

BEFORE THE FRESHWATER HEARING PANEL OF GREATER
WELLINGTON REGIONAL COUNCIL

IN THE MATTER OF the Resource Management Act 1991

AND

IN THE MATTER OF Proposed Plan Change 1 to the Regional Policy
Statement for the Wellington Region (Hearing Stream 3)

STATEMENT OF EVIDENCE BY CLAIRE HUNTER

14 AUGUST 2023

INTRODUCTION

QUALIFICATIONS AND EXPERIENCE

- 1 My full name is Claire Elizabeth Hunter. I am a resource management consultant and Director of Mitchell Daysh Limited, a nation-wide resource management and environmental planning consultancy firm. I have over 18 years' experience in this field. I hold a first-class Honours degree in Environmental Management from the University of Otago. I am a member of the Resource Management Law Association and an Associate Member of the New Zealand Planning Institute.
- 2 As I have appeared before the Panel on a previous occasion, I refer to my Appendix A of the Hearing Stream 2 Brief of Evidence which contained an outline of my professional experience. My firm has significant experience in the airport planning space, and my experience includes providing advice to both Queenstown Airport and Wellington Airport on both district and regional plan reviews, private plan changes, notices of requirements and resource consents.
- 3 I have assisted Wellington International Airport Limited (**WIAL**) with planning matters for more than a decade. I am therefore familiar with and have visited the Airport and the areas surrounding the Airport on numerous occasions.

CODE OF CONDUCT STATEMENT

- 4 While this is not an Environment Court hearing, I nonetheless confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I agree to comply with the Code and I am satisfied that the matters which I address in my evidence are within my field of expertise. I am not aware of any material facts that I have omitted which might alter or detract from the opinions I express in my evidence.

SCOPE OF EVIDENCE

- 5 This statement of evidence relates to Hearing Stream 3 (Climate Change) for proposed Plan Change 1 (**PC1**) to the Regional Policy Statement for the Wellington Region (**RPS**).

- 6 In preparing this statement of evidence I have reviewed the section 42A reports prepared on behalf of the Wellington Regional Council (**s42A**). I have also reviewed the technical evidence which has been prepared on behalf of the Council.
- 7 In this statement of evidence, I will provide my opinions on the recommendations expressed in the s42A report on those provisions within PC1 that has attracted a submission from WIAL . In particular I will focus on those provisions where I disagree with the recommendations made by the respective s42A report authors. The full suite of provisions relevant to this hearing stream and my preferred approach to these is also set out in **Appendix A**.

CLIMATE CHANGE – OVERVIEW OF WIAL'S SUBMISSION

- 8 In its submission WIAL recognised that the effects of climate change and global sustainability are of increasing importance to the community, WIAL's customers and the aviation industry.
- 9 WIAL works closely with government agencies to ensure that all relevant climate change related policy requirements are met and is closely engaged in the development of these . At a broader level WIAL submitted that the changes to the RPS promoted via PC1 need to appropriately recognise that there are already numerous layers of climate change regulation and that the Resource Management Act is not the only or primary legislative vehicle in which climate change is being addressed in New Zealand. New Zealand's response to climate change is primarily addressed through the Climate Change Response Act 2002 (**CCRA**).
- 10 The CCRA sets the overarching legal framework to drive domestic emissions reductions to enable New Zealand to meet its international climate change commitments, and to provide a means for identifying and adapting to the effects of climate change that pose a material level of risk to New Zealand now and in the future. Core action points for achieving climate reduction have been established within the Emissions Reduction Plan (**ERP**), which stems from the CCRA. The ERP will continually develop. These actions are comprehensive and stem from Central Government legislation. Replication or deviation from this centralised plan brings with it the risk of conflict, and

could lead to ambiguity and inefficiency- particularly for entities involved in the aviation industry, which operates across regional and international boundaries.

- 11 The Emissions Trading Scheme (**ETS**) was established through amendments to the CCRA effected in 2008 and is the current cornerstone of New Zealand's climate change regulatory response. More specifically, it is the primary mechanism for incentivising emission reductions, through the costs it imposes on emissions, as New Zealand seeks to transition to a lower carbon economy.
- 12 The ETS covers all sectors of the economy, including forestry, liquid fossil fuels used for transport (including domestic aviation emissions), 'stationary energy' (mainly covering oil and gas used in energy generation), industrial processes, waste, synthetic gases and agriculture. These sectors must report to the Government on their annual greenhouse gas emissions and, with the exception of agriculture, face costs for their emissions via ETS surrender obligations that are imposed on certain persons based on whether they carry out certain prescribed activities in each industry sector. The intended effect of the ETS is to drive behaviour across the economy away from emissions-intensive technologies and practices, toward 'cleaner' technologies and practices that result in lower (or no) emissions, as these become increasingly more economically viable alternatives.
- 13 The ERP highlights the importance of increasing the use of low carbon fuels for trains, ships, heavy trucks, and planes and commits the government to:
 - a. Setting a target and introducing policies so that at least 140 million litres of low carbon liquid fuels are sold in New Zealand by 31 December 2035;
 - b. Introducing low carbon fuel standards or mandates to increase demand for low carbon fuels, with specific consideration given to aviation;
 - c. Introducing incentives to establish low emissions fuel plants, such as biofuel, and make those fuels more competitive with traditional fossil fuels.
- 14 WIAL via its submission suggested that it needs flexibility in local government related legislation to adapt and incorporate new technologies into building design and airport/aviation related support infrastructure in

order to adapt to changes in the aviation industry and support airlines to reduce emissions. Different propulsion technologies (hydrogen, electric, fuel) and different aircraft (e.g. larger, more fuel-efficient aircraft models) have different infrastructure requirements and aircraft parking needs. WIAL needs to be able to plan and adapt to a range of futures depending on how the aviation industry develops.

- 15 WIAL also noted within its submission that a lot of attention has been given within the change to the RPS to reducing emissions, as distinct from adapting to climate change. For an airport, sitting in a bigger context of aviation emissions, there are relatively few emissions which the Airport can directly control. In contrast, there is a great deal of action that airports can take to address adaptation, giving their direct exposure to severe weather and where the Airport or its surrounding infrastructure are close to sea level. WIAL submitted that the RPS needs to include sufficient flexibility in the proposed climate change provision so that the Airport can appropriately adapt to the challenges and opportunities that the changing climate will present.
- 16 It is against this background which WIAL made submissions on the climate change provisions proposed as part of PC1.

GENERAL CLIMATE CHANGE PROVISIONS

ISSUE STATEMENT

- 17 The s42A report addressing the general provisions relating to climate change [107], agreed with WIAL (and other submitters) that there is relevant national legislation and policies that are central to addressing climate change. However, the writer suggests that references to this national backdrop are not needed in the introduction and issues section of the chapter and could detract from the focus of addressing climate change in Wellington region. The report notes however that alignment with this national climate change policy is referred to in the explanation of some of the climate change policies, and therefore considers that WIAL's submission has been addressed in part.
- 18 In my view reference to this national context is an important piece of scene setting for the RPS and PC1.
- 19 For some industries such as the aviation sector, it needs to be recognised at the outset that regional policy is not going to be the driving force of transformation in this space.

- 20 For example, He Pou a Rangī Climate Commission's view is that aviation is particularly challenging to decarbonise because there is currently no commercially viable sustainable aviation fuel (**SAF**) or fossil fuel alternatives for aviation in New Zealand. This is a reality that has to be recognised in developing regional policy.
- 21 The ERP also outlines the formation of a new public private partnership, known as Sustainable Aviation Aotearoa, to focus on decarbonising aviation within New Zealand. This is tasked with developing a net zero pathway for the sector including preparing for electric and green hydrogen powered aircraft and SAF supply.
- 22 The National Adaptation Plan (**NAP**) does not specifically deal with aviation, however it does address infrastructure (inclusive of airport infrastructure). The NAP observes that infrastructure is essential to providing for the needs of all New Zealanders and that the actions it contains will help ensure that such services remain resilient in the face of climate change. The NAP notes that many infrastructure assets (including Wellington Airport) are lifeline utilities under the Civil Defence Emergency Management Act 2002 and are required “to function to the fullest possible extent, even though this may be at a reduced level, during or after an emergency” (section 60(a)). Infrastructure providers are required under the NAP to understand and actively manage climate risk to its operations.
- 23 Developing provisions that are essentially blind to this national (or international) context, runs the risk of enshrining provisions into the RPS which ultimately gets out of step with national imperatives. These national imperatives are constantly evolving and adapting New Zealand’s response to climate change. I question whether regional policy making is sufficiently agile to keep pace.
- 24 In my view, the issue statement should be broadened to ensure that there is appropriate reference to the other legislation, the ERP and the NAP, for example, and that any approach adopted within the RPS is associative rather than in place of this national direction. More specifically, it is my view that emissions from the aviation sector should not be subject to the provisions within the RPS. This view is also consistent with the s42A reporting where it has been agreed that *“greenhouse gas emissions from aircraft flying, land and taking off should not be considered, as this would be inconsistent with Section 5R of the Climate Change Response Act 2002, which provides a deadline of 31 December 2023 for a decision on whether the 2050 target*

*should be amended to include emissions from international shipping and aviation, and if it is to be amended and how*¹.

