

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S2 Zara Wills</b>	S2.001	General comments - overall	Oppose in part	Regional Council will be taking a step backwards to what the Kainga Ora / Government are wanting to achieve and do. Regional council should not restrict any existing identified greenfield development. Outside of these areas yes, but not existing identified greenfield or where there is a need for it.	Allow greenfield development where it has already been identified or where there is a need for it.
<b>S2 Zara Wills</b>	S2.002	General comments - overall	Oppose in part	As a resident of Wainuiomata North, I would like the Regional City Council to allow Wainuiomata North to be further developed. Wainuiomata North is the only greenfield area left that has been identified for development in the Lower Hutt area. This area is also included in the Regional growth framework. Properties have already been purchased by developers waiting for HCC to allow/rezone residential development. The regional council will be the reason for not allowing more housing when we have a housing crisis.	Exclude Wainuiomata North, and other greenfield areas identified in the Wellington Regional Growth Framework, from any new restrictions that would stop or make it very difficult to develop the area for residential housing.
<b>S11 Outdoor Bliss Heather Blissett</b>	S11.023	General comments - overall	Support in part	Can we remove all the words information, promote, support and encourage to an action. We have been doing this for years and now is time for action. Still too passive. My local Council have been ignoring your information, promotion, support and encouragement to date. The document is far too passive.	Use stronger language throughout the document: Replace "information", "promote", "support" and "encourage" with "implement" or "incentivize" (or better word), Replace "consideration" with "essential". Replace "non-regulatory" with "regulatory".
<b>S17 Chelsea Kershaw</b>	S17.007	General comments - overall	Not Stated / Neutral	Not stated.	Councils' planning, regulatory and consenting teams to be upskilled in climate change policy and density-done-well by intensification.
<b>S18 Kit Withers</b>	S18.001	General comments - overall	Support	Support GWRC leading the way on preparing for climate change.	Retain provisions to relate to preparing for climate change.
<b>S27 Peter Ramage</b>	S27.005	General comments - overall	Not Stated / Neutral	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification
<b>S29 Aggregate and Quarry Association (AQA)</b>	S29.005	General comments - overall	Support in part	Under the existing NPS-FM, mineral and aggregate extraction is prohibited on land deemed to be natural wetlands, the definition of which is very broad. The Government is taking steps to amend this with a revised definition and by	RPS Change 1 not to be finalized before the release of revised NPS-FM.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				introducing a consent pathway for minerals and aggregates.	
<b>S29 Aggregate and Quarry Association (AQA)</b>	S29.006	General comments - overall	Support	The NPS Highly Productive Land has recently been released and the NPS-Indigenous Biodiversity is to be released later in the year. Both statements recognise the significance of aggregate extraction.	The RPS should be consistent with the existing and upcoming NPS.
<b>S31 Robert Anker</b>	S31.033	General comments - overall	Oppose	<p>The submitter referred to Clause 44 of Preamble to the Proposed Regional Policy Statement. Council order paper (p.10) (18 August 2022)</p> <p>This clause clearly states that it is the deliberate intention of GWRC to use the RPS to create a change in the directives contained in NPS-UD by wrapping constraints around housing intensification direction. In doing so GWRC is acting Ultra Vires and is once again following the path for which it was severely admonished by the Environment Court in that it is making regulation by fiat. All Councillors have made themselves a party to this intention and are jointly and severally responsible for it.</p> <p>The community is increasingly troubled by the council's apparent belief that it has the right, power and mandate to regulate matters more properly the domain of central government, and to ignore limits imposed by central government where the council disagrees.</p> <p>It is not the place of the GWRC to be the self-appointed arbiter in deciding which parts of Government policy contained in a NPS it will choose to fully implement. Local government's role is to implement what central government has mandated, not to go beyond and create regional inconsistencies.</p>	Amend the document to remove any and all clauses that seek to implement the intention stated above which is contrary to the intent and direction contained in NPS-UD.
<b>S31 Robert Anker</b>	S31.035	General comments - overall	Oppose	<p>Page 15, The focus of RPS Change 1 is to implement and support the National Policy Statement on Urban Development 2020 (NPS-UD),</p> <p>Another statement of support and again the intention to constrain makes this disingenuous.</p>	Require GWRC to be consistent and not pose contradictory statements in the document.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

<b>Submitter</b>	<b>Submission Point</b>	<b>Provision</b>	<b>Stance</b>	<b>Reasons</b>	<b>Decision Requested</b>
<b>S35 Oliver Bruce</b>	S35.004	General comments - overall	Support	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification.
<b>S37 Jennifer Van Beynen</b>	S37.004	General comments - overall	Not Stated / Neutral	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification.
<b>S50 Michael Kennedy</b>	S50.001	General comments - overall	Oppose	Cars are not the problem its petrol and diesel cars thats the problem.	Withdrawl RPS Change 1.
<b>S53 Ellen Legg</b>	S53.004	General comments - overall	Support	Not stated.	Council planning, consent, and regulatory teams should be up skilled so they have greater ability to create density done well.
<b>S56 Sam Gilkison</b>	S56.002	General comments - overall	Not Stated / Neutral	Cars are not the issue. Its petrol and diesel cars that are. Electric cars have zero emissions. The bus isn't for everyone. A lot of people will always drive no matter what and you can't change their minds.	Encourage people to replace petrol cars with electric cars in areas with no public transport.
<b>S60 Grant Buchan</b>	S60.005	General comments - overall	Support	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification
<b>S61 Patrick Morgan</b>	S61.005	General comments - overall	Support	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification.
<b>S63 Mary Beth Taylor</b>	S63.001	General comments - overall	Support	Supports the Proposed Change 1 to the RPS for Wellington Region in its entirety	Retain as notified, with some suggested amendments.
<b>S63 Mary Beth Taylor</b>	S63.011	General comments - overall	Not Stated / Neutral	Not stated.	Work with Ministry of Education and NZQA to include Environmental Studies at all levels of schooling with standards for assessment on the qualifications framework .

