional Council (GWRC)</b>	S137.031	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section <b>Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.</b>
<b>S140 Wellington City Council (WCC)</b>	S140.053	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	Support provided that the definitions of 'high density development' and 'medium density residential development' are amended as outlined below in the definition. With the current definitions the policy is too prescriptive and does not meet the intent of the NPS-UD.	Retain as notified provided the definitions of 'high density development' and 'medium density residential development' are amended.
<b>S147 Wellington Fish and</b>	S147.060	Policy 31: Identifying and enabling a	Support	Necessary to give effect to the NPS-FM.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Game Council		range of building heights and density - district plans			
S154 Investore Property Limited	S154.008	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose in part	Considers the proposed amendment to Policy 31 is not sufficient to give effect to the NPS-UD.	Amend Policy 31 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S155 Stride Investment Management Limited	S155.006	Policy 31: Identifying and enabling a range of building heights and density - district plans	Oppose in part	Considers the proposed amendment to Policy 31 is not sufficient to give effect to the NPS-UD.	Amend Policy 31 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S158 Kāinga Ora Homes and Communities	S158.027	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	Seeks a regionally consistent approach in the hierarchy of centres and therefore seeks amendments to the policy to align with those submissions (of IPI Plan Changes) and the national planning standards. Also considers that the policy as notified does not add any additional value than what is stated within the NPS-UD and therefore seeks better direction for where high density development should occur and within prescribed minimum walkable catchments.	Amend Policy 31 as follows: District plans shall include policies, rules and/or methods that identify and enable a range of different building heights and <b>intensification density</b> within urban areas where it contributes to maintaining, establishing or improving the qualities and characteristics of well-functioning urban environments, including as a minimum: (a) For any tier 1 territorial authority, identify areas for high density development within: i. <b>As much capacity development capacity as possible to maximise the benefits of intensification within</b>