- 25 This could be addressed in PC1 by clarifying the application of the RPS provisions to the aviation sector, and adding the following clause to the introductory / issues section:

For the avoidance of doubt, aviation activities are not subject to any of the following objectives, policies and methods. The Aviation sector is subject to regulations and agreements that will take precedence over any regional policy to ensure that a fair and coordinated response is achieved at both the national and international scale.

- 26 This would address the majority of WIAL's submissions points on the various PC1 provisions relating to this Hearing Stream. It would be an alternative relief to the more specific provisions, which I discuss further below, where WIAL sought exemption of aviation-related emissions where the proposed provisions may have directly or inadvertently captured such emissions.

OBJECTIVE CC.1

- 27 This objective seeks to support the Wellington region as a low emission and climate resilient region. WIAL generally supported the intent of this objective, however considered that sufficient flexibility needed to be built in to ensure infrastructure within the region is not only well planned in this context but is also functions well by recognising that sufficient flexibility is necessary to adapt in order to respond to the effects of climate change.
- 28 The s42A report writer agrees with WIAL and other submitters that the term "well planned" infrastructure is unclear and subjective. The report recommends that the submission of WIAL is accepted in part and that this is amended to refer to the "*planning and delivery of infrastructure*".²
- 29 I agree with the s42A report recommendations on this aspect. However, I note that the s42A report in response to other submitters has recommended removing the time component that is embedded within this objective, which I have some concerns with.
- 30 As notified the objective sought that "By 2050 the Wellington Region is a low emission and climate resilient region...". The objective now seeks that

¹ See paragraph 174 of the s42A report, Climate Change – Transportation for example (page 32)

² Paragraph 146 of the s42A report, Climate Change – General

the Wellington Region is a low emission and climate resilient region. While I support this as an outcome, I am concerned that without specifying a timeframe this objective implies achievement of the outcome with immediate effect. It also appears to go further than other RMA based legislation which seeks to acknowledge that there is a transitional period before this outcome can be fully achieved. For example, the National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023, as its primary objective seeks to reduce emissions of greenhouse gases by managing the discharges of air of greenhouse gases, from the production of industrial process heat... It does not set an immediate requirement to remove all greenhouse gas process heat emissions.

- 31 Given the above, and to suitably recognise that there will necessarily need to be a transitional phase - where activities reduce emissions as technology advances and become more technically and financially feasible; and where additional timeframes may allow increased investment to be set aside to enable assets within the Wellington region to become more resilient to the effects of climate change, I consider that the objective should be amended as follows:

The Wellington Region is able to sustainably transition to a low-emission and climate-resilient region...

- 32 I also note that Objective CC.1 was originally allocated to the Freshwater Planning Process (**FPP**). I disagree with this allocation for the reasons set out in Appendix A to the legal submissions presented at Hearing Stream 1. The s42A report agrees that this provision should not be subject to the FPP and should be subject to the standard Schedule 1 process³. I support this recommendation.

OBJECTIVE CC.3

- 33 This objective seeks to support the global goal of limiting warming to 1.5 degrees Celsius, and that net greenhouse gas emissions from transport, agriculture, stationary energy, waste and industry in the Wellington region contribute to reduce emissions to specified levels by 2030, and again in 2050 to achieve net zero emissions.
- 34 WIAL, alongside a number of submitters, questioned the extent to which the objective is achievable within the scope of an RMA document.

³ Paragraph 60 of the section 42A report – Climate Change General Provisions

- 35 I agree that it is unclear how this objective will be able to be achieved within context of the lower order regional and district plans which must give effect to this provision. It is also particularly unclear to me how an individual activity will demonstrate compliance with this objective via a consenting process and what might be expected of a project proponent to be able to demonstrate that a project is aligned with this objective.
- 36 In other words, it is not clear to me if all transport, agriculture, stationary energy, waste and industry activities will need to be able to demonstrate a 50% reduction in emissions by 2030; or whether this is a target that will be assessed on a region-wide scale with "overs and unders" still expected across various activities and industry groups. I am unclear how this provision will be applied to real world situations.
- 37 The s42A report has also not addressed WIAL's submission on how this RPS objective will be considered alongside national direction and other legislation. More specifically, it is not clear how the s42A report writer sees this objective fitting within the ERP framework. It is also relevant that for certain industries, such as international aviation and shipping, emissions from these activities are not currently included in the net-zero target but are separately dealt with as part of New Zealand's broader international commitments. As set out above the Commission is required under the CCRA to advise by the end of 2024 on whether these should be included in the net-zero target.⁴
- 38 The national climate change policy framework is complex and requires consideration of a number of present and future factors that will influence the path New Zealand takes to achieve the required level of emissions reductions to meet its ultimate net-zero emissions target, and five-yearly emissions budgets on the way to 2050. This means that the path is not expected to be linear, and there is uncertainty around the pace and extent of future technological developments that will be needed in each sector. Therefore, the policy steps taken to meet the 2050 net-zero target and associated emissions budgets must be sensitive to such uncertainties and weigh up what is achievable and economically viable in each period.
- 39 I therefore support the following drafting as set out in WIAL's submission⁵:

⁴ Climate Change Response Act, section 5R.

⁵ I note that this is the target for carbon emissions and biogenic have a different target.

To support New Zealand's pathway to net zero carbon emissions by 2050, align Wellington's regional responses to national legislation and expectations regarding emissions budgeting and outcomes.

OBJECTIVE CC.7

- 40 Objective CC.7 provides that people and businesses understand what climate change means for their future and are actively involved in planning and implementing appropriate mitigation and adaptation responses.
- 41 WIAL submitted in partial support of this provision, seeking an amendment to recognise that flexibility is necessary in providing an ability to adapt to the challenges and opportunities of climate change. Such flexibility is recognised in New Zealand's Climate Related Disclosure (**CRD**) regime which was introduced in 2021 to ensure that the effects of climate change are routinely considered in business and investment decisions. This will require many businesses, including Wellington Airport, to identify and disclose the impact physical and transitional climate change risks will have on their business and how they plan to adapt to those risks.
- 42 The s42A report writer recommends accepting this submission in part. However, the amendments do not go sufficiently far enough in my view. More particularly, this objective should properly recognise and provide for activities, such as infrastructure, which will play an essential role in building resilience to the effects of climate change and ensuring communities are able to respond to and adapt to the changing climate.
- 43 In my opinion, this objective should:
- a. Prioritise the development of new infrastructure that is appropriately planned, designed, built and operated to account for climate change over its lifetime;
 - b. Enable the retrofitting or redevelopment of existing infrastructure or enable it to be managed differently to address climate change; and
 - c. Provide for additional/ancillary infrastructure, such as sea walls, that may need to be constructed to address the physical impacts of climate change on key infrastructure assets.
- 44 Given this, I consider that the wording of this objective should read as follows:

People and businesses understand the current and future effects of climate change and how this may impact them and have an ability to implement ~~are actively involved in~~ appropriate climate change mitigation and climate change adaptation responses.

POLICY CC.8

- 45 As notified Policy CC.8 sought to prioritise the reduction of greenhouse gas emissions over offsetting. WIAL submitted that while it understood the intent of this Policy, it may not be the most appropriate outcome for all sectors, particularly the aviation industry, within which carbon offsetting (for international aviation⁶) is expected to lead to a net reduction in emissions directly. WIAL submitted that this Policy may be too simplistic in its approach because it prioritises the reduction of emissions over offsetting across all sectors and in all circumstances.
- 46 For example, in 2016 the Government agreed New Zealand would participate in ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (**CORSIA**).⁷ CORSIA is a global market-based measure for reducing and offsetting carbon emissions in the international aviation sector.⁸ The scheme is to remain in place until 2035 and will operate as a global carbon market. Participation is only voluntary between 2021 and 2026. The second phase from 2027 onward will require mandatory participation of most ICAO member states. When the scheme becomes mandatory, airlines must purchase carbon credits and finance abatement activities outside the aviation sector for emissions generated by international routes. I understand that Air New Zealand is already a participant of the scheme.
- 47 The s42A report writer recommends rejecting WIAL's submission on this Policy, noting that the evidence of Mr Roos highlights the importance of prioritising reducing gross GHG emissions over offsetting/net emissions and the risks and limitations of focusing on net emissions stating "*while achieving net-zero emissions may be necessary, it is critically important to minimise the reliance on removals/sequestration and maximise the reduction of gross emissions*".

⁶ <https://www.icao.int/environmental-protection/CORSIA/Pages/default.aspx>

⁷ Ministry of Transport "CORSIA" at <https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/>

⁸ Ministry of Transport "CORSIA" at <https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/>

48 The s42A report writer recommends redrafting of the provision, so that it reads as follows:

District and regional plans shall prioritise reducing greenhouse gas emissions by applying the following hierarchy in order:

- a) In the first instance, gross greenhouse gas emissions are avoided or reduced where practicable; and*
- b) Where gross greenhouse gas emissions cannot be avoided or reduced, a net reduction in greenhouse gas emissions is achieved where practicable with any offsetting undertaken as close to the source of the greenhouse gas emissions as possible; and*
- c) Increases in net greenhouse gas emissions are avoided to the extent practicable.*

49 My concerns with this Policy remain. The suggested approach is simply not reflective of the situation that confronts some industries, such as aviation, nor does it properly recognise the key initiatives that have been developed for these industries which are suitably nuanced to recognise the specific operating parameters that apply. This is somewhat surprising as in reporting on the Climate Change - Transportation provisions the report writer [174] "*agrees that greenhouse gas emissions from aircraft flying, land and taking off should not be considered, as this would be inconsistent with Section 5R of the Climate Change Response Act 2002, which provides a deadline of 31 December 2023 for a decision on whether the 2050 target should be amended to include emissions from international shipping and aviation, and if it is to be amended and how*".