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S63 Mary Beth Taylor</b>	S63.015	General comments - overall	Not Stated / Neutral	Not stated.	Change the building code to make rain water collection and storage tanks, meters for reticulated water, storm water for toilet flushing, on site renewable energy generation or community generation, and triple glazing in certain areas, and WOF for all septic systems in rural areas.
<b>S63 Mary Beth Taylor</b>	S63.016	General comments - overall	Not Stated / Neutral	Not stated.	Local councils should create a new committee for Water Strategy in order to more easily draft policy at the local level.
<b>S64 Rachel Bolstad</b>	S64.003	General comments - overall	Support	Support the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
<b>S67 Pareraho Forest Trust</b>	S67.001	General comments - overall	Support	<p>We need to make changes now to shape the future of our towns and cities to ensure goals around improving the health of our streams and oceans, our protection of biodiversity and our transition to low-carbon lifestyles are achieved.</p> <p>This must mean focusing future housing intensification around our railway lines, and getting that intensification right, including with the provision of quality water infrastructure, community and green spaces, and access to nature.</p> <p>We must give greater statutory weighting to climate change mitigation and adaptation opportunities.</p>	Retain RPS Pland Change 1 in its entirety.
<b>S68 Georgia Morgan</b>	S68.001	General comments - overall	Support	Support, especially around travel	Retain as notified.
<b>S71 Parents for Climate Aotearoa</b>	S71.001	General comments - overall	Support	Parents for Climate Aotearoa fully support the proposed Regional Policy Statement. We need to maintain regional emissions reduction target to stay within 1.5 degrees of warming above pre-industrial levels, including 50% reduction by 2030 and net zero by 2050. Applying a climate lens to every decision made in these areas is crucial and these decisions and choices must be future proofed. Decisions made today impact generations beyond our own and as current leaders in this space, GWRC has a responsibility	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				to ensure decisions made are in line with the science and in the best interest of ALL in our communities.	
<b>S72 Rozalie Brown</b>	S72.001	General comments - overall	Support in part	There is a need to show the interconnections between central government, regional government and the local bodies and various pieces of legislation.	The inclusion of a flow chart to show the weaving of the harakiki with the following acts and plans included: *SPA (stratigic planning act), *CAA (Climate adaption act), *NBA (Natural Build Environment act), *NAP (Natural adaption plan), *EDAP (energy descent action plan).
<b>S72 Rozalie Brown</b>	S72.002	General comments - overall	Not Stated / Neutral	The removal of the word "resource" is to future proof Change 1 when RMA is fully replaced by NBA.	Remove the word "resource"
<b>S73 Alicia Hall</b>	S73.001	General comments - overall	Support	As a parent and resident of Pōneke Wellington I fully support the proposed Regional Policy Statement.  I support GWRC to make decisions and policies that benefit the wellbeing and health of all communities, all people and to enrich and enhance our biodiversity and environment. Being good ancestors for our tamariki.	Retain as notified.
<b>S74 Finn Hall</b>	S74.001	General comments - overall	Support	Kia ora,  My name is Finn and I am 13 years old. I have lived in the Wellington Region since I was 3 years old. I am writing on behalf of my siblings, Tara (7) and Brodie (11) and myself.  We support the Regional Policy Statement.	Retain as notified.
<b>S75 Te Aka Tauira - Victoria University of Wellington Students</b>	S75.004	General comments - overall	Support	Generally supports the proposed change and is fully in support of work to ensure Wellington is protected for future generations, to ensure students have access to warm and liveable housing and a city that is liveable and thriving.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Association (VUWSA)</b>					
<b>S75 Te Aka Tauira - Victoria University of Wellington Students Association (VUWSA)</b>	S75.005	General comments - overall	Not Stated / Neutral	<p>VUWSA supports the use of plain language in all areas of government, including local bodies like regional councils. Active participation is a core pillar of democracy and with more students working longer hours or multiple jobs to meet rising living costs, they need to be able to easily read and understand changes to regulations that have implications for them, so they can provide their input and ensure that their voice is heard.</p> <p>In the future, it would be great to see these documents become more accessible to the communities they serve through plain language or the inclusion of documents such as a summary and overview information sheet. Not only does this benefit those who are time-poor, but also those whose first language is not English</p>	Ensure the provisions use plain language or include documents such as a summary and overview information sheet.
<b>S76 Gene Clendon</b>	S76.003	General comments - overall	Support in part	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools than TDM plans. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive, rather than diluted.
<b>S76 Gene Clendon</b>	S76.004	General comments - overall	Support	Supports the provisions for uplifting Te Mana o te Wai.	Retain, refine and enhance provisions.
<b>S78 Beef + Lamb New Zealand Limited</b>	S78.001	General comments - overall	Oppose	<ol style="list-style-type: none"> <li>1. The NPS-UD is the primary driver for PC1. Expansion of the scope of PC1 to include freshwater, indigenous biodiversity and climate change response is premature and unnecessary.</li> <li>2. Although Whaitua Implementation Programmes have been developed for three of the five Whaitua, the process has not yet concluded in all Whaitua. Therefore, the proposed PC1 freshwater policies are not fully informed by the outcomes of Whaitua engagement processes.</li> <li>3. There is a risk that the climate change and indigenous biodiversity provisions will misalign or conflict with national guidance.</li> </ol>	Withdraw all proposed amendments, apart from those detailed in other submission points.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				4. PC1 is inconsistent with the Zero Carbon Act and New Zealand's wider approach to climate change	
<b>S80 Anders Crofoot</b>	S80.006	General comments - overall	Oppose	I wish to support the submission of Wairarapa Federated Farmers.  The Wairarapa Federated Farmers submission goes into much greater detail than my submission and I am in broad agreement with it.	Support the submission of Wairarapa Federated Farmers.
<b>S84 Tony Randle</b>	S84.001	General comments - overall	Oppose in part	Proposed Change 1 to the Regional Policy Statement for the Wellington Region is both complex and difficult to understand.	Requests additional time to consider proposed changes.
<b>S85 Lachlan Patterson</b>	S85.002	General comments - overall	Support	Car-dependent sprawling developments should not be the norm, or even tolerated, in a climate crisis. We need our development and urban form to work in tandem with the radical mode shift we need for a zero carbon capital city.  Support the changes that ensure Councils require new developments to minimise private vehicle use and encourage public and active transport instead. New subdivisions will last for decades. The way they are developed and designed now will lock in dependence on particular modes that are bad for our planet and also bad for communities and their wellbeing. This needs to be avoided at the start. Support the need for travel demand management plans in these developments.  Any tools in the RPS to support Councils to discourage car dependency ought to be strengthened where possible.	Retain as notified.
<b>S85 Lachlan Patterson</b>	S85.004	General comments - overall	Support	Strongly support the provisions incorporating Te Mana o te Wai, supporting the Blue Belt, and supporting climate resilient urban areas.	Retain as notified.
<b>S88 River Wicks</b>	S88.001	General comments - overall	Not Stated / Neutral	Supports the requiring developers to prove they won't put an undue burden of cars on our roads as empirically car-centric low-density housing is expensive in cost, negative for the environment, and alienates New Zealanders from each other by placing greater distance between them. It also produces large amounts of noise pollution, which	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				has severe and hard-to-understate negative effects on all aspects of our health.  Infrastructure lasts a very long time. Let's not lock in the mistakes of the last century this century.	
<b>S89 VicLabour</b>	S89.009	General comments - overall	Support	Support the overall proposed Regional Policy Statement changes and supports direction in the space of climate, urban development, and freshwater to ensure that we are heading towards being a climate-friendly and low-emissions city, alongside genuinely abiding by our Te Tiriti obligations.	Retain as notified.
<b>S90 Bronwyn Bell</b>	S90.003	General comments - overall	Support	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools than TDM plans. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive, rather than diluted.
<b>S90 Bronwyn Bell</b>	S90.005	General comments - overall	Not Stated / Neutral	Not stated.	Request councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing "density done well" by intensification.
<b>S90 Bronwyn Bell</b>	S90.006	General comments - overall	Support	Supports the provisions for uplifting Te Mana o te Wai	Retain, refine and enhance provisions.
<b>S95 Tony Chad</b>	S95.001	General comments - overall	Support	Supports the Proposed Change 1 to the RPS for Wellington Region in its entirety	Retain as notified, with some suggested amendments.
<b>S95 Tony Chad</b>	S95.004	General comments - overall	Support in part	Central Government is too slow to rein in carbon emitting agriculture	Require Regional Plans to have Carbon Reduction Plans (CRPs)
<b>S95 Tony Chad</b>	S95.010	General comments - overall	Not Stated / Neutral	Not stated.	Work with Ministry of Education and NZQA to include Environmental Studies at all levels of schooling with standards for assessment on the qualifications framework .
<b>S95 Tony Chad</b>	S95.012	General comments - overall	Not Stated / Neutral	Not stated.	Local councils should create a new committee for Water Strategy in order to more easily draft policy at the local level.
<b>S95 Tony Chad</b>	S95.015	General comments - overall	Not Stated / Neutral	Not stated.	Change the building code to make rain water collection and storage tanks, meters for reticulated water, storm water for toilet flushing, on site renewable energy generation or community generation, and triple glazing in certain areas,



SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					and WOF for all septic systems in rural areas.
<b>S100 Meridian Energy Limited</b>	S100.029	General comments - overall	Not Stated / Neutral	Tables 1A, 3, 4, 6 (a) and 9.  Some amendments may be necessary where changes are made to the titles of policies and methods.	Amend the titles of the policies and methods referred to in Tables 1A, 3, 4, 6(a) and 9 where necessary to reflect any amendments made as a result of the foregoing submission points 1 to 28.
<b>S102 Te Tumu Paeroa   Office of the Māori Trustee</b>	S102.032	General comments - overall	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.
<b>S106 Patricia (Dr) Laing</b>	S106.001	General comments - overall	Support	Support integrated management approach of the region's natural and built environment guided by Te Ao Māori.	Not Stated.
<b>S106 Patricia (Dr) Laing</b>	S106.002	General comments - overall	Oppose in part	Plan Change 1 is complicated, unworkable; and, will put unreasonable demands and high cost pressures on landowners. Furthermore, freshwater provisions have been extended beyond what they should be, serving to prevent important consultation to clarify what will happen on the ground. There are also matters of process, and gaps in the content, that undermine an integrated management approach, and that therefore desperately need to be addressed.	Not stated.
<b>S106 Patricia (Dr) Laing</b>	S106.003	General comments - overall	Not Stated / Neutral	NPS-IB is at exposure draft stage now (so not gazetted) so disagrees with the statement that the direction of the NPS-IB is clear at present.	Wait to align Plan Change 1 with NPS:IB once the direction of the NPS:IB is clear.
<b>S106 Patricia (Dr) Laing</b>	S106.004	General comments - overall	Oppose	Inadequate consultation and input with stakeholders in the apiculture industry. No apicultural representative was included in the Farming Reference Group. This can undermine an integrated management approach.	Need to rectify the lack of consultation with the apiculture industry.
<b>S106 Patricia (Dr) Laing</b>	S106.005	General comments - overall	Not Stated / Neutral	The NPS-UD has implications for beekeeping. In the Upper Hutt City Council area the titles in some new developments limit the number of beehives that property owners can host. On the other hand, some commercial beekeepers have arrangements with UHCC to place high numbers of hives on	Landowners' usage rights relating to beekeeping need clarification.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				Council land adjoining new developments which raises a question about whether this could be regarded as "boundary stacking".	
<b>S106 Patricia (Dr) Laing</b>	S106.006	General comments - overall	Not Stated / Neutral	The list of pests to be managed under Plan Change 1 does not include wasps that in some cases threaten the continuity of apicultural endeavours in the region.	Add wasps to the list of pests managed by the GreaterWellington Regional Council.
<b>S106 Patricia (Dr) Laing</b>	S106.008	General comments - overall	Not Stated / Neutral	Disagrees with pre-empting the national direction Te Tatai utu o nga Tukunga Ahuwhenua: Pricing Agricultural Emissions before it has been finalised as it has only just been released for consultation.	Not stated.
<b>S113 Wellington Water</b>	S113.032	General comments - overall	Not Stated / Neutral	Table 15 in Appendix 1 of the RPS and Schedule H of the pNRP are inconsistent.	Update Table 15 of RPS Appendix 1 (Rivers and lakes with significant amenity and recreational values) to align with Schedule H of the pNRP.
<b>S114 Fulton Hogan Ltd</b>	S114.008	General comments - overall	Support in part	<p>It is critical that Regional Policy Statements (RPS) recognise and provide for the extraction of aggregate resources, as these contribute to the construction and maintenance of cost effective building, roads and housing.</p> <p>The importance of aggregate supply has been recognised in recent national policy direction such as the proposed draft of the National Environmental Standard for Freshwater (NES-F), and the National Policy Statement for Highly Productive Land (NPS-HPL). It is important that this support flows through the planning document hierarchy.</p>	Retain as notified
<b>S118 Peka Peka Farm Limited</b>	S118.019	General comments - overall	Support in part	Supports the overall intent to appropriately address matters relating to climate change, facilitating mode shift and active transport modes, sustainable urban development, and freshwater management. Has some concerns about the scope and effect of PC1, issues relating to clarity of drafting, along with ensuring that PC1 appropriately gives effect to the requirements of the NPS-UD. Concerned that PC1 should be the best and most appropriate resource management response to the issues being addressed, that PC1 appropriately gives effect to national direction, does not unduly duplicate	Amend objectives and policies to address the releif sought in the submission.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				national direction and does not confuse jurisdictional boundaries. The direction of the RPS needs to be clear so that it is not subject to interpretation. Considers that a number of objectives and policies do not achieve these aims.	
<b>S118 Peka Peka Farm Limited</b>	S118.020	General comments - overall	Not Stated / Neutral	Notes that the leadership role of Greater Wellington in facilitating some of the outcomes sought by PC1, including in its investment in and operation of existing and new public transport infrastructure and services. Both the planning framework and these investments need to be designed and implemented in a manner that supports and does not preclude otherwise appropriate development opportunities.	Not stated.
<b>S127 Neo Leaf Global</b>	S127.001	General comments - overall	Not Stated / Neutral	The NPS-IB has been subject to considerable re-editing over time and remains subject to many uncertainties. One of many concerns in the NPS-IB that has been carried through into this Proposed Change 1 relates to the concept of "buffer zones", a topic certainly not landed at this time.	Withdraw these amendments until the NPS-IB has been finalised.
<b>S127 Neo Leaf Global</b>	S127.003	General comments - overall	Not Stated / Neutral	The Proposed Change 1 is implementing "Te tātai utu o ngā tukunga ahuhenua Pricing Agricultural Emissions" before it has been finalised (only released for consultation this past week)	Withdraw provisions relating to agricultural emissions until Te tātai utu o ngā tukunga ahuhenua Pricing Agricultural Emissions" is finalised.
<b>S127 Neo Leaf Global</b>	S127.004	General comments - overall	Not Stated / Neutral	Major concerns both about the extent of provisions linked to Freshwater and, additionally, lack of appeal rights as a consequence. Particularly with infrastructure service provision including capital works, operation, maintenance and renewal, many activities intersect with freshwater.	The complete document be reviewed via expert solicitation to justify the Freshwater linkages and practical implications.
<b>S127 Neo Leaf Global</b>	S127.006	General comments - overall	Not Stated / Neutral	The process of restoration as outlined in this definition is wide sweeping and open ended. Whose desired former state is it? The assessment of what is needed to restore a habitat etc should not come down to the subjective opinion of a council official. Balancing perspectives are needed from expert advisors including community interests.	Replace "restore" and "restoration" to "enhancement" and "improvement" throughout the document.
<b>S127 Neo Leaf Global</b>	S127.009	General comments - overall	Not Stated / Neutral	Same as for S127.008 (At issue here is the presumption and lack of appreciation that nature-based solutions are not necessarily fit-for-purpose	Review the complete document to resolve other references and presumptions along these lines eg. Policy 52.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				in all circumstances and may not offer pragmatic durable, safe or cost-effective solutions, and can not necessarily perform the roles and standards that infrastructure is required to meet).	
<b>S127 Neo Leaf Global</b>	S127.010	General comments - overall	Support in part	Overall support, but has significant concerns over the draconian approach, workability and yet further cost escalation implications. This submission has a focus on ensuring the RPS is workable and effective.	Ensure RPS Plan Change 1 is workable and effective.
<b>S130 Renters United</b>	S130.001	General comments - overall	Support	Renters United is proud to support the Regional Policy Statement for the Wellington region ("the RPS"). We believe that the RPS supports our vision for an Aotearoa where everyone has access to a stable, warm, affordable home and where everyone can meaningfully enforce their human right to a decent home.	Retain as notified.
<b>S130 Renters United</b>	S130.002	General comments - overall	Support	<p>The proposed changes set a clear direction that everyone deserves access to good housing. If we want to leave neighbourhoods that last generations we need to ensure that they don't contribute to an unsustainable climate.</p> <p>Renters live in poorer quality housing, don't benefit from rising land values, and find it hard to see a future where they have the option of renting a home that is stable, warm and affordable. The lack of good housing is a major contributor to the stress that renters face. A good home is beyond what's inside its four walls. A good home has plenty of local amenities, shared green spaces, and is well connected to other areas of the city.</p>	Retain as notified.
<b>S130 Renters United</b>	S130.004	General comments - overall	Support	Support the use of plain language in all areas of government, including local bodies like regional councils. Active participation is a core pillar of democracy and with more renters working longer hours or multiple jobs, they need to be able to easily read and understand changes to regulations that have implications for them, so they can provide their input and ensure that their voice is heard.	Ensure the provisions use plain language.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S131 Ātiawa ki Whakarong otai Charitable Trust</b>	S131.001	General comments - overall	Support in part	In principle Ātiawa supports the overall intent of the RPS Change 1, to address significant and urgent resource management issues (climate change, indigenous biodiversity, freshwater and urban development). However, there are further amendments required to provide for Ātiawa ki Whakarongotai values and role as mana whenua.	Amend RPS Change 1 to provide for Ātiawa ki Whakarongotai values and role as mana whenua.
<b>S131 Ātiawa ki Whakarong otai Charitable Trust</b>	S131.002	General comments - overall	Support	Ātiawa supports an integrated approach to resource management. The concept of integrated management aligns with te tirohanga Māori/Māori worldview of understanding te ao Tūroa, the natural world as an interconnected, interdependent whole. These provisions enable mana whenua values and provide for our mātauranga to be applied to resource management.	Retain as notified.
<b>S131 Ātiawa ki Whakarong otai Charitable Trust</b>	S131.007	General comments - overall	Not Stated / Neutral	<p>Mana whenua have an interest in all parts of te ao Tūroa/the natural world. Ātiawa look forward to strengthening our relationship with Greater Wellington Regional Council.</p> <p>Although Ātiawa is pleased that mātauranga Māori is being given its due recognition by Regional Council, Ātiawa stress that mātauranga Māori and other forms of Māori data must be provided the appropriate protections. This includes, Māori data sovereignty, including but not limited to the way Māori data is stored, protected, accessed, shared, used and analysed. Ātiawa support provisions that seek to develop tikanga and kawa to govern Māori data sovereignty, we look forward to developing tikanga and kawa for data sovereignty for mātauranga-a-Ātiawa ki Whakarongotai.</p>	Ātiawa seek a partnership with Greater Wellington Regional Council across all resource management matters, Ātiawa seeks that Regional Council move beyond thinking that limits mana whenua values to 'cultural' or 'spiritual', this philosophy is out-dated and unfairly restricts mana whenua involvement in resource management and decision-making processes.
<b>S133 Muaūpoko Tribal Authority</b>	S133.001	General comments - overall	Oppose in part	Historical evidence indicates in several instances that Muaūpoko iwi has strong ancestral and historical connections to Te Whanganui-a-Tara. Muaūpoko's traditional rohe includes Te Whanganui-a-Tara on the Kāhui Māngai site which represents the area over which Muaūpoko exercises kaitiakitanga for the purposes of the RMA.	Acknowledge Muaūpoko connection with TeWhanganui-a-Tara throughout the RPS in any relevant provisions or introductory text.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S133 Muaūpoko Tribal Authority</b>	S133.003	General comments - overall	Oppose in part	There are several grammatical and sentence structure errors throughout the plan change. Requests that GWRC undertake a general sense and grammar check throughout the plan to ensure amendments are robust and reflect the intent of changes.	A general grammar and sense check is undertaken to reflect the intent and produce desired outcomes from Plan Change 1.
<b>S133 Muaūpoko Tribal Authority</b>	S133.076	General comments - overall	Oppose in part	<p>Our whakapapa described above indicates several instances that Muaūpoko iwi have strong ancestral and historical connections to Te Whanganui-a-Tara. At the highest level the Māori name for Wellington is named for one of our key eponymous ancestors.</p> <p>Muaūpoko traditional rohe on the Kāhui Māngai site: <a href="https://www.tkm.govt.nz/iwi/muaupoko/#">https://www.tkm.govt.nz/iwi/muaupoko/#</a></p> <p>As stated above: This rohe map represents the area over which Muaūpoko exercises kaitiakitanga for the purposes of the Resource Management Act 1991.</p> <p>The GWRC Regional Policy Statement (RPS) definitions include:</p> <p>Kaitiakitanga: as defined in the Resource management Act. The exercise of uardianship by tangata whenua of an area in accordance with tikanga Māori in relation to natural and physical resources. It includes the ethic of stewardship.</p> <p>Tangata whenua: Māori with ancestral claims to a particular area of land and resources. Literally translated as "people of the land." Iwi are tangata whenua of a particular rohe, whole all Māori are tangata whenua of Aotearoa.</p> <p>Given the rohe map and historical evidence indicates Muaūpoko rohe extends over the Wellington region and is stated as the area which Muaūpoko exercises kaitiakitanga over for the purposes of the RMA, Muaūpoko connection with the land and waters in Te-Whanganui-a-Tara should be recognised and provided for in the Regional Policy</p>	Amend the RPS to appropriately recognise Muaūpoko connection to Te-Whanganui-a-Tara throughout the policy statement. Consider a future plan change which includes formal recognition of Muaūpoko as mana whenua, with connections within the Wellington Region, including in the Tangata Whenua chapter