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p><b>the Wellington City Centre and at least a 15-20 minute / 1200m-1600m walkable catchment from the edge of the City Centre Zone;ii. Building heights of at least 6 storeys and density of urban form to reflect demand for housing and business use within the Metropolitan Zones and at least 10-15min/800m-1200m walkable catchment from the edge of the Metropolitan Centre Zone and from existing and planned rapid transit stops;iii. Within and adjacent to the town centres, building heights of at least 6 storeys and densities of urban form commensurate with the level of commercial activity and community services and at least a 5-10 min/400-800m walkable catchment from the edge of the Town Centre Zones.</b><del>(i) City centre zones and metropolitan centre zones; and(ii) any other locations, where there is with good access to:1. existing and planned rapid transit;2. edge of city centre zones and metropolitan centre zones; and/or3. areas with a range of commercial activities and community services.</del>(b) For any tier 1 territorial authority, identify areas for medium density residential development within any relevant residential zone. (c) For any other territorial authority not identified as a tier 1 territorial authority, identify areas for greater building height and density where: (i) there is good access to existing and planned</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<del>active and public transport to a range of commercial activities and community services; and/or (ii) there is relative demand for housing and business use in that location.</del>
<b>S166 Masterton District Council</b>	S166.033	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	This is being looked at in Wairarapa Combined District Plan review - areas for intensification being provided.	Retain as notified
<b>S167 Taranaki Whānui</b>	S167.092	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support in part	Taranaki Whānui understands the need for intensification. We want to ensure protection of mana whenua sites and areas of significance and are keen to work with council on this.	Retain as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.040	Policy 31: Identifying and enabling a range of building heights and density - district plans	Not Stated / Neutral	This policy does not mention the role of intensification and greenfield development interaction, and this may not recognise the land development trends and nuances that every city in the Greater Wellington region is going through. In Porirua, Porirua PDP Future Urban Zone (FUZ) suggested large areas of greenfield development including central government fast track greenfield development projects such as, the Plimmerton Farms. This means Porirua will gear up for quite a number of housing projects, supplied with greenfield development as well as giving effect to Government's NPS-UD requirements of intensification and densification.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>This policy is not clear where the intensification is expected to be covered by brownfield development and whether greenfield development is considered as part of intensification. This will have repercussions for the environment.</p> <p>It is unclear that Policy UD.1 Enabling intensification - district plans is kept separately as the policy intention could have been included in Policy 31.</p>	
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0164	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	Rangitāne o Wairarapa support expansion and amendment of the policy to reflect the NPS-UD provisions which relate to identifying areas for intensification and providing options for non-tier 1 Councils.	Retain as notified.
<b>S25 Carterton District Council</b>	S25.034	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	CDC supports the approach in this policy, of ensuring that industrial land is protected for industrial use. The draft Wairarapa Combined District Plan is consistent with this policy.	Retain this policy.
<b>S30 Porirua City Council</b>	S30.054	Policy 32: Identifying and protecting key industrial-based employment locations	Support in part	<p>Council generally supports this policy as industrial activities are an important part of our local economy and they can be compromised by inappropriate use, development and subdivision.</p> <p>Delete comma as it does not make sense grammatically.</p>	<p>Amend policy as follows: District plans should shall include policies, rules and/or methods that identify and protect key industrial-based employment locations where they contribute to the qualities and characteristics of well-functioning urban environments by:</p> <p>(a) Recognising the importance of industrial based activities and the employment opportunities they provide. (b) Identifying specific locations and applying zoning suitable for accommodating industrial activities and their reasonable needs and effects including supporting or ancillary activities.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		- district plans			(c) Identifying a range of land sizes and locations suitable for different industrial activities, and their operational needs including land-extensive activities, (d) Managing the establishment of non-industrial activities, in industrial zones, by avoiding activities likely to result in reverse sensitivity effects on industrial activities, or likely to result in an inefficient use of industrial zoned land or infrastructure.
<b>S31 Robert Anker</b>	S31.023	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Oppose	Policy 32 is regurgitating clear direction that is contained in NPS-UD and as such is redundant and should be removed.	Delete Policy 32 from the RPS
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.092	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support in part	It is beyond the legislative ability of GWRC to direct or require district plans to protect some types of industrial development. Council notes that this policy is quite directive given the use of 'shall; and 'protect' and questions the role of the RPS to direct this	Amend policy to delete sub clauses b) and d) and not amend 'should' to "shall".
<b>S62 Philip Clegg</b>	S62.022	Policy 32: Identifying and protecting key industrial-based	Oppose	Policy 32 repeats clear direction that is contained in NPS-UD. It is unnecessary and should be removed.	Delete Policy 32 from the RPS

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		employment locations - district plans			
<b>S78 Beef + Lamb New Zealand Limited</b>	S78.014	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Not Stated / Neutral	Accepts that the amendments to operative Policy 32 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
<b>S79 South Wairarapa District Council</b>	S79.038	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	There could be improved clarity for matters such as quarries being 'industrial' and critical for growth and therefore included as part of this policy.	Improve clarity over which activities is intended to be covered by the policy.
<b>S83 CentrePort Limited</b>	S83.004	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	There is a need for clear provision and protection of industrial employment locations such as port areas and freight distribution hubs.	Retain as notified
<b>S96 Sarah (Dr) Kerkin</b>	S96.018	Policy 32: Identifying and protecting key	Oppose	Policy 32 repeats clear direction that is contained in NPS-UD. It is unnecessary and should be removed.	Delete Policy 32 from the RPS

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		industrial-based employment locations - district plans			
<b>S115 Hutt City Council</b>	S115.053	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	No reasons given	Retain as notified
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.077	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	<p>Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided.</p> <p>We also support a proactive approach to responding to climate change.</p>	Retain as notified.
<b>S133 Muaūpoko Tribal Authority</b>	S133.070	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	Supports the strengthening of these policies to give effect to the NPSUD 2020.	Retain as notified.
<b>S137 Greater Wellington</b>	S137.032	Policy 32: Identifying and	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence	Add a sentence to the Explanation section <b>Well-functioning urban environments, as referred to</b>



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Regional Council (GWRC)</b>		protecting key industrial-based employment locations - district plans		to this effect in the relevant policy explanations will assist with clarity.	<b>in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.</b>
<b>S140 Wellington City Council (WCC)</b>	S140.054	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	Support as proposed.	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.061	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
<b>S158 Kāinga Ora Homes and Communities</b>	S158.028	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	Supports the amendments to Policy 32.	Retain as notified.