50 Unfortunately, this has not been properly recognised by the report writer in recommending changes to many of the provisions within PC1 that have attracted a submission from WIAL. It remains unclear to me how the redrafted Policy CC.8 will impact the aviation sector and I have doubts that it properly recognises the broader policy imperatives that apply specifically to the aviation sector. As such, it is my view that Policy CC.8 should be deleted (unless the alternative relief set out in paragraph 25 above is accepted).

CLIMATE CHANGE – NATURE BASED SOLUTIONS

OBJECTIVE CC.4

- 51 Objective CC.4 recognises that nature-based solutions are integral to climate change mitigation and adaptation while improving the health and resilience of people, indigenous biodiversity and natural resources.
- 52 WIAL submitted in partial support of this objective, accepting that while nature-based solutions may well be part of the solution, they may not be practicable or appropriate in every circumstance and should not in all cases be preferred over more traditional responses (such as hard engineering solutions).
- 53 The s42A report writer acknowledges WIAL's submissions that nature-based solutions may not be practicable in all situations. However, it recommends rejecting WIAL's submission because the addition of "where practicable" as requested by WIAL will weaken the objective, leaving it open to conjecture and dispute and making it difficult to monitor its effectiveness. Furthermore, the report considers that the framing of the objective is such that it does not require every single development project to include a nature-based solution, rather, it encourages the consideration of the deployment of nature-based solutions alongside more traditional approaches to development.
- 54 While I agree with the thrust of this statement, it is my view that PC1 needs to make it very clear that resilient and well-functioning infrastructure is also critical to the region's ability to adapt to and manage the effects of climate change. This is consistent with WIAL's broader submission on PC1.
- 55 I now consider that a new objective should be inserted into PC1, aligning with the National Adaptation Plan, as set out below. This will appropriately balance the prioritisation of nature-based solutions, while also giving appropriate weight to ensuring infrastructure assets are resilient and protected to provide for the region's well-being.

Resilient infrastructure protects and enhances the well-being of the communities within the Wellington region.

POLICY CC.12 (CC.4, CC.4A, CC.14 and CC.14A)

- 56 Policy CC.12 seeks to protect, enhance and restore ecosystems that may provide nature-based solutions to climate change. The s42A report writer recommends deleting this provision on the basis that it is sufficiently

addressed via the amendments made to Policies CC.4, CC.4A, CC.14 and CC.14A. These amendments are discussed below.

- 57 The s42A report explains that amendments have been made to Policies CC.4 and CC.14 (with the addition of two new policies CC.4A and CC.14A), which seek to:
- a. Be more explicit about what activities are addressed by these policies, referring to development and infrastructure, rather than actions and initiatives to provide for climate resilient urban areas;
 - b. Clarifying the attributes of climate resilience that are to be provided for by development and infrastructure;
 - c. Clarifying the different responsibilities of territorial authorities and the regional council;
 - d. Clarifying climate resilience as regulatory or non regulatory;
 - e. Integrating the matters addressed by Policies CC.7 and CC.12 and deleting the as notified policies.
- 58 As discussed above, I agree that increasing climate resilience is critically important for infrastructure and the region's functioning. However, I do not consider that the drafting of these provisions is particularly helpful in this regard. The language selected for infrastructure related provisions appears to be “softer” (as it seeks to promote, as opposed to enable or provide for) and, therefore, promotes a situation where the providers of infrastructure will have less ability to ensure that these assets are sufficiently well protected from and capable of responding to the effects of climate change.
- 59 For example, Policy CC.4(d) *"requires that significant adverse effects on the climate resilience functions and values of an ecosystem shall be avoided".*
- 60 Whereas Policy CC.4(f) seeks to *"promote appropriate design of buildings and infrastructure, so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span".*
- 61 In my view protecting existing infrastructure assets and ensuring that they have sufficient flexibility to respond to the effects of climate change and/or increase their climate resilience is critical to the social, economic and cultural well-being of the region's communities. In my view, this needs to be

prioritised via an appropriate suite of provisions in PC1 (alongside the nature-based provisions) (refer to paragraph 55 above regarding a new objective, and further provisions recommended in Appendix A).

CLIMATE CHANGE – TRANSPORTATION

POLICY EIW.1

62 This Policy is specific to the Wellington Regional Land Transport Plan. WIAL submitted in partial support of this Policy, supporting the initiatives within the Transport Plan generally. WIAL was, however, concerned with the latter part of this Policy; as it infers that a district plan will determine whether an individual needs to access a private vehicle. WIAL also noted that the policy structure as drafted did not make grammatical sense.

63 The s42A report recommends rejecting WIAL's submission on this point, stating at paragraph 129 that the Policy's purpose is to promote alternative modes of transport, so people do not have to rely on private vehicles; it does not require that people give up their private vehicles.

64 I agree with the s42A report writer that the Policy seeks to promote alternative modes of transport, including access to public transport services with sufficient frequency and connectedness. I also agree that this may assist in reducing private vehicle use. However, other factors will contribute to an individual's decision-making around whether they would like to continue to "have access to a private vehicle" or not. I therefore agree with WIAL that this policy should be deleted, or amended as follows:

...accessible high quality active mode infrastructure and affordable public transport services with sufficient frequency and connectedness including between modes, to encourage a reduction in the dependency and use of private vehicles for everyday living. ~~for people to live in urban areas without the need to have access to a private vehicle.~~

POLICY CC.1

65 Policy CC.1 seeks that regional and district plans include objectives, policies and methods to require that all new and altered transport infrastructure is designed, constructed and operated in a way that will contribute to reducing greenhouse gas emissions. It seeks to achieve this 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 zero carbon modes.

66 The s42A report writer recommends significant amendments to this provision. In making these amendments, the report acknowledges WIAL's submission and agrees that this Policy should not apply to aviation activities. A note within the explanatory text has been proposed to clarify that Policy CC.1 does not apply to aircraft. In my opinion, this is appropriate.

67 However, the report writer considers that the Policy should apply to airports where resource consents or Notices of Requirement are being applied for in relation to land development. The report sets out that consideration needs to be given to how land development at the Airport supports a choice of transport to and from this location.

68 For certain land-based development or activities at or surrounding the Airport I do not disagree with this; however, as I have explained earlier in this evidence (refer to paragraphs 19 - 26 above) I do not agree that it would be appropriate for this Policy to apply to activities undertaken at the Airport which support aviation use (e.g. aircraft parking stands at the Airport). If the alternative relief set out in paragraph 25 is not accepted, then the explanatory text should be amended to note that this Policy does not apply to aircraft operations or activities which support aviation, as follows:

This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities.

POLICY CC.2

69 As notified, Policy CC.2 seeks that district plans shall include provisions requiring travel demand plans be submitted with resource consent applications to minimise reliance on private vehicles and maximise use of public transportation and active modes.

70 WIAL submitted in partial opposition to this Policy because it was concerned that it would inadvertently require the Airport to prepare individual travel demand plans for each development or new facility located at the Airport.

71 In response, the s42A report considers that this Policy would not apply to the Airport because most of its land is already designated under the District Plan (and this Policy only applies to resource consent applications). I agree

that this makes this Policy less applicable to the interests of WIAL, however there are still concerns as to how this policy would apply to activities such as rental car facilities and freight depots, for example, which are located within proximity to the Airport and may exceed the commercial threshold of 2,500m² (which are not necessarily owned and operated by WIAL). While such activities will need to manage greenhouse gas emissions (e.g., by increasing electrical vehicle fleets), it would be inappropriate for certain developments, such as a rental car facility, to prepare a *travel choice assessment*. Activities at the Airport should therefore be exempt from this policy (refer to Appendix A for this wording).

POLICY CC.9

72 Policy CC.9 seeks to support reductions in greenhouse gas emissions by having particular regard to whether a subdivision, use or development has been planned to optimise overall travel demand and maximise mode shift from private vehicles to public transport or active modes. Similar to the above submission points, WIAL sought that this provision did not specifically apply to the Airport and the aviation sector.

73 The s42A report writer concurs with this submission but considers it appropriate that the provision remains applicable to land-based development at the Airport. I am generally comfortable with this approach but consider that a note within the explanatory text, similar to that shown at paragraph 68 above (also refer to Appendix A), would be appropriate and for the same reasons, clarifying that the Policy does not apply to aircraft operations or activities which support aviation activities⁹.