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>Statement.</p> <p>Muaūpoko were not consulted under Clause 3(1)(d), 1st Schedule of the RMA 1991 in the preparation of the proposed plan change. This clause states:</p> <p>1. During the preparation of a proposed policy statement or plan, the local authority concerned shall consult--</p> <p>...</p> <p>d. the tangata whenua of the area who may be so affected, through iwi authorities; and</p> <p>...</p> <p>Amendments to Plan Change 1 are therefore requested that appropriately provide for matters affecting Muaūpoko.</p>	
<p><b>S136 DairyNZ</b></p>	<p>S136.001</p>	<p>General comments - overall</p>	<p>Oppose</p>	<p>Recent direction from the High Court to Otago Regional Council, on the Proposed Otago Regional Policy Statement indicates the scope for use of the streamlined freshwater planning process is narrower than GWRC appears to consider.</p> <p>Further, concerned at the significant lack of robust analysis in the s32 analysis of PC1 to the RPS, particularly in relation to climate change, freshwater and biodiversity under PC1, including a lack of assessment of the economic and social costs to primary production, rural communities and the regional economy, and a lack of assessment given to the costs and benefits of waiting for further national direction in these areas.</p> <p>Considers a more efficient and effective process would be to postpone these changes to the RPS with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3), to allow for a more robust assessment of the proposed provisions and to provide for further national direction in these areas, to enable a</p>	<p>Reduce scope to changes needed to address the NPS-UD and urban climate change related issues only. Postpone all other changes (freshwater, biodiversity, climate change) until at least the scheduled full review of the RPS and Regional Plan in 2024.</p>