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<b>Submitter</b>	<b>Submission Point</b>	<b>Provision</b>	<b>Stance</b>	<b>Reasons</b>	<b>Decision Requested</b>
<b>S166 Masterton District Council</b>	S166.034	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	Zones being reviewed as part of Wairarapa Combined District Plan review.	Retain as notified.
<b>S167 Taranaki Whānui</b>	S167.093	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support in part	Taranaki Whānui want to ensure protection of mana whenua sites and areas of significance and are keen to work with council on this.	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0165	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	Support	Rangitāne o Wairarapa support the strengthening and expanding of the policy to require Council's to identify and protect key industrial-based employment locations.	Retain as notified.
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.039	Policy 33: Supporting well-functioning urban environments and a reduction in transport	Support in part	Integration between transport and land use is important to ensure that growth is supported by infrastructure. The RLTP is appropriate place for this to be.  Support insofar as it only relates to the RLTP and that it can be used to support advocacy for funding.	Retain provision as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		related greenhouse gas emissions - Regional Land Transport Plan			
<b>S115 Hutt City Council</b>	S115.054	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	Support as proposed	Retain as notified
<b>S129 Waka Kotahi NZ Transport Agency</b>	S129.015	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support in part	Supports well-functioning urban environments and the reduction of transport related greenhouse gas emissions.	Requests to be involved in the future drafting of Policy 33 to ensure the policy appropriately aligns with direction from Central Government.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S131 Ātiawa ki Whakaron gotai Charitable Trust</b>	S131.078	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	<p>Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided.</p> <p>We also support a proactive approach to responding to climate change.</p>	Retain as notified.
<b>S133 Muaūpoko Tribal Authority</b>	S133.071	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	Supports the strengthening of these policies to give effect to the NPSUD 2020.	Retain as notified.
<b>S137 Greater Wellington Regional Council (GWRC)</b>	S137.033	Policy 33: Supporting well-functioning urban environments and a reduction	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section <b>Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.</b>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		in transport related greenhouse gas emissions - Regional Land Transport Plan			
<b>S140 Wellington City Council (WCC)</b>	S140.055	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	Support as proposed.	Retain as notified.
<b>S147 Wellington Fish and Game Council</b>	S147.062	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land	Support	Necessary to give effect to the NPS-FM.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		Transport Plan			
<b>S154 Investore Property Limited</b>	S154.009	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Oppose in part	The proposed changes will not give effect the NPS-UD.	Amend Policy 33 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
<b>S155 Stride Investment Management Limited</b>	S155.007	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Oppose in part	The proposed changes will not give effect the NPS-UD.	Amend Policy 33 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
<b>S162 Winstone Aggregates</b>	S162.035	Policy 33: Supporting well-functioning urban environments	Not Stated / Neutral	Winstone supports the intent of this Policy in that it aims to provide well-functioning urban environments and a reduction in transport related greenhouse gases. Winstone consider that a clearer link be provided between this policy and Objective 30, so seek amendment to better recognise that the demand for	further amend Policy 33 and the accompanying explanation to provide for the benefits of use of local quarrying/local aggregate supply as an ingredient in well-functioning urban environments and reduction in transportation emissions in the Wellington Regional Land Transport Plan