CLIMATE CHANGE – ENERGY, WASTE AND INDUSTRY

POLICY 7 and POLICY 39

74 Policy 7 seeks to recognise the social, economic, cultural and environmental benefits of regionally significant infrastructure. WIAL supported this Policy but was concerned that the amendments proposed via PC1 would detract from the Policy's effectiveness through the use of vague terminology. The s42A report writer agrees that the term “low and zero carbon regionally significant infrastructure” is unclear. The proposed wording could be interpreted as creating a third tier of infrastructure, which is not the intent

⁹ If the alternative relief set out in paragraph 25 of this evidence is not accepted. In its absence the same exemption also needs to be added to Policy CC.10 and Policy CC.11.

and recommends that this clause be deleted. I agree that this is an appropriate outcome.

- 75 I am concerned however that the proposed addition of clause (c) which seeks to *recognise the benefits of regionally significant infrastructure to reduce greenhouse gas emissions*. In my view this continues to create some uncertainty. It is unclear to me how this would be assessed or what weight it would have in decision making. It also does not seem to assist, for example, in aiding the development of regionally significant infrastructure to transition to a new low carbon operating environment. For these reasons, I think it should be deleted.
- 76 Policy 39 is similar, and seeks that particular regard be given to the social, economic, cultural and environmental benefits of energy generated from renewable energy resources and regionally significant infrastructure in decision-making. WIAL supported the intent of this Policy but sought the removal of the clause which recognises these benefits *“particularly where it contributes to reducing greenhouse gas emissions”*.
- 77 The s42A report writer agrees with various submitters on the potential issues this drafting could create, and therefore recommends amendments to Policy 39. While I generally support the intention of these amendments, it would be my strong preference if policies were sufficiently enabling to support regionally significant infrastructure to transition to a low carbon economy, which would assist in being able to realise the overall reduction in greenhouse gas emissions. I, therefore, consider that clause b) to Policy 39 should read as follows:

b) recognise and provide for the social, economic, cultural and environmental benefits of other regionally significant infrastructure, and enable activities which support their ability to respond to the changing needs of the climate and/or contribute to reducing greenhouse gas emissions.

CLIMATE CHANGE – NATURAL HAZARDS

OBJECTIVE 19 and OBJECTIVE 20

- 78 Objective 19 seeks to minimise the risks and consequences to people, communities, businesses, property, infrastructure and the environment from natural hazards and climate change effects.

- 79 WIAL supported the intent of Objective 19 but requested that ‘minimise’ is defined as per the NRP. A similar request has been made with regard to Objective 20 and its use of “minimise”.
- 80 The s42A report writer agrees and recommends that the definition from this plan is included in the PC1 amendments. I agree that it is appropriate to ensure that there is consistency in the use of this term, and therefore support this recommendation.

OBJECTIVE 21 and OBJECTIVE CC.6

- 81 Objective 21 provides that the resilience of communities and the natural environment to the short, medium and long term effects of climate change and sea level rise is strengthened and people are better prepared for the consequences of natural hazard events. WIAL supported this but considered that the objective should be extended to ensure regionally significant infrastructure is similarly managed.
- 82 The s42A report writer recommends rejecting WIAL’s submission on the basis that “*resilience is a matter for infrastructure providers to address*”. And further at [para 194] that owing to the “*inclusion of infrastructure in Objectives 19 and CC.6 (discussed in section 3.12), and additional recognition in Policies 29 and 51 that regionally significant infrastructure cannot always be located outside of high hazard areas, sufficiently accommodates the issues of concern for infrastructure providers*”.
- 83 While I agree with the s42A report writer that infrastructure providers are responsible for ensuring their assets are resilient to the effects of climate change, they need to be suitably supported by a planning framework that enables sufficient flexibility to upgrade facilities and develop structural adaptation measures (e.g. building seawalls or using permeable paving surfaces to reduce runoff during heavy rainfall events). I am of the view that enabling infrastructure to operate effectively and efficiently, even within a changing climate, is necessary to provide for the community's well-being. Therefore, it is appropriate to recognise this as a component of a resilient community. When robust infrastructure services and networks are not available there are significant adverse impacts on wellbeing.
- 84 I also note that Objective CC.6 is similar to the drafting and intent of Objective 21. As notified Objective CC.6 reads:

Resource management and adaptation planning increase the resilience of communities and the natural environment to the short, medium and long term effects of climate change.

85 WIAL also sought infrastructure to be explicitly recognised in this objective. With regard to this particular submission point the s42A report writer at [para 210] agrees that the inclusion of infrastructure is appropriate for inclusion in Objective CC.6¹⁰, because increasing the resilience of infrastructure is an important component of adaptation planning and recommends a suitable amendment. This is appropriate.

86 For consistency, I am of the view that the reference to infrastructure should therefore be added to Objective 21 also, as follows:

The resilience of our communities, infrastructure and the natural environment is strengthened to the short, medium and long term effects of climate change and sea level rise, and people are better prepared for the consequences of natural hazard events.

POLICY 29 and POLICY 51

87 Policy 29 as notified requires that:

Avoiding-inappropriate Managing subdivision, use and development in areas at risk from natural hazards – district and regional plans.

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 impacts over a 100 year planning horizon;*
- (c) include objectives, polices and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and*
- (d) include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.*

88 I support the s42A report recommendations to amend clause (d) to appropriately recognise that there may be functional or operational needs to

¹⁰ “Resource management and adaptation planning increase the resilience of communities, infrastructure and the natural environment to the short, medium and long term effects of climate change”.

locate activities (particularly those associated with regionally significant infrastructure) in areas of high natural hazards.

- 89 Policy 51 is similar and seeks that when making decisions on resource consents, notices of requirement, or plan changes or variations, that the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised and sets out a number of further considerations that must be factored in determining whether an activity is inappropriate in such hazard areas.
- 90 The s42A report writer agrees with WIAL's submission on this Policy that it is necessary to acknowledge this within the policy framework, and recommends the following amendment to clause (g):

(g) avoiding ~~inappropriate~~ subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme; ~~in areas at high risk from natural hazards, unless there is a functional or operational need to be located in these areas;~~

- 91 I am supportive of this amendment.

POLICY 52

- 92 Policy 52 sets out the matters that decision makers must consider for hazard mitigation proposals. Among these is clause c) which requires the avoidance of structural protection works or hard engineering methods unless it is necessary to protect existing development, regionally significant infrastructure or property from unacceptable risk and the works form part of a long term hazard management strategy that represents the best practicable option for the future.
- 93 Clause (d) then requires that the long term viability of maintaining the structural protection works is considered, with particular to how climate change may increase the risk over time.
- 94 WIAL is in the early investigative phase of a seawall renewal project. This project has been necessitated by the fact that the existing seawall is nearing the end of its economic life, the increasing frequency and severity of storm events and the need to plan for rising sea levels.
- 95 WIAL submitted in partial support of Policy, citing potential issues arising from the application of this Policy on hazard mitigation projects such as the

seawall renewal. While I acknowledge that Policy 52 enables structural protection works and hard engineering methods where it is necessary to protect existing development and regionally significant infrastructure, some aspects of this Policy may still present some potentially significant consenting challenges for projects, such as the sea wall renewal.

- 96 In particular, I note that the exemption provided in clause c) for existing development and regionally significant infrastructure depends on having a long term hazard management strategy in place which has been agreed to by relevant authorities.
- 97 Wellington Airport, is located very close to the coast, and therefore is exposed to coastal hazards. Because of this WIAL is well versed in addressing the risks associated with natural hazards and is currently addressing this risk through a project to upgrade/replace its sea defence walls, which protect not only the Airport, but also Council infrastructure including Moa Point Road, the regional wastewater interceptor pipeline and water supply reticulation (Wellington Water). The existing coastal defence seawalls were established over 50 years ago, and although they have been subjected to various maintenance and upgrading, the latest engineering advice is that the area is subject to larger waves than originally anticipated in the design of the existing structures.
- 98 While these structures form part of a long term hazard management strategy for the Airport, I am unsure whether this would be sufficient for compliance with the requirements of clause c). I am also uncertain of what the “agreement” with relevant authorities represents in this context. In my view these statements within clause c) should be deleted, as they are only likely to continue to cause uncertainty. Clause c) should be amended as follows:

Avoiding structural protection works or hard engineering methods, except in areas where it is necessary to protect existing development, regionally significant infrastructure or property from unacceptable natural hazard risk. and the works form part of a long-term hazard management strategy agreed to by relevant authorities that represents the best practicable option for the future;

- 99 I am also unsure of the test required within clause (d), which refers to particular regard being had to the “long term viability of maintaining the structural protection works”. It is unclear whether this would relate to the costs of ongoing maintenance or whether it requires an assessment that the structural design is able to withstand (without unreasonable damage) the

likely impacts of increasing sea levels and climate change. However, it would also need to be recognised that often engineered structures have a life span, and maintenance and upgrading are likely necessary throughout this. Because of this uncertainty, I am of the view that clause (d) should be deleted.

- 100 Clause (g) does not make grammatical sense, and I am not convinced that it is necessary given the last paragraph of the policy which seeks to *minimise* adverse effects. I am of the view that it should be amended as follows:

(g) a no more than minor increase in risk to the effects on nearby areas as a result of changes in natural processes from the hazard mitigation works.

- 101 I also consider that the addition of the words “and do not increase” to the last paragraph of the policy before the explanation. This seems unnecessary given the definition¹¹ and application of the term “minimise”.

- 102 Finally, I note that this policy is classified as a FPP provision. In my view it does not satisfy the test as outlined in my Appendix A which was attached to WIAL’s legal submissions for Hearing Stream 1 and should be considered via the standard Schedule 1 process.