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				better-informed assessment of GWRC's role in addressing these issues.	
<b>S139 Ian Gunn</b>	S139.002	General comments - overall	Support	Progress has been made to truly create a co governance structure in resource management. An iwi point of view will add a new dimension and advance resource management in the Wairarapa due to their holistic approach and feelings for the whenua and awa.	Retain as notified.
<b>S140 Wellington City Council (WCC)</b>	S140.001	General comments - overall	Support in part	Concerns with adding short timeframes when the reasoning cannot be found in the s32 report. Councils will likely be in the middle of transitioning to a new Resource Management legislative system which may not align with the proposed changes or be feasible to implement so many changes at once.	Remove or update all references to "30 June 2025" in the Regional Policy Statement.
<b>S141 Generation Zero Wellington</b>	S141.008	General comments - overall	Support	Supports the direction and vision that is enabled through these changes to the Regional Policy Statement, we see the need for this tool as a way to point the Wellington region along a path that supports greater climate, housing and environmental justice.	Retain as notified.
<b>S142 Combined Cycle Submitters (CCS)</b>	S142.006	General comments - overall	Support	Highly supportive of efforts to align provisions in the Regional Policy Statement with climate and mode shift commitments made by national, regional and local authorities, often in non-statutory documents.	Retain as notified.
<b>S148 Wellington International Airport Ltd (WIAL)</b>	S148.001	General comments - overall	Not Stated / Neutral	It is appropriate that the RPS continues to recognise the importance of the Airport in providing for the social, economic and cultural wellbeing of people and communities.  Functional, technical, operational and safety related constraints often influence the location of important infrastructure, such as airports. In the case of Wellington Airport, given the lack of suitable alternative locations, providing for the ongoing operation, development and growth of Wellington Airport in its current location and safeguarding the Airport's obstacle limitation surface and aircraft noise boundaries to ensure effective and efficient airport operations is therefore of regional significance.	Not stated.



SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<p><b>S148</b>  <b>Wellington International Airport Ltd (WIAL)</b></p>	<p>S148.010</p>	<p>General comments                      - overall</p>	<p>Support in part</p>	<p>The Proposal contains a number of provisions that have been notified as either using (the usual) Part One Schedule 1 process, or as part of a Freshwater Planning Process ("FPP"). Provisions which are subject to the FPP are annotated throughout the proposal documentation with the reference "FW".</p> <p>This has recently been tested in the Otago region in the High Court. In this case, the Otago Regional Council publicly notified the entirety of its Proposed RPS as a freshwater planning instrument. This was challenged by Forest and Bird and in its judgement (Otago Regional Council v Royal Forest and Bird Protection Society of New Zealand Incorporated [2022] NZHC 1777) dated 22 July 2022, the High Court declared that the Council's determination that the whole of the Proposed RPS is a freshwater planning instrument was wrong. The High Court then instructed the Council to satisfy itself as to which parts of the proposed regional policy statement qualify are part of a freshwater planning instrument because they relate directly to the maintenance or enhancement of freshwater quality or quantity. The Otago Regional Council has recently re-notified the freshwater components of its RPS and these are notably now very narrow in terms of the provisions which are being subject to the FPP.</p> <p>A number of the provisions within the RPS have been identified as progressing through the FPP. For the majority of these provisions, the relationship between freshwater and the provision is reasonably clear, however in some instances it is not. In accordance with the Ministry for the Environment's guidance which provides a high level overview of the FPP, it is understood that it was essentially established so as to allow expedited regional plan changes to give effect to the NPSFM, or otherwise relate to freshwater. It is therefore not clear how provisions such as those</p>	<p>Not stated.</p>

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>which more broadly relate to climate change, urban environments, all biodiversity and natural hazards should be progressed through the FPP. WIAL submits that such provisions are either not related to freshwater resources at all or relate to matters which may have some interaction or interplay with freshwater resources but are focussed on outcomes that are much broader.</p>	
<p><b>S148 Wellington International Airport Ltd (WIAL)</b></p>	<p>S148.011</p>	<p>General comments - overall</p>	<p>Oppose in part</p>	<p>In the absence of amendments to the RPS to address and give effect to the above submission points and those set out in Annexure A:</p> <p>The Proposal will not promote the sustainable management or efficient use and development of natural and physical resources;</p> <p>The Proposal is not the most appropriate way to achieve the purpose of the RMA, particularly when having regard to the efficiency and effectiveness of the provisions relative to other means;</p> <p>The Proposal does not appropriately fulfil the requirements of section 32 of the RMA, particularly in terms of evaluation the costs of implementing the provisions under section 32(2)(a); and</p> <p>The Proposal does not represent sound resource management practice particularly with respect to planning for Wellington International Airport, as regionally significant infrastructure.</p>	<p>That the submission points contained in Section 4 and Annexure A of the submission be accepted, or that the change to the RPS be amended in a similar or such other way as may be appropriate to address WIAL's submission points; and any alternative, consequential changes (including to methods and anticipated environmental results or other provisions), amendments or decisions that may be required to give effect to the matters raised in WIAL's submission.</p>
<p><b>S148 Wellington International Airport Ltd (WIAL)</b></p>	<p>S148.059</p>	<p>General comments - overall</p>	<p>Oppose in part</p>	<p>WIAL notes that not all of the provisions which have been earmarked for the freshwater planning process are directly related to the maintenance or enhancement of freshwater quality or quantity.</p>	<p>Ensure only those provisions which relate to the maintenance or enhancement of freshwater quality or quantity are subject to the fast-track freshwater planning process.</p>
<p><b>S151 NZ Centre for Sustainable Cities</b></p>	<p>S151.001</p>	<p>General comments - overall</p>	<p>Support</p>	<p>Strongly support Greater Wellington's proposals to change to its Regional Policy Statement ('Change 1') which would, among other things, implement directions required by the Government's National Policy Statements on Urban Development and Freshwater Management.</p>	<p>Not stated.</p>