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		nts and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan		mineral resources is met with the resources located in close proximity to the areas of demand. Quarrying aggregate that is located near the product use point reduces transport cost and emissions is a key factor in enabling development within the region.	
<b>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest &amp; Bird)</b>	S165.059	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support in part	There is a mismatch between what this policy seeks (a reduction of transport emissions) and Objective CC.3, which seeks a reduction of 35% of 2019 transport emissions by 2030)	Amend to ensure that the reduction sought under Policy 33 reflects the requirements of Objective CC.3.
<b>S166 Masterton District Council</b>	S166.035	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional	Not Stated / Neutral	No reason given for this submission point	Include District Plans which will allow for local infrastructure to support the Policy.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		Land Transport Plan			
<b>S167 Taranaki Whānui</b>	S167.094	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	Taranaki Whānui supports the amendments to Policy 33.	Retain as notified.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0166	Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions - Regional Land Transport Plan	Support	The direction that the Regional Land Transport Plan contain objectives and policies supporting well-functioning urban environments and a reduction in carbon emissions from transport is supported.	Retain as notified.
<b>S16 Kāpiti Coast District Council</b>	S16.079	Policy UD.1: Providing for the occupation	Support in part	The proposed policy supports the proposed papakāinga provisions included in the Council's IPI. An amendment is sought to qualify that in the case of tangata whenua only, they must demonstrate an ancestral connection to their land. This amendment	Amend policy UD.1 as follows: Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans District plans shall include objectives, policies, rules and/or



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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans		would make the policy consistent with the proposed papakāinga provisions notified by Council in its IPI that were developed in partnership with mana whenua. Council understands similar provisions have been notified in the IPIs of at least one other Tier 1 council in the region.	<p>methods that provide for the occupation, use, development and ongoing relationship of mana whenua with their <b>ancestral land, and tangata whenua where it can be demonstrated that there is a whakapapa or ancestral connection to the land and the land will remain in Māori ownership, and the land will remain in Māori ownership with their ancestral land,</b> by:</p> <p>(a) ...</p>
S30 Porirua City Council	S30.055	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Oppose	<p>Council supports this policy in principle, the Proposed Porirua District Plan seeks to enable papakāinga developments, introduces a Māori Purpose Zone for Hongoeka, and generally better enables the use and development of ancestral lands.</p> <p>There needs to be a definition in the RPS of what constitutes ancestral land, to provide clarity as to what land exactly this policy applies to considering how land owned by both mana whenua and maata waka should be treated.</p> <p>In regard to (a) if this clause is intended to apply to land that is not ancestral, then this clause does not flow from the chapeau of the policy. It needs to be another clause to this policy i.e.                      (a) ancestral land                      (b) general land owned by Māori</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>District plans shall include objectives, policies, rules and/or methods that provide for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land, by: <del>(a) enabling mana whenua / tangata whenua to exercise their Tino Rangatiratanga; and</del></p> <p>(b) recognising that marae and papakāinga are a Taonga and making appropriate provision for them; and                      (c) recognising the historical, contemporary, cultural, and social importance of papakāinga; and                      (d) if appropriate, identifying a Māori Purpose Zone; and                      (e) recognising Te Ao Māori and enabling mana whenua / tangata whenua to exercise Kaitiakitanga <b>and their Tino Rangatiratanga;</b> and                      (f) providing for the development of land owned by mana whenua / tangata whenua.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</b>	S34.093	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support	Support provisions that enable Māori to express their culture and traditions.	Retain as notified.
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.077	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support in part	Generally supports the regulatory policies in the 'Regional form, design and function' chapter. Provision UD.1(f) should provide for the development of land owned by Māori landowners, whether its whenua under General land or Māori Freehold land.	Amend Policy UD.1 clause (f) as follows: (f) providing for the development of land owned by mana whenua / tangata whenua <b>and Māori landowners.</b>
<b>S102 Te Tumu Paeroa   Office of</b>	S102.097	Policy UD.1: Providing for the	Support in part	Believes there is a need for the Regional Council to clarify who will identify a Māori Purpose Zone, if it is appropriate within the districts. Considers that it is	clarify who will identify a Māori Purpose Zone if deemed appropriate