CONCLUSION

- 103 Wellington Airport is a strategic and important infrastructure asset for the Wellington region. It is therefore important as regionally and nationally significant infrastructure that it is sufficiently protected from the adverse effects of climate change. In achieving this the regulatory framework needs to enable WIAL sufficient flexibility to manage its operations, development and activities on the site to ensure they are suitably protected and resilient to the effects of climate change.

- 104 Another important aspect is ensuring that the Airport has sufficient flexibility in being able to adapt to and accommodate a changing aviation industry. As the industry transitions to a low emission technology, airports will need to be suitably geared with ‘on the ground’ infrastructure to support this. Again, the regional policy framework needs to suitably recognise this, and seek to avoid duplication or conflict with national direction on aviation related emissions. Any regional framework also needs to ensure that the Airport has

¹¹ as per s42A recommendation to include a definition

sufficient flexibility to be able to manage its site efficiently and without undue regulation, to successfully enable this transition.

105 I have attached to my evidence Appendix A which sets out WIAL's primary submissions on the Hearing Stream 3 provisions and the relief I am recommending after consideration of the s42A reports.

Claire Hunter

14 August 2023

APPENDIX A

PROVISION	POSITION	REASONS	RELIEF SOUGHT (subject to general relief sought in the covering submission)	S42A POSITION AND RECOMMENDED TEXT	CLAIRE HUNTER – RECOMMENDATIONS
Chapter 3.1A: Climate Change					
<p>Issue statement generally and including the following statements:</p> <p><u>The key areas of action required to address climate change are to:</u></p> <ol style="list-style-type: none"> <u>Reduce gross greenhouse gas emissions. This includes transitioning as rapidly as possible from fossil fuels to renewable energy and recognising that methane reductions offer a significant opportunity for global cooling in the short-term.....</u> <u>Take adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.</u> <p><u>The causes of climate change need to be addressed by internationally coordinated action, but our success depends on responses at national, local and individual levels.</u></p>	Support in part	<p>WIAL recognises that climate change is a significant issue for the Wellington region, New Zealand and the world. On this basis WIAL also seeks that the RPS sufficiently recognises that the RMA is not the primary regulatory tool for dealing with New Zealand’s climate change response. This is currently the Climate Change Response Act 2022 (CCRA). The CCRA sets the overarching legal framework to drive domestic emissions reductions to enable New Zealand to meet its international climate change commitments, and to provide a means for identifying and adapting to the effects of climate change that pose a material level of risk to New Zealand now and in the future.</p> <p>The RPS also needs to suitably recognise that the emission trading scheme (ETS) is the cornerstone of New Zealand’s climate change regulation. The ETS covers all sectors of the economy, including forestry, liquid fossil fuels used for transport, ‘stationary energy’ (mainly covering oil and gas used in energy generation), industrial processes, waste, synthetic gases and agriculture. These sectors must report to the Government on their annual greenhouse gas emissions</p>	<p>Amend the issue statement to ensure it is sufficiently sophisticated in recognising that there are many layers of regulation and law in New Zealand (and internationally) which will drive our overall response to climate change and achieving a zero-carbon economy.</p> <p>This includes ensuring there is appropriate reference to the CCRA, ETS and Zero Carbon Amendment Act within the RPS, and the approach taken has appropriate regard to, and is not inconsistent, with the requirements of this legislation including that this legislation does not require a total transition from fossil fuels to renewable energy and that the reduction over time should be what is reasonably practicable in the particular circumstances not what is “possible”. Otherwise, delete the Issue Statement.</p>	Accept in part. Refer to s42A report for general changes.	<p>Add the following text to the introduction section of the RPS:</p> <p><i><u>For the avoidance of doubt, aviation and shipping activities are not subject to any of the following objectives, policies and methods. These sectors are subject to regulations and agreements that will take precedence over any regional policy to ensure that a fair and coordinated response is achieved at both the national and international scale.</u></i></p> <p>Note that this is alternative relief and would address a number of WIAL’s specific submission points made below.</p>

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		<p>and, with the exception of agriculture, face costs for their emissions via ETS surrender obligations that are imposed on certain persons based on whether they carry out certain prescribed activities in each industry sector.</p> <p>While the ETS has been a ‘cap and trade’ scheme in name since its inception in 2008, the ‘cap’ aspect was only formally realised through amendments to the CCRA implemented through the Climate Change Response (Emissions Trading Reform) Amendment Act, effected in June 2020 (Emissions Trading Reform Amendment Act).</p> <p>The Emissions Trading Reform Amendment Act introduced a suite of reforms to align the ETS settings with the net-zero targets and associated five-yearly emissions budgets introduced through the Climate Change Response (Zero Carbon) Amendment Act introduced in November 2019 (Zero Carbon Amendment Act).</p> <p>The intended effect of the ETS is therefore to drive behaviour across the economy away from emissions-intensive technologies and practices, toward ‘cleaner’ technologies and practices that result in lower (or no)</p>			

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		emissions, as these become more economically viable alternatives.			
<p><u>Objective CC.1</u></p> <p><u>By 2050, the Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</u></p> <p>(a) <u>sustainable air, land, freshwater, and coastal management,</u></p> <p>(b) <u>well-functioning urban environments and rural areas, and</u></p> <p>(c) <u>well-planned infrastructure.</u></p>	Support in part	<p>WIAL generally supports the intent of this objective, however as noted above sufficient flexibility needs to be built into the RPS to ensure infrastructure is not only well planned but has sufficient flexibility to adapt and change its operations in order to respond to climate change.</p>	<p>Amend the objective, as follows (or to similar effect):</p> <p>By 2050, the Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</p> <p>(a) sustainable air, land, freshwater, and coastal management,</p> <p>(b) well-functioning urban environments and rural areas, and</p> <p>(c) well-planned and effectively operating infrastructure.</p>	<p>Amend:</p> <p>By 2050, t <u>The Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</u></p> <p>(a) <u>sustainable air, land, freshwater, and coastal management,</u></p> <p>(b) <u>well-functioning urban areas environments and rural areas, and</u></p> <p>(c) <u>the well-planning ed and delivery of infrastructure.</u></p>	<p>Amend as follows:</p> <p><u>The Wellington Region is able to sustainably transition to a low-emission and climate-resilient region...</u></p>
<p><u>Objective CC.3</u></p> <p><u>To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced:</u></p> <p>(a) <u>By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels, including a:</u></p> <p>(i) <u>35 percent reduction from 2018 levels in land transport-generated greenhouse gas emissions, and</u></p> <p>(ii) <u>40 percent increase in active travel and public transport</u></p>	Oppose in part	<p>WIAL understands the intent of this objective, however as noted above the RPS needs to adequately recognise that the RMA is not the only vehicle to achieve New Zealand net zero target.</p> <p>As discussed above, the Zero Carbon Amendments Act introduced a framework whereby Emission Reduction Plans are to set out the policies and strategies for meeting the relevant emission budgets. Each Emissions Reduction Plan will set the national policy framework for reducing emissions across the economy through sector-specific and multi-sector strategies.</p>	<p>Amend the objective, as follows (or to similar effect), or delete in its entirety:</p> <p><u>To support New Zealand’s pathway to net zero emissions by 2050, align Wellington’s regional responses to national legislation and expectations regarding emissions budgeting and outcomes.</u></p>	Minor amendments.	<p>Delete and replace with the following objective:</p> <p><u>To support New Zealand's pathway to net zero carbon emissions by 2050, align Wellington's regional responses to national legislation and expectations regarding emissions budgeting and outcomes.</u></p>

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<p><u>mode share from 2018 levels, and</u></p> <p>(iii) <u>60 percent reduction in public transport emissions, from 2018 levels, and</u></p> <p>(b) <u>By 2050, to achieve net-zero emissions.</u></p>		<p>It is noted that for certain industries such as international aviation and shipping, emissions from these activities are not currently included in the net-zero target, but are separately accounted for as part of New Zealand’s broader international commitments. The Commission is required under the CCRA to advise by the end of 2024 on whether these should be included in the net-zero target.¹²</p> <p>The national climate change policy framework is complex, and requires consideration of a number of present and future factors that will influence the path New Zealand takes to achieve the required level of emissions reductions to meet its ultimate net-zero emissions target, and five-yearly emissions budgets on the way to 2050. This means that the path is not expected to be linear, and there is uncertainty around the pace and extent of future technological developments that will be needed in each sector. The policy steps taken to meet the 2050 net-zero target and associated emissions budgets would need to be sensitive to such uncertainties, and weigh up what is achievable and economically viable in each period.</p>			

¹² Climate Change Response Act, section 5R.