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>S151 NZ Centre for Sustainable Cities</b>	S151.012	General comments - overall	Support in part	Strongly support that "Change 1" will significantly influence the shape of the region's cities and towns through encouraging urban intensification that will lead to lower emissions infrastructure and new, compact housing development around travel corridors.	Amend provisions to ensure that new development around travel corridors should consider a mix of uses (rather than simply housing) where possible and viable, to further support the creation of walkable neighbourhood environments that support wellbeing through equitable access to essential infrastructure and amenities, including green spaces.
<b>S151 NZ Centre for Sustainable Cities</b>	S151.014	General comments - overall	Support	The case for a change to the way we live in our cities, and the need for new transport and land use policies, is supported by a considerable amount of international evidence that we are familiar with, in the academic research literature (e.g. Creutzig et al., 2018; Javaid, Creutzig, & Bamberg, 2020; Lee & Lee, 2020).	Not stated.
<b>S152 Michelle Ducat</b>	S152.006	General comments - overall	Not Stated / Neutral	Not stated.	Councils' planning, regulatory and consenting teams be boosted and upskilled to become more comfortable and confident at doing "density done well" by intensification.
<b>S153 Meta Beyers</b>	S153.001	General comments - overall	Support	Buildings, streets, roads, parks etc will be there for decades, and how well they're done will profoundly limit (or enable) the people who live there. "Behaviour change" can't do anything meaningful when the entire landscape is pushing against it.  Future development and growth should make it possible for people to change their car dependency and live a productive, well-connected life.	Retain as notified.
<b>S154 Investore Property Limited</b>	S154.002	General comments - overall	Oppose in part	Council is required to amend the RPS to give effect to the NPS-UD and specifically the objectives and policies applying to tier 1 urban environments.  Specifically, the requirements to amend its RPS to enable building heights and urban form to reflect demand for housing and business use in metropolitan centre zones under Policy 3 of the NPS-UD.	Amend RPS to give effect to the NPS-UD to address the relief sought in the submission.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>However, the changes proposed under RPS Change 1 are not consistent with the recognition of metropolitan centre zones in the NPS-UD, which make it difficult for the Council to then implement Policy 3. The RPS may fail to give effect to the NPS-UD in this regard.</p> <p>Amendments are not supported as they fail to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.</p> <p>Seeks that RPS Change 1 is amended to enable an urban form in metropolitan centres that reflects the demand for housing and business use. In Johnsonville, this would reflect significant demand and intensification.</p> <p>The amendments to the RPS are disparate and are unlikely to achieve the strategic purpose of the NPS-UD, including Policy 1 of the NPS-UD to contribute to well-functioning urban environments.</p>	
<p><b>S155 Stride Investment Management Limited</b></p>	<p>S155.002</p>	<p>General comments - overall</p>	<p>Oppose in part</p>	<p>Council is required to amend the RPS to give effect to the NPS-UD and specifically the objectives and policies applying to tier 1 urban environments.</p> <p>Specifically, the requirements to amend its RPS to enable building heights and urban form to reflect demand for housing and business use in metropolitan centre zones under Policy 3 of the NPS-UD.</p> <p>However, the changes proposed under RPS Change 1 are not consistent with the recognition of metropolitan centre zones in the NPS-UD, which make it difficult for the Council to then implement Policy 3. The RPS may fail to give effect to the NPS-UD in this regard.</p>	<p>Amend RPS to give effect to the NPS-UD to address the relief sought in the submission.</p>

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>Amendments are not supported as they fail to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.</p> <p>Seeks that RPS Change 1 is amended to enable an urban form in metropolitan centres that reflects the demand for housing and business use. In Johnsonville, this would reflect significant demand and intensification.</p> <p>The amendments to the RPS are disparate and are unlikely to achieve the strategic purpose of the NPS-UD, including Policy 1 of the NPS-UD to contribute to well-functioning urban environments.</p>	
<b>S158 Kāinga Ora Homes and Communities</b>	S158.043	General comments - overall	Support	Supports the intent of PC1, in general, seeks better clarity within the objectives and policies so that they are measureable and provide direction as to how the objectives or policy can be achieved.	Seeks better clarity within the objectives and policies so that they are measureable and provide direction as to how the objectives or policy can be achieved. Amendments sought and required across all of PC1.
<b>S158 Kāinga Ora Homes and Communities</b>	S158.046	General comments - overall	Support in part	Giving effect to higher order documents - notes that PC1 includes provisions to give effect to the NPS-FM and provisions related to indigenous biodiversity, in anticipation of a new National Policy Statement on Indigenous Biodiversity. Whilst supports this, it is noted that the NPSFM is most likely subject to change through the exposure draft and that the National Policy Statement for Indigenous Biodiversity (NPS-IB) is yet to be gazetted. Both of these higher order documents will trigger and require the GWRC to make changes to the RPS to align with these higher order documents. In some instances, PC1 seeks requirements on landowners beyond the current NPS-FM that is considered to be more onerous and restrictive.	Seeks that amendments to PC1 are made to align and does not go beyond what is required under the NPS-FM and NPS-IB (once gazetted).
<b>S162 Winstone Aggregates</b>	S162.001	General comments - overall	Oppose in part	The proposed changes to the indigenous biodiversity provisions are entirely unworkable for aggregate extraction. Offsetting and compensation are important tools in the effects management hierarchy and restricting their use will result in	Amend the RPS to provide recognition and protection for significant mineral resources in a way that is consistent with the policy framework in the NRP and consistent with the NPS-FW (update) and NPS-IB when those documents are confirmed. Seek to work further with GWRC to accurately

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>unintended consequences, particularly for developments that provide the potential for significant ecological gains overall, via offsetting. These do not appear to have attempted to provide any recognition for the Exposure Draft of the NPS-FW (update) and draft NPS-IB both containing amendments that provide more viable pathways for mineral extraction.</p> <p>Requests that the RPS via PPC1 contains an updated policy framework and clear policy directives that provide and support an appropriate enabling consenting pathway for aggregate extraction and associated quarrying activities such as overburden placement in a similar to that of Regionally Significant Infrastructure. It is considered that this approach would better give effect to the recognition and management of aggregate extraction activities as set out in the NPS-FW (including the anticipated 2022 update) and draft NPS-IB.</p> <p>The Natural Resources Plan (NRP) includes a policy framework that specifically recognise the criticality of significant mineral and aggregate resources for the Wellington Region (including Objectives 9 and 11 of the NRP). However, the RPS does not currently provide consistent direction recognising the social, economic, cultural and environmental benefits of the utilisation of mineral and aggregates resources or the protection of land containing significant aggregate resources.</p> <p>The plan provides very little guidance as to how local authorities plans should manage conflicting considerations where mineral and aggregate resources are involved, and so a framework recognising the benefits of mineral and aggregate resources is important.</p>	<p>and appropriately reflect the NRP policy direction in the RPS.</p>
<p><b>S162 Winstone Aggregates</b></p>	<p>S162.002</p>	<p>General comments - overall</p>	<p>Oppose in part</p>	<p>Concerned that Plan Change 1 seeks to address issues such as housing supply and infrastructure pressures, as a result of the NPS-UD but that the provisions of the Plan Change will decrease our access and ability to supply the aggregate</p>	<p>Specific provision is made for aggregate and clean filling in PC1 to recognise the vital importance of these activities that underpin growth sought by the NPS-UD and provide Regional direction as to how the conflicts between NPS-FW</p>

