SOUTH WAIRARAPA DISTRICT COUNCIL
Kia Reretahi Tātau

12/10/2022

Greater Wellington Regional Council
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By email: regionalplan@gw.govt.nz

Tēnā koutou

SOUTH WAIRARAPA DISTRICT COUNCIL SUBMISSION ON PLAN CHANGE 1 TO THE GREATER WELLINGTON REGIONAL POLICY STATEMENT

Introduction

1. The South Wairarapa District Council (SWDC) welcomes the opportunity to submit feedback on plan Change 1 to the Regional Policy Statement (RPS PC1).

About South Wairarapa District Council

2. SWDC is a small council with a population of around 11,700. The district encompasses the three rural towns of Featherston, Greytown and Martinborough. We also have a vast area of rural hinterland home to many small communities, edged by the Remutaka and Tararua Ranges and cradled by 124 kms of rugged coastlines. Our vision is 'the best of country living with the community at the heart of everything we do' and we are working hard to achieve this.

3. The purpose of council is to enable democratic local decision-making and action by, and on behalf of, communities and to promote the social, economic, environmental and cultural well-being of communities in the present and for the future.

General Position

4. SWDC supports the following aspects of the proposal:

    - Provision of a level of clarity around the intentions of the Greater Wellington Regional Council in terms of climate change, freshwater, urban development and indigenous biodiversity

5. SWDC has the following concerns around the proposal:

    - The decision to require greater reductions of greenhouse emissions at a faster pace than government policy without robust economic analysis;
    - The application of NPS UD requirements to SWDC;
    - Directions for offsetting/reducing greenhouse gasses and establishment of permanent forests (carbon farming) and their disproportionate impact on rural areas and communities;

- The effectiveness of required considerations for minimisation of carbon from new transport infrastructure;
- A lack of clarity around some outcomes in the management of natural hazards;
- The lack of TA and stakeholder engagement required for a number of methods;
- The adequacy of the assessment of costs and benefits pursuant to section 32 of the Resource Management Act;
- Concerns over affordability particularly for:
    - Enabling unanticipated growth
    - Review and assessment of SNA's

6. SWDC supports much of the aspirations of the changes to the RPS as part of this plan change. However, the implementation is problematic in parts. SWDC considers the following aspects could be improved:

    - A more substantial economic assessment which identifies where the costs and benefits of the proposals lay, particularly where these exceed Government set targets.
    - Providing a more SWDC appropriate framework for managing urban growth;
    - Clarity on the applicability of the Freshwater Planning Process.

Recommendations

7. SWDC supports the proposal in part and opposes them in part, and has the following recommendations:

    - The matters outlined in this submission and summarised in 5 above are appropriately and robustly assessed.
    - At this time SWDC also notes the matters of the National Policy Standard for Highly Productive Soils (NPS HPS) has been released. We request that this not be incorporated by way of submission and that time is spent to implement the requirements in a way that is thoughtful and robust.

Concluding Remarks

8. SWDC is pleased to submit in support on some of the proposals, but must also oppose others where this will have a significant negative impact on its diverse communities.

9. SWDC wishes to be heard in support of this submission.

Ngā mihi,

[redacted]

Harry Wilson
Chief Executive Officer

§Where text is proposed by PC1 and additional text is to be added these will she shown as <u>double underlined</u>

Where text is proposed to be deleted these will be shown as ~~strikethrough~~

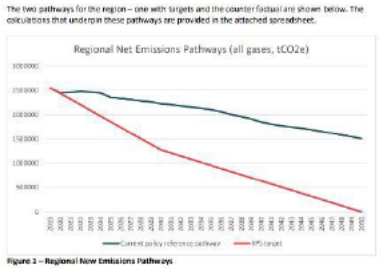
Provision	***Support/Oppose***	***Decision Sought***	***Reasons***
Objectives/Preamble			
Climate Change			
Objective CC1	Support in part	*<u>By 2050, the Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</u>* *<u>(a) sustainable air, land, freshwater, and coastal management,</u>* *<u>(b) well-functioning urban environments and rural areas, and</u>* *<u>(c) well-planned infrastructure.</u>*	A full and complete assessment of costs and benefits should be provided. A more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where: a. Reductions required by this policy is in excess of government policy; and, b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and, c. Impacts go beyond only the economic impact of carbon pricing; and, d. Considers the implied requirement to supplant farming activities with carbon sequestration.
Objective CC.2	Support in part	Further amendments to the objective are required to ensure that the burden of transitioning to a low emission does	The Objective is generally supported. However, it is not sufficiently robust enough to ensure that rural