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		<p>With regard to the aviation sector for example, the various difficulties recognised by the Commission and the Government in relation to decarbonising heavy transport suggest that it could take some time to overcome the various technological development and supply and cost barriers in order to achieve deeper emissions reductions in the aviation sector.</p> <p>WIAL also submits that airports provide a vital transport link in both business as usual and emergency settings (particularly in the NZ context), and it is important that the RPS provides sufficient flexibility to ensure that the Airport is able to successfully adapt to the effects of climate change in order to achieve long term sustainability of such regionally significant infrastructure.</p>			
<p><u>Objective CC.4</u></p> <p><u>Nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment.</u></p>	Oppose in part	<p>WIAL seeks that this objective suitably recognises that nature based responses are not always practicable within urban environments, and in some instances may present a direct conflict with the operational and safety of an infrastructure asset (e.g. by attracting birds to the airport surrounds).</p>	<p>Amend the objective as follows, or delete:</p> <p><u>Where practicable, nature based...</u></p>	<p>Amend as follows:</p> <p><i>Nature-based solutions are an integral part of climate change mitigation and climate change adaptation, improving the health and resilience of people, indigenous biodiversity, and the natural and physical resources environment.</i></p>	<p>Add a new objective (and policies such as those set out below) to sit alongside the provisions which prioritise nature based solutions to recognise the importance of protecting infrastructure and ensuring it is resilient to the effects of climate change. This is consistent with the NAP which recognises nature based solutions, but also seeks to ensure infrastructure is resilient from the adverse effects of climate change and is necessary to continue to operate effectively and efficiently in order to support the wellbeing of the community within the region. This would address WIAL's broader</p>

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					<p>submission points and resolve a number of the concerns relating to the 'nature based provisions'.</p> <p><i>Objective:</i></p> <p><i>Resilient infrastructure protects and enhances the well-being of the communities within the Wellington region.</i></p> <p><i>Policies:</i></p> <p><i>Reduce the vulnerability of assets exposed to climate change by understanding where infrastructure assets in the region are exposed and vulnerable to climate impacts, and prioritise the protection of assets, particularly those which provide for regionally significant infrastructure, so that services can continue to operate effectively and efficiently.</i></p> <p><i>Ensure that long term climate impacts are considered in the design and investment in infrastructure in the region.</i></p>
<p><u>Objective CC.6</u></p> <p><u>Resource management and adaptation planning increase the resilience of communities and the natural environment to the short, medium, and long-term effects of climate change.</u></p>	<p>Support in part</p>	<p>It is not only the resilience of communities and the natural environment that need strengthened resilience against the adverse effects of climate change. Infrastructure, including regionally significant infrastructure can be particularly vulnerable to climate change effects and represents a considerable financial investment that is critical to the resilience of communities. It warrants explicit mention in Objective CC.6.</p>	<p>Amend the objective as follows:</p> <p>Resource management and adaptation planning increase the resilience of communities, <u>infrastructure (including regionally significant infrastructure)</u> and the natural environment to the short, medium, and long-term effects of climate change.</p>	<p>Amend as follows:</p> <p><i>Resource management and adaptation planning increases the resilience of communities, <u>infrastructure</u> and the natural environment to the short, medium, and long-term effects of climate change.</i></p>	<p>Support s42A recommendations.</p>

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<p><u>Objective CC.7</u></p> <p><u>People and businesses understand what climate change means for their future and are actively involved in planning and implementing appropriate mitigation and adaptation responses.</u></p>	<p>Support in part</p>	<p>As above, WIAL submits that it is vital that the RPS adequately recognises that infrastructure in particular will need sufficient flexibility to adapt to the needs and effects of climate change. The community should be aware that this may result in changes to the current footprint or operation of such facilities. Switching to a new low emissions fuel or electrifying aircraft may mean that the airport is required to provide more space to accommodate smaller, more numerous aircraft or larger, more efficient aircraft, or require more space to install new technology for charging etc.</p>	<p>Amend the objective as follows:</p> <p>People and businesses understand what climate change means for their future, <u>and the changes that need to be made to adapt to the challenges and opportunities of climate change</u> and are actively involved in planning and implementing appropriate mitigation and adaptation responses.</p> <p>Or otherwise delete the objective.</p>	<p>Amend as follows:</p> <p><i>People and businesses understand what <u>the current and future effects of climate change and how this may impact them means for their future</u> and are actively involved in planning and implementing <u>appropriate climate change mitigation and climate change adaptation</u> responses.</i></p>	<p>Amend as follows:</p> <p><i>People and businesses understand the current and future effects of climate change and how this may impact them and have an ability to implement <u>are actively involved in appropriate climate change mitigation and climate change adaptation</u> responses.</i></p>
<p><u>Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure – district and regional plans</u></p> <p><u>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:</u></p> <p>(a) <u>Optimising overall transport demand;</u></p> <p>(b) <u>Maximising mode shift from private vehicles to public transport or active modes; and</u></p>	<p>Support in part</p>	<p>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.</p>	<p>Amend the policy to ensure it relates to land transportation infrastructure, rather than inadvertently capturing all modes of transportation.</p>	<p>Refer to s42A report for amendments.</p>	<p>Amend explanatory text, last sentence to read:</p> <p><i><u>This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities.</u></i></p> <p>Alternatively amend the introductory/issues section as set out above.</p>

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(c) <u>Supporting the move towards low and zero-carbon modes.</u>					
<p><u>Policy CC.2: Travel demand management plans – district plans</u></p> <p><u>By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions.</u></p>	Oppose in part	<p>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.</p>	Amend this policy to clarify and therefore ensure that this policy does not apply to development associated with Wellington International Airport.	Refer to s42A report for amendments.	<p>Add the following exemption to Table 1 of the regional thresholds as follows:</p> <p><i>Commercial Development of 2,500m² gross floor area*</i></p> <p><i>*This does not apply to developments at Wellington Airport, which are directly associated with passenger or freight movement or logistics (e.g. rental car facilities).</i></p> <p>And/or: amend the proposed definition (s42A report recommendation) of Travel Choice Assessment to exempt such activities which support people or freight movement to and from the Airport.</p>
<p><u>Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change – district and regional plans</u></p> <p><u>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.</u></p>	Oppose in part	<p>WIAL is concerned that this would promote development which would conflict with the effective and efficient operation of the airport, for example green spaces could attract birds which in turn for the airport present a significant safety hazard. It needs to be recognised that nature based solutions are not always practicable nor desirable in certain locations.</p>	<p>Amend the policy to add the following qualifier:</p> <p><i>...where it is practicable and appropriate to do so [or provide an appropriate qualifier for regionally significant infrastructure].</i></p> <p>Otherwise delete the Policy</p>	<p>Amend as follows:</p> <p><i>Work with and support landowners, mana whenua/tangata whenua, and other key stakeholders to protect, restore, or enhance ecosystems that provide nature-based solutions to climate change</i></p>	Support s42A report recommendations.

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<p><u>Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting – district and regional plans</u></p> <p><u>District and regional plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply.</u></p>	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).¹³ CORSIA is a global market-based measure for reducing and offsetting carbon emissions in the international aviation sector.¹⁴ The scheme is to remain in place until 2035 and will operate as a global carbon market. Participation is only voluntary between 2021 and 2026. The second phase from 2027 onward will require mandatory participation of most ICAO member states. When the scheme becomes mandatory, airlines will be required to purchase carbon credits and finance abatement activities outside the aviation sector for emissions generated by international routes.</p> <p>In August 2019, the Government reconfirmed the decision to participate in CORSIA from 2021, and agreed to implement it through the Civil Aviation Bill.¹⁵ The Bill is currently in its second reading stage</p>	Delete this policy.	Refer to s42A report for amendments.	Delete this policy for the reasons set out in evidence [paragraphs 45 – 50].

¹³ Ministry of Transport “CORSIA” at <https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/>

¹⁴ Ministry of Transport “CORSIA” at <https://www.transport.govt.nz/area-of-interest/environment-and-climate-change/corsia/>

¹⁵ The Explanatory Note for the Civil Aviation Bill states that the framework is intended to enable New Zealand to meet its obligations under CORSIA.

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		<p>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.¹⁶</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>			
<p><u>Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure – consideration</u></p> <p><u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and development have been planned to optimise overall transport demand, maximising mode shift from private vehicles to public transport or active modes, in a way that contributes to reducing greenhouse gas emissions.</u></p>	Oppose in part	<p>As set out above it may take some time to develop the strategies that are necessary to address emissions in the airport and aviation sector. It would therefore be inappropriate if this policy were to extend to air transportation.</p>	Amend this policy so that it is clear that it does not apply to the airport and aviation industry, or delete.	<p>Amend as follows:</p> <p><i>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and development have been planned in a way that contributes to reducing greenhouse gas emissions by to optimise optimising overall transport demand by giving effect to the hierarchical approach in order of priority within Policy CC.1 (a)-(c), maximising mode shift from private vehicles to public transport or active modes, and supporting the move towards low and zero-carbon modes in a way that</i></p>	<p>Amend explanatory text, last sentence to read:</p> <p><i>This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities.</i></p> <p>Alternatively amend the introductory/issues section as set out above.</p>

¹⁶ The monitoring and reporting requirements are provided under Part 6, Subpart 3 of the Civil Aviation Bill.