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				required to address these problems. In the absence of policy recognition of the fundamental importance of mineral extraction and clean fill activities and contribution these materials make to construction and development, it will be difficult for housing and industry providers to meet the region's needs at a reasonable cost and for reducing waste to landfill.	and NPS-IB matters must be balanced.
<b>S162 Winstone Aggregates</b>	S162.003	General comments - overall	Oppose in part	The Plan Change introduces a number of new policies aimed at implementing the NPS-FM, which in fact do not properly give effect to the NPS-FM and PC1 does not appear to have amended/added new definitions to implement the NPS-FM. In particular it appears that the RPS does not implement section 3.22 of the NPS-FM, which relates to natural inland wetlands and which every Regional Council needs to 'give effect to' in their regional plan. The RPS should therefore provide consistent direction to what is required by the NPS-FM, and implemented in the Natural Resources Plan (NRP).	Requests that: <ul style="list-style-type: none"> <li>• The RPS amendments are updated to accurately reflect the direction sought by the NPS-FM,</li> <li>• The NPS-FM is given effect to in the NRP</li> <li>• New definitions are inserted into the RPS that reflect and are consistent with the NPS-FM definitions and the expected NPS-FM Update (due for release in December 2022).</li> </ul>
<b>S162 Winstone Aggregates</b>	S162.004	General comments - overall	Oppose in part	Concerned with the breadth of the Plan Change content that is subject to the Freshwater Planning Process (FPP), rather than the Schedule 1 process. The FPP process provides limited scope for future public input, and a large number of provisions are subject to the FPP where freshwater is not the primary issue, and is instead peripheral or only one of several issues to which the provision relates. Very concerned with this approach and considers that it is an inappropriate use of the FPP process.	Requests that the scope of the FPP versus Schedule 1 processes is reviewed and that only those provisions where freshwater is the primary issue are subject to the FPP.
<b>S162 Winstone Aggregates</b>	S162.005	General comments - overall	Oppose in part	The Draft NPS-IB Clause 3.11 lists the exceptions to clause 3.10(2)(a)(i) - one of those exceptions is mineral extraction - the RPS does not appear to refer to the exceptions and how effects coming within those exceptions should be managed a new objective and policy is required to do so.	Seeks that the RPS be amended to provide new objectives and policies and methods that provide for these exceptions in the Draft NPS-IB.
<b>S163 Wairarapa</b>	S163.001	General comments - overall	Oppose	Concerns that Plan Change 1 to the RPS includes climate change provisions which have been notified in advance of amendments to the RMA	RPS Change One should not include provisions relating to climate change, biodiversity and water. The scope of RPS Change One should be restricted to those changes

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<b>Federated Farmers</b>				which do not come into effect until 30 November 2022; and that it includes biodiversity provisions which seek to pre-empt the upcoming National Policy Statement for Indigenous Biodiversity (NPS-IB). Freshwater issues were to be addressed comprehensively as part of the full RPS review scheduled for 2024.	necessary to give effect to the National Policy Statement for Urban Development. Any other matters should be subject to proper review in the scheduled full review of the Regional Policy Statement in 2024; and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024.
<b>S164 Megan Lane</b>	S164.004	General comments - overall	Not Stated / Neutral	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing "density done well".
<b>S167 Taranaki Whānui</b>	S167.002	General comments - overall	Support in part	<p>We [the submitter] note the focus of RPS Change 1 is to implement and support the National Policy Statement on Urban Development 2020 (NPS-UD), and to start the implementation of the National Policy Statement for Freshwater Management 2020 (NPS-FM). RPS Change 1 also addresses issues related to climate change, indigenous biodiversity, and high natural character.</p> <p>We [the submitter] support the general policy direction of integrated management including the expectation that mana whenua / tangata whenua will be at the decision-making table. What is unclear is how this will be implemented, and we make a number of specific comments in this submission to specifically address these.</p>	Details of decision sought in submission points.
<b>S167 Taranaki Whānui</b>	S167.003	General comments - overall	Not Stated / Neutral	We [the submitter] note the future changes of the RPS in the form of RPS2 that will approach review of the tangata whenua chapter. We signal our aspiration to be involved and engaged in that process.	Taranaki Whaanui want to be involved in any future review of the RPS tanagta whenua chapter.
<b>S168 Rangitāne O Wairarapa Inc</b>	S168.001	General comments - overall	Not Stated / Neutral	Rangitāne o Wairarapa notes that many of the provisions as notified contain inconsistencies in grammatical tense and structure.	In some instances we have suggested wording to rectify this, but we ask that a comprehensive editorial review of the full plan change is undertaken to resolve these errors and inconsistencies.



SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<p><b>S169</b> <b>Kahungunu</b> <b>Ki</b> <b>Wairarapa</b></p>	<p>S169.013</p>	<p>General comments - overall</p>	<p>Not Stated / Neutral</p>	<p>The purpose of the Resource Management Act (1991) as outlined in Section 5, subsection 2 of the act is to ensure sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while-- (a) sustaining the potential of natural and physical resources (including water) to meet the reasonably foreseeable needs of future generations; and (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment. This purpose of is met by including aspects of national importance as outlined in this act, especially Section 6, subsection (e) that reads In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the matters of national importance including: the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga. Another aspect of this act is to the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga In the iwi expressions of Te Mana o Te Wai iwi are supporting section 7 of</p>	<p>Retain the iwi expressions of Te Mana o Te Wai as notified.</p>

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>the the Resource Management Act, where it states:                      all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to                      1. kaitiakitanga:(aa) the ethic of stewardship (b) the efficient use and development of natural and physical resources:                      (ba) the efficiency of the end use of energy:                      © the maintenance and enhancement of amenity values:(d) intrinsic values of ecosystems:                      (f) maintenance and enhancement of the quality of the environment: (g) any finite characteristics of natural and physical resources: (h) the protection of the habitat of trout and salmon: (i) the effects of climate change:                      The iwi depictions of te mana o te wai following the tenets of section 8 of the Resource Management Act or the Treaty of Waitangi section where it states:                      In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</p>	
<p><b>S170 Te Rūnanga o Toa Rangatira</b></p>	<p>S170.014</p>	<p>General comments - overall</p>	<p>Support</p>	<p>Objective 11 could be worded to express a stronger behavioral direction to say: the quantity of waste disposed of is reduced to ultimately remove our reliance on landfills.</p>	<p>Objective 11 could be worded to express a stronger behavioral direction to say: the quantity of waste disposed of is reduced to ultimately remove our reliance on landfills.</p>
<p><b>S170 Te Rūnanga o Toa Rangatira</b></p>	<p>S170.018</p>	<p>General comments - overall</p>	<p>Support in part</p>	<p>Objective 29A                       It is encouraging to see an objective that is aiming to increase the resilience of the land. The policies</p>	<p>Objective 29A                      It is encouraging to see an objective that is aiming to increase the resilience of the land. The policies to implement this objective seems to be limited to forest cover and extent.</p>