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.1: Regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
the Māori Trustee		occupation , use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans		appropriate that iwi, hapū and Māori landowners identify a Māori Purpose Zone in their respective rohe.	
S115 Hutt City Council	S115.055	Policy UD.1: Providing for the occupation , use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support in part	While we support the general intent of this policy it is unclear which situations the policy is intended to apply to. At minimum the policy should set out whether it applies only to Māori freehold land, or whether any general land in Maori ownership is included, and which mana whenua groups should be covered.	Amend Policy UD.1 to clarify which situations the policy applies to.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.079	Policy UD.1: Providing for the occupation , use, development and	Support in part	Ātiawa position is that papakāinga should be provided for, not just recognised. Papakāinga are a taonga that enable tangata whenua to live on and be sustained by their ancestral land in accordance with tikanga Māori. Papakāinga development should enable Māori to live as Māori, and should support tangata whenua to thrive	Amend as follows: (c) <del>recognising</del> <b>providing for</b> the historical, contemporary, cultural, and social importance of papakāinga; and [Retain remainder of policy as drafted.]

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans		as a community. This includes the social, cultural and economic wellbeing of iwi, hapū and whānau.	
<b>S133 Muaūpoko Tribal Authority</b>	S133.072	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support in part	Supports these policies, however, requests amendment to ensure Muaūpoko is specifically recognised.	Specific recognition of Muaūpokoas having connection to Te-Whanganuia-Tara and interest in these policies.
<b>S140 Wellington City Council (WCC)</b>	S140.056	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua /	Support in part	While we support the general intent of this policy it is unclear which situations the policy is intended to apply to. At minimum the policy should set out whether it applies only to Māori freehold land, or whether any general land in Māori ownership is included, and which mana whenua groups should be covered.	Amend Policy UD.1 to clarify which situations the policy applies to.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		tangata whenua with their ancestral land - district plans			
<b>S167 Taranaki Whānui</b>	S167.095	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support	<p>Taranaki Whānui notes this is a new policy focussed on providing for the occupation, use, development, and ongoing relationship of mana whenua / tangata whenua with their ancestral land.</p> <p>Taranaki Whānui supports the policy to direct that district plans must provide for the occupation, use, development, and ongoing relationship of mana whenua / tangata whenua with their ancestral land and provides the minimum requirements in doing so.</p> <p>Enabling mana whenua / tangata whenua to exercise Tino Rangatiratanga may be achieved through District Councils working in partnership with mana whenua / tangata whenua during the plan review, change or variation process.</p> <p>Taranaki Whānui notes that Papakāinga is specifically referenced in the policy and are required to be provided for, which is consistent with Policy 1(a)(ii) of the National Policy Statement for Urban Development.</p> <p>Clause (d) provides the ability for identifying a Māori Purpose Zone, having the same meaning as the National Planning Standards. By way of background Taranaki Whānui has submitted on the Wellington City Council Proposed District Plan that is currently silent on Papakāinga definitions.</p>	Retain as notified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.087	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana	Not Stated / Neutral	<p>Policy UD.3 Marae and papakāinga - consideration</p> <p>The consideration of this policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi. Some of these lands that are returned to Tangata Whenua, iwi would have a raft of different values associated to the whenua and the values will be dynamic -can change over time. Urban Development provisions need to recognise these values and that recognise they will play out differently in different sites.</p>	<p>This policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi.</p> <p>Urban Development provisions need to recognise these values, that they can change over time and that recognise they will play out differently in different sites.</p> <p>Marae and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications.</p> <p>This may need to extend to other taonga and sites and areas</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		whenua / tangata whenua with their ancestral land - district plans		Marae and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications. This may need to extend to other taonga and sites and areas of significance, awa and moana and important places where iwi still practice cultural matāuranga.	of significance, awa and moana and important places where iwi still practice cultural matāuranga.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.0167	Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land - district plans	Support in part	Rangitāne o Wairarapa supports the inclusion of this broad overarching policy, in conjunction with a more specific policy containing matters for consideration. The requirement to acknowledge the importance of papakāinga and marae, use of Māori Purpose Zones, and providing for development of Māori owned land is supported. However, we request that an explicit reference to Mātauranga Māori is included in the policy.	Amend subclause (e) of the policy to include specific reference to "Mātauranga Māori":  (e) recognising Te Ao Māori <b>and Mātauranga Māori</b> , and enabling mana whenua / tangata whenua to exercise Kaitiakitanga;