PROVISION	POSITION	REASONS	RELIEF SOUGHT (subject to general relief sought in the covering submission)	S42A POSITION AND RECOMMENDED TEXT	CLAIRE HUNTER – RECOMMENDATIONS
				<i>contributes to reducing greenhouse gas emissions.</i>	
<p><u>Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions – consideration</u></p> <p><u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan for freight distribution centres and new industrial areas or similar activities with significant freight servicing requirements, particular regard shall be given to the proximity of efficient transport networks and locations that will contribute to efficient freight movements and minimising associated greenhouse gas emissions.</u></p>	Oppose in part	WIAL submits that the intention of this policy is somewhat unclear. The Airport is a major distributor of freight for the region and it is not clear how this policy would impact on its operations in this regard.	Amend this policy so that it is clear that it does not apply to the airport and aviation industry, or delete.	Retain as notified.	<p>Amend explanatory text, last sentence to read:</p> <p><i><u>This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities.</u></i></p> <p>Alternatively amend the introductory/issues section as set out above.</p>
<p><u>Policy CC.11: Encouraging whole of life carbon emissions assessment – consideration</u></p> <p><u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, a whole of life carbon emissions assessment is encouraged for all new or altered transport infrastructure as part of the information submitted with the application. This information will assist with evaluating the potential greenhouse gas emissions, options for reducing direct and indirect greenhouse gas emissions and whether the infrastructure has been designed and will operate in a manner</u></p>	Oppose in part	As set out above technological changes and advances are evolving in the aviation sector to address emissions and it is difficult to prepare a “whole of life carbon emission assessment” which will be fixed at a certain point in time. The industry needs sufficient flexibility to adapt to new technology and respond to climate change. It would be inappropriate for this policy to require Wellington Airport and its operators to prepare a whole of life carbon emission assessment when technology and the industry is rapidly changing. In addition, this type of assessment is not appropriate for notices of	Delete this policy or make it clear that it does not apply to Wellington International Airport and aviation industry.	Amend explanation as follows: <i><u>This policy does not apply to aircraft.</u></i>	<p>Amend explanatory text, last sentence to read:</p> <p><i><u>This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities.</u></i></p> <p>Alternatively amend the introductory/issues section as set out above.</p>

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<p><u>that contributes to the regional target for a reduction to transport-related greenhouse gas emissions.</u></p>		<p>requirements where long term development is contemplated and details of specific projects are not yet known.</p>			
<p><u>Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change – consideration</u></p> <p><u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may adversely affect a nature-based solution to climate change and particular regard shall be given to avoiding adverse effects on the climate change mitigation or adaptation functions.</u></p>	<p>Oppose</p>	<p>WIAL is concerned that it is not sufficiently clear as to what a nature based solution to climate change involves. It would be inappropriate for this policy to unduly constrain regionally significant infrastructure and its associated development due to such uncertainty.</p>	<p>Delete this policy.</p>	<p>Delete this policy.</p>	<p>Support s42A report recommendation to delete.</p>
<p><u>Policy CC.14: Climate resilient urban areas – consideration</u></p> <p><u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, provide for actions and initiatives, particularly the use of nature-based solutions, that contribute to climate resilient urban areas, including:</u></p> <p>(a) <u>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</u></p>	<p>Oppose in part</p>	<p>WIAL is concerned that the drafting of this policy would require all of these matters to be achieved when considering development within urban areas by the use of the “and” between “e” and “f”. In some urban environments achieving all of these outcomes would be impractical, for example buildings within the airport could be used more efficiently to conserve water and energy usage, however it would be inappropriate for the airport to create green spaces, as these would present an aviation hazard and safety issue.</p>	<p>Delete this policy, or ensure that it does not apply to the Airport area.</p>	<p>Refer to s42A report for amendments.</p>	<p>Re-focus these provisions so infrastructure is also sufficiently protected and resilient from the effects of climate change (refer to proposed provisions above – Objective CC.4). While nature based solutions, including those incorporated into infrastructure and development (where appropriate) can be part of the solution, they are not the only matter which should be considered. Ensuring infrastructure can adapt and is protected in the long term from the adverse effects of climate change is critical to the effective functioning and wellbeing of the region.</p> <p>This would address WIAL’s broader submission points relating to climate resilience and adaptation.</p>

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<p><u>2030, and 30 percent cover by 2050,</u></p> <p>(b) <u>the application of water sensitive urban design principles to integrate natural water systems into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality,</u></p> <p>(c) <u>capturing, storing, and recycling water at a community-scale (for example, by requiring rain tanks, and setting targets for urban roof area rainwater collection),</u></p> <p>(d) <u>protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural hazards and the effects of climate change,</u></p> <p>(e) <u>providing for efficient use of water and energy in buildings and infrastructure, and</u></p> <p>(f) <u>buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.</u></p>					
Proposed Amendment to Chapter 3.3: Energy, Infrastructure and Waste					
<p>Policy 7: Recognising 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 recognise:</p>	<p>Oppose in part</p>	<p>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</p>	<p>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 .</p>	<p>Refer to s42A report for amendments.</p>	<p>Delete the proposed clause c) of this policy (s42A report version).</p>

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<p>(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, <u>and in particular low and zero carbon regionally significant infrastructure</u> including:</p> <ul style="list-style-type: none"> (i) people and goods can travel to, from and around the region efficiently and safely <u>and in ways that support transitioning to low or zero carbon multi modal travel modes;</u> (ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services; (iii) people have access to energy, <u>and preferably low or zero carbon energy</u>, so as to meet their needs; and (iv) people have access to telecommunication services. <p>(b) the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</p> <ul style="list-style-type: none"> (i) security of supply and diversification of our energy sources; 		<p>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.</p>			

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(ii) reducing dependency on imported energy resources; and (iii) reducing greenhouse gas emissions.					
<p>Policy 9: <u>Promoting greenhouse gas emission reduction and uptake of low emission fuels</u> – Regional Land Transport Plan Strategy Reducing the use and consumption of non-renewable transport fuels, and carbon dioxide emissions from transportation</p> <p>The Wellington Regional Land Transport Plan Strategy shall include objectives and policies that promote a reduction in:</p> <p>(a) <u>a reduction of the consumption of non-renewable transport fuels; and</u></p> <p>(b) the emission of carbon dioxide from transportation</p> <p>(b) <u>a reduction of the emission of greenhouse gases, and other transport-generated harmful emissions such as nitrogen dioxide; and</u></p> <p>(c) <u>the uptake of low emission or zero carbon fuels, biofuels and new technologies.</u></p> <p>including through prioritising public and active transport investment to serve future urban areas, to enable development in a sequential manner which minimises the risk of increasing car journeys in the region.</p>	Support	<p>WIAL supports this policy on the basis that it is directed at land transportation requirements. WIAL also notes that it will take some time to transition to Sustainable Aviation Fuels. This was recognised in the Government’s proposal to introduce a sustainable biofuels mandate. It is currently proposed that this mandate would not include sustainable aviation fuels. This is to be addressed separately as it is recognised that there are currently technological barriers in decarbonising the aviation industry. As such, there is more uncertainty as the policy direction the Government will take in the aviation sector across future emission budgets. It would be inappropriate for the RPS to be inconsistent with this national level policy.</p>	Ensure that this policy retains its focus on land transportation.	Refer to s42A report.	<p>Amend explanatory text, last sentence to read:</p> <p><i><u>This policy does not apply to aircraft, or activities undertaken at Wellington Airport which support aircraft activities.</u></i></p> <p>Alternatively amend the introductory/issues section as set out above.</p>

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<p>Policy 11: Promoting <u>and enabling</u> energy efficient design and small scale renewable energy generation – district plans</p> <p>District plans shall include policies and/or rules and other methods that:</p> <p>(a) promote energy efficient design and <u>the energy efficient alterations to existing buildings;</u></p> <p>(b) <u>enable the installation and use of</u> domestic scale (up to 20 kW) and small scale distributed renewable energy generation (up to 100 kW); <u>and provide for energy efficient alterations to existing buildings;</u></p>	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.	Refer to s42A report for amendments.	Support retention of this policy.
<p><u>Policy EIW.1: Promoting affordable high quality active mode and public transport services – Regional Land Transport Plan</u></p> <p><u>The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle, by contributing to reducing greenhouse emissions.</u></p>	Support in part	<p>WIAL supports initiatives to be contained within the Regional Land Transport Plan to assist in facilitating high quality active mode infrastructure and affordable public transport services with sufficient frequency. WIAL is however concerned that it may be unrealistic as an outcome within the RPS to expect that people will be able to live without the need to have access to a private vehicle.</p> <p>WIAL also submits that the current structure of the policy does not make grammatical sense and the last part should be deleted.</p>	<p>Delete the expectation that people will live without the need to access a private vehicle.</p> <p>Amend as follows:</p> <p><u>The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle, by contributing to reducing greenhouse emissions.</u></p>	<p>Amend as follows:</p> <p><i>The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle., by contributing to reducing greenhouse emissions.</i></p>	<p>Amend policy as follows:</p> <p><i>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, to encourage a reduction in the dependency and use of private vehicles for everyday living. for people to live in urban areas without the need to have access to a private vehicle.</i></p>