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				to implement this objective seems to be limited to forest cover and extent. Was there any deliberation of using District Plan and land use controls to strengthen the tools that are available to us increasing land resilience, not just a regional policy. Another consideration is the negative impacts of development on the decrease of resilience, how does the RPS address that?	Was there any deliberation of using District Plan and land use controls to strengthen the tools that are available to us increasing land resilience, not just a regional policy. Another consideration is the negative impacts of development on the decrease of resilience, how does the RPS address that?
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.019	General comments - overall	Oppose in part	Objective 31  The wording of Objective 31 can be strengthened to mean: the demand for mineral resources is met from resources located in close proximity to the areas of demand - in an appropriate way we can reduce its footprint. The Objective should not encourage further mining, and the wording could somewhat contain the need of mining and its footprint. This objective should not read to encourage mining activities further.	Objective 31 The wording of Objective 31 can be strengthened to mean: the demand for mineral resources is met from resources located in close proximity to the areas of demand - in an appropriate way we can reduce its footprint. The Objective should not encourage further mining, and the wording could somewhat contain the need of mining and its footprint. This objective should not read to encourage mining activities further.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.046	General comments - overall	Not Stated / Neutral	Historic Heritage Policy 21 and Policy 22:  We are unsure whether Policy 21 and 22 make a distinguished note between the historic heritage and Sites and Areas of Significance to Māori (SASM) identification and mapping and protection. They should be separated - or the policy 21 and 22 to be worded to ensure that distinguishing features are identified and comes across in the paragraph.	Distinguish between the historic heritage and Sites and Areas of Significance to Māori (SASM) identification and mapping and protection. Seperate or ensure that distinguishing features are identified.
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.056	General comments - overall	Not Stated / Neutral	Policy 49 Recognising and providing for matters of significance to tangata whenua - consideration  It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous	Require mana whenua roles and values to be given consideration in consent applications. All taonga need to be linked to a kaitiaki monitoring framework. Replace the word 'recognised' with stronger policy direction. We suggest removing this wording and leave it with providing for.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				biodiversity but not other parts of the Plan. Policy 49, in a way, explains it to extend the policy intention to fresh and coastal waters in the clause (b) and the exercise of kaitiakitanga in the clause (a) however this comes through as fragmented. The word 'recognised' can be strengthened, we suggest removing this wording and leave it with providing for.	
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.057	General comments - overall	Not Stated / Neutral	Policy 48 Principles of the Treaty of Waitangi provides a generic explanation what the applicants need to provide and what the consideration would be from the perspective of resource consent issuer. Deed of Settlement Acts should be clause (c) and any other evidence that are provided such as, Cultural Impact Assessments and iwi environmental management plans.	Clause (c) should refer to Deed of Settlement Acts. Other relief sought unclear without the context of the relevant provision (see notes below).
<b>S170 Te Rūnanga o Toa Rangatira</b>	S170.081	General comments - overall	Not Stated / Neutral	It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous biodiversity but not other parts of the Plan.	There should be a framework for giving effect to mana whenua roles and values for all topics, not just indigenous biodiversity.
<b>S30 Porirua City Council</b>	S30.0114	General comments - overall	Not Stated / Neutral	Poor drafting of provisions and a lack of supporting evaluation makes it difficult to assess what many provisions will mean for Council.  RPS provisions, including definitions, are not drafted with sufficient rigour and clarity so that they can efficiently and effectively be implemented in regulatory frameworks, namely district and regional plans. These provisions should not require high levels of interpretation, and there is a risk of inconsistent or incoherent implementation across the region as currently drafted.  They must also be drafted using the National Planning Standards so that they can meaningfully be implemented by territorial authorities who have	Council considers that the provisions need a major overhaul and redrafting.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				implemented the National Planning Standards within their district plans.	
<b>S30 Porirua City Council</b>	S30.0115	General comments - overall	Oppose	We have generally been unable to undertake redrafting as part of our submission due to the scale of redrafting required and the limited time available. In some cases, we are unclear as to the policy intent and in those circumstances, we have not been able to request any changes until we fully understand that intent. The exception is Objective 22, Policy 30 and Policy 31 of which we have requested redrafted versions.	We request that GWRC immediately commence a variation to Proposed Change 1, and meaningfully engage and work with the territorial authorities on the redrafting of the provisions. Doing so will avoid litigation through appeals and subsequent plan and consent processes.
<b>S30 Porirua City Council</b>	S30.0116	General comments - overall	Not Stated / Neutral	The real value of regional policy statements is to provide policy direction that either does not exist at a national level or exists at a national level but needs to be articulated at a regional level. Council is concerned about the many provisions in Proposed Change 1 that either duplicate or are inconsistent with matters now comprehensively addressed by national direction. In some instances, they duplicate national direction without giving specific guidance in a Wellington Region context.	Greater alignment with National Direction
<b>S30 Porirua City Council</b>	S30.0117	General comments - overall	Not Stated / Neutral	Council has concerns over jurisdictional issues, particularly in relation to the discharge of contaminants to air, land and water; and the management of fresh waterbodies. We consider that various provisions are ultra vires in terms of our respective functions under sections 30 and 31 of the RMA.  Further, territorial authorities do not have the capacity or capability to undertake these functions. Many of the provisions as required would require a transfer of powers from regional councils to territorial authorities.	Query in relation to s30 and s31 functions, RMA, 1991
<b>S30 Porirua City Council</b>	S30.0118	General comments - overall	Not Stated / Neutral	Proposed Change 1 introduces new requirements where there is no capacity or capability in terms of what is required. Examples of these include whole of life carbon assessment and the requirement for territorial authorities to assess the potential discharge of contaminants against desired attribute states of water. Not to mention the fact	Significant guidance and implementation support would be needed before some provisions can be implemented.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				that contaminant limits are yet to be set through a plan change to the Natural Resource Plan. Even if this capacity and capability existed, there is a lack of policy direction on some concepts, for example the offsetting of greenhouse gas emissions.	
<b>S30 Porirua City Council</b>	S30.0119	General comments - overall	Not Stated / Neutral	Proposed Change 1 will require that all councils in the region undertake significant plan reviews by 30 June 2025 at a time where there are a number of other nationally-driven requirements including: <ul style="list-style-type: none"> <li>• Variations/plan changes to give effect to the recent RMA amendments and the National Policy Statement for Urban Development</li> <li>• Upcoming plan changes that will be required by the National Policy Statement for Indigenous Biodiversity, National Policy Statement for Highly Productive Soils, and the Regional Future Development Strategy; and</li> <li>• Government led reform of the resource management system, three waters reform, and the local government review.</li> </ul> For Porirua City Council this will be on top of our existing full District Plan Review which is in the middle of its hearings stage.	Council seeks that more thought be given to how these various overlapping processes align, and the implications of a significant change to regional policy at this time.
<b>S30 Porirua City Council</b>	S30.0120	General comments - overall	Not Stated / Neutral	Not stated	In addition to the relief sought as set out in our submission, as outlined above Council considers that the <ul style="list-style-type: none"> <li>• best course of action would be to withdraw much of Proposed Change 1, or otherwise work with councils on a variation to significantly amend most of its contents.</li> </ul>
<b>S30 Porirua City Council</b>	S30.0121	General comments - overall	Oppose in part	The drafting of many provisions shows a failure to understand the role of the RPS in an RMA framework, and failure to properly identify a range of tools and levers outside of RMA plans that are needed to deliver the outcomes set out in the objectives. For example, Proposed Change 1 contains some very ambitious objectives, such as a 50% reduction in greenhouse gas emissions from 2019 levels, and net-zero emissions by 2050. However, the policies in the RPS cannot and will not achieve these objectives. For example, there are insufficient levers at a regional/local level to	The objectives collectively need to be reviewed to ensure they are both achievable and realistic.

SUBMISSION POINTS BY PLAN CHAPTER – General comments

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				reduce emissions from the existing vehicle fleet to the extent needed to meet these goals. Further, district plans can only address future use, development and subdivision and cannot require change to existing use or development.	
<b>S30 Porirua City Council</b>	S30.0122	General comments - overall	Not Stated / Neutral	Council considers that there is a lack of an evidence base to support the approach taken to most topics in Proposed Change 1. The Section 32 evaluation report does not adequately assess the approach, nor assess costs and benefits .	Not stated