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<p>Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration</p> <p>When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:</p> <p>(a) the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, <u>in particular where it contributes to reducing greenhouse gas emissions</u>; and</p> <p>(b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and</p> <p>(c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and</p> <p>(d) significant wind, <u>solar</u> and marine renewable energy resources within the region.</p>	<p>Oppose in part</p>	<p>WIAL supports the policy in so far as it seeks to recognise the social, economic, cultural and environmental benefits of regionally significant infrastructure. However, the addition of “in particular low and zero carbon regionally significant infrastructure” is vague and it appears to elevate or prioritise this type of infrastructure over all other types of regionally significant infrastructure. This would be inappropriate and as discussed above it is critically important that the RPS protects existing regionally significant infrastructure from the adverse effects of climate change coupled with sufficient flexibility to adapt and respond to the challenges (and possibly opportunities e.g. developing localised renewable energy generation facilities) climate change will present.</p>	<p>Delete reference to “in particular low and zero carbon regionally significant infrastructure” in this policy.</p>	<p>Refer to s42A report for amendments.</p>	<p>Amend clause b) of s42A report to read as follows:</p> <p><i>b) recognise <u>and provide for</u> the social, economic, cultural and environmental benefits of other regionally significant infrastructure, <u>and enable activities which support their ability to respond to the changing needs of the climate and/or contribute to reducing greenhouse gas emissions.</u></i></p>
<p>Proposed Amendment to Chapter 3.8 Natural Hazards</p>					

PROVISION	POSITION	REASONS	RELIEF SOUGHT (subject to general relief sought in the covering submission)	S42A POSITION AND RECOMMENDED TEXT	CLAIRE HUNTER – RECOMMENDATIONS
Objective 19 The risks and consequences to people, communities, their businesses, property, and infrastructure and the environment from natural hazards and the effects of climate change effects are reduced minimised.	Support in part	WIAL supports the intent of this objective, however it is unclear what is meant by the term “minimise” This needs to be defined as per the Council’s proposed Natural Resources Plan	Define minimise as per the Council’s PNRP namely “Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.” Otherwise delete the amendment.	Amend as follows: <i>The risks and consequences to people, communities, their businesses, property, and infrastructure and the environment from natural hazards and the effects of climate change effects are reduced avoided or minimised.</i> Add definition of minimised to be consistent with NRP.	Support s42A report recommendations.
Objective 20 <u>Natural hazards and climate change mitigation and adaptation activities minimise the risks from natural hazards and impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity.</u>	Support in part.	WIAL submits that it is unclear what is meant by the term “minimise” This needs to be defined as per the Council’s proposed Natural Resources Plan	Define minimise as per the Council’s PNRP namely “Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.” Otherwise delete the amendment.	Add definition of minimised to be consistent with NRP.	Support s42A report recommendations.
Objective 21 <u>The resilience of our communities are more resilient to natural hazards, including the impacts and the natural environment to the short, medium, and long-term effects of climate change, and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.</u>	Support in part	WIAL supports ensuring that communities and the environment are made more resilient to and are better prepared for natural hazard events. This should be extended to also ensure regionally significant infrastructure is similarly managed.	Amend the objective as follows: <u>The resilience of our communities, regionally significant infrastructure, and...</u>	Amend as follows: <i>The resilience of our communities, and the natural environment is strengthened to the short, medium and long term effects of climate change and sea level rise, and people are better prepared for the consequences of natural hazard events.</i>	Amend as follows: <i>The resilience of our communities, infrastructure and the natural environment is strengthened to the short, medium and long term effects of climate change and sea level rise, and people are better prepared for the consequences of natural hazard events.</i>
Policy 29: Avoiding inappropriate Managing subdivision, use and development in areas at risk from natural hazards – district and regional plans Regional and district plans shall:	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	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	s42A report recommendations to amend clause (d) to appropriately recognise that there may be functional or operational needs to locate activities (particularly those associated with regionally significant	Support s42A report recommendations.

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<p>(a) identify areas <u>affected by</u> natural hazards; and</p> <p>(b) <u>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;</u></p> <p>(c) include <u>objectives, polices and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and</u></p> <p>(d) <u>include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.</u></p>		<p>infrastructure providers natural hazard tolerance is therefore inherently different to those without the same operational and functional need to locate in such areas.</p>	<p>extreme, <u>unless there is a functional or operational need locate in such areas.</u></p>	<p>infrastructure) in areas of high natural hazards.</p>	
<p>Policy 51: Minimising the risks and consequences of natural hazards – consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to:</p> <p>(a) the frequency and magnitude likelihood and consequences of the range of natural hazards that may</p>	<p>Oppose in part</p>	<p>As above, WIAL submits that for certain activities, the risk to natural hazards is inherently different to those activities that do not have the same operational and functional need to locate in areas deemed to be high hazard locations. It would be inappropriate for this policy to constrain the development of the Airport for example on the basis of its proximity to the coast.</p>	<p>Delete this policy or amend to acknowledge that regionally significant infrastructure is not inappropriate development in certain high hazard locations.</p>	<p>Amend clause (g):</p> <p><i>(g) avoiding inappropriate subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme; in areas at high risk from natural hazards, unless there is a functional or operational need to be located in these areas;</i></p>	<p>Support s42A report recommendations.</p>

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<p>adversely affect the proposal or development subdivision, use or development, including residual risk those that may be exacerbated by climate change and sea level rise,</p> <p>(b) the potential for climate change and sea level rise to increase in the frequency or magnitude of a hazard event;</p> <p>(c) whether the location of the subdivision, use or development will foreseeably require hazard mitigation works in the future;</p> <p>(d) the potential for injury or loss of life, social and economic disruption and civil defence emergency management implications – such as access routes to and from the site;</p> <p>(e) whether the subdivision, use or development causes any change in the risk and consequences from natural hazards in areas beyond the application site;</p> <p>(f) minimising effects on the impact of the proposed subdivision, use or development on any natural features that may act as a buffer to or reduce the impacts of a from natural hazards event; and where development should not interfere with their ability to reduce the risks of natural hazards;</p> <p>(g) avoiding inappropriate subdivision, use or development and hazard</p>					

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<p>sensitive activities where the hazards and risks are assessed as high to extreme; in areas at high risk from natural hazards;</p> <p>(h) appropriate hazard risk management and/or adaptation and/or mitigation measures for subdivision, use or development in areas where the hazards and risks are assessed as low to moderate hazard areas, including an assessment of residual risk; and</p> <p>(i) the allowance for floodwater conveyancing in identified overland flow paths and stream corridors; and</p> <p>(j) the need to locate habitable floor areas levels of habitable buildings and buildings used as places of employment above the 1% AEP (1:100 year) flood level, in identified flood hazard areas.</p>					
<p>Policy 52: Minimising adverse effects of hazard mitigation measures – consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given to:</p> <p>(a) the need for structural protection works or hard engineering methods;</p>	<p>Support in part</p>	<p>WIAL generally supports Policy 52(c) in that it recognises that structural protection works and/or hard engineering methods may be necessary to protect regionally significant infrastructure from hazard risk. This is relevant to the seawall which currently exists to protect existing infrastructure from the effects of coastal erosion and storm surges. It is noted however that the first preference in the RPS is to avoid such structures. With respect to the sea wall avoidance cannot</p>	<p>Delete this policy and explanation, or make it clear that in some situations hard engineering methods can be preferred in order to protect existing regionally significant infrastructure assets and limit reference to Te Mana o te Wai and Te Rito o te Harakeke</p>	<p>Refer to s42A report for amendments.</p>	<p>Amend clause c) as follows:</p> <p><i>Avoiding structural protection works or hard engineering methods, <u>except in areas where it is necessary to protect existing development, regionally significant infrastructure or property from unacceptable natural hazard risk. and the works form part of a long-term hazard management strategy agreed to by relevant authorities that represents the best practicable option for the future;</u></i></p> <p>Delete clause d):</p>

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<p>(b) whether non-structural, soft engineering, green infrastructure, <u>room for the river or Mātauranga Māori options provide a more appropriate or suitably innovative solution;</u></p> <p>(c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, <u>regionally significant infrastructure</u> or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future;</p> <p>(d) <u>the long-term viability of maintaining the structural protection works with particular regard to how climate change may increase the risk over time;</u></p> <p>(e) <u>adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity;</u></p> <p>(f) <u>sites of significance to mana/tangata whenua identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a city, district or regional plan;</u></p> <p>(g) <u>a no more than minor increase in risk to nearby areas as a result of</u></p>		<p>practicably be the first preference in such a location. It is also not clear how such requirements as the “long term viability of maintaining the structural protection works” will be measured in the context of this policy. Does it mean that ongoing maintenance has to be avoided? Or does it require that the structure is able to withstand changes as a result of climate change and therefore should be maximised in terms of its engineering and construction.</p> <p>Reference is made to adverse effects on Te Mana o te Wai which is a concept of the NPS FW and not be applicable to the CMA and Te Rito o te Harakeke which as defined is overly broad.</p>			<p>the long-term viability of maintaining the structural protection works with particular regard to how climate change may increase the risk over time;</p> <p>There are also grammatical issues with regards to clause (g) which means it should be amended as follows:</p> <p style="text-align: center;"><i>(g) <u>effects on other nearby areas as a result of changes to natural processes from the hazard mitigation works.</u></i></p> <p>Amend the final paragraph of this policy as follows:</p> <p><i>So that they minimise and do not increase the risks from natural hazards.</i></p>

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<p><u>changes to natural processes from the hazard mitigation works;</u></p> <p>(h) the cumulative effects of isolated structural protection works;</p> <p>(i) <u>any</u> residual risk remaining after mitigation works are in place,</p> <p>so that they <u>minimise</u> reduce and do not increase the risks from of natural hazards.</p>					