Provision	Support/Oppose	Decision Sought	Reasons
		not disproportionately fall on rural communities disproportionately, that reduction is preferred to mitigation, and mitigation should occur within the environment they arise as a first preference. Including the following amendments to OCC.2: *The costs and benefits of transitioning to a low-emission and climate-resilient region are shared fairly and equitably across the region over time, and in order to achieve social, cultural and economic well-being across our communities:* *(a) reduction is preferred over mitigation and;* *(b) that mitigation occurs as close to the source as possible.* Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	environments, communities, and economies are protected from inequitable allocation of the costs of avoiding, remedying or mitigating the effects of climate change. Any transition policies will need to create realistic and affordable alternatives for these groups (and) transition needs to recognise that options that are realistic for urban dwellers are not necessarily so for rural dwellers. A more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where: a. Reductions required by this policy is in excess of government policy; and, b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and, c. Impacts go beyond only the economic impact of carbon pricing; and, d. Considers the implied requirement to supplant

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			farming activities with carbon sequestration.
Objective CC.3	Support in part Oppose in part	*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:* *(a) By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels, including a:* *(i) 35 percent reduction from 2018 levels in land transport generated greenhouse gas emissions, and* *(ii) 40 percent increase in active travel and public transport mode share from 2018 levels, and* *(iii) 60 percent reduction in public transport emissions, from 2018 levels, and* *(b) By 2050, to achieve net zero emissions.*	Quantification of suitable goals for reduction of climate emissions is supported. However, a more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where: a. Reductions required by this policy is in excess of government policy; and, b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and, c. Impacts go beyond only the economic impact of carbon pricing; and, Considers the implied requirement to supplant farming activities with carbon sequestration. It is unclear how the objective can possibly be achieved by the agricultural sector without substantial afforestation. Where this is the effect of the Objective this should be deleted.

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			It is unclear how the quantum set are to be interpreted and applied. Very little can be done roads are walkable, appropriate for cycling, transport heavy to Martinborough as tourism and not viable public transport The objective targets net emissions. The Wellington Region Greenhouse Gas Inventory does not provide net emissions by sector; however, it does estimate net emissions by district. The results show[1]: • Wairarapa accounts for 14% • Kapiti accounts for 11% • The urban whaitua (Wellington, Hutt, Porirua) account for 75% of net regional emissions To the extent that Council seek to set targets for net emissions by sector, it will be important to estimate net emissions for each sector, ie, both emissions and sequestration. Specifically: to give proper effect to this policy, Council would need to estimate the sum of farm emissions in the region plus the sum of farm sequestration in the region, to arrive at a net figure,

[1] GWRC, 18 May 2020, Wellington Region Greenhouse Gas Inventory

Provision	Support/Oppose	Decision Sought	Reasons
			against which progress can be tracked. If Council has that estimate available, it should be tabled Objective CC.3 intends to be more "challenging' and "cut deeper" than the national targets set in the Zero Carbon Act. The following graph illustrates the difference (the red line is the proposed RPS target)[2]:  Figure 1 – Regional New Emissions Pathways The difference is dramatic, begging the question as to costs and achievability:
Objective CC.4	Support in part, oppose in part	No changes required if amendments to CC.2 are accepted. If relief is not accepted then the following amendments are sought: *The equitable use of ~~N~~nature-based solutions an integral part of climate change mitigation and adaptation, improving the health and resilience of*	The definition 'nature-based solutions' has a wide scope and will include afforestation. The particular concern from South Wairarapa about these tools is that some of them will be used disproportionately in the Wairarapa sub-region, namely carbon farming. This has the potential to displace the significant economic drivers of our

2 https://www.gw.govt.nz/assets/Documents/2022/08/Evaluation-of-the-preferred-regional-greenhouse-gas-target-August-2022-with-calculations-attached.pdf

Provision	Support/Oppose	Decision Sought	Reasons
		people, biodiversity, and the natural environment Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	communities and then the social infrastructure and communities themselves. As noted in our submission on CC.2, it is fair to require reductions and mitigations to occur 'at source' in the first instance.
Objective CC.5	Support in part, oppose in part	No changes required if amendments to CC.2 are accepted. If relief is not accepted, then the following amendments are sought: *By 2030, there is an increase in the area of permanent forest in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic wellbeing where:* a. *emissions are not able to be first reduced and;* b. *afforestation is proportionate in extent to the remaining greenhouse emissions required after reduction; and* c. *all environments contribute to natural sequestration of carbon.*	The particular concern from South Wairarapa is that afforestation will be used disproportionately in the Wairarapa sub-region. This has the potential to displace the significant economic drivers of our communities and then the social infrastructure and communities themselves. As noted in our submission on CC.2, it is fair to require reductions and mitigations to occur 'at source' in the first instance. The objective does not provide enough clarity to adequately demonstrate that.

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
		Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	
Objective CC.6	Support	Including the following amendments to CC.6: *Resource management and adaptation planning increase the resilience of communities and the natural environment to in the short, medium, and long-term effects of climate change and natural hazards*. Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	A long-term view is required to build in resilience to natural hazards generally as well as those exacerbated by climate change. Support the development of a multitude of regulatory and non-regulatory methods
Objective CC.7	Support	Retain as notified. Include additional policies and methods to promote the development and wider public dissemination of information outlining the effects of natural hazards and climate change.	This objective is supported, but requires more support beyond policy CC.15, CC.16, and methods CC1 and CC8. These alone will not be sufficient to meet the objective's aspirations in actively participating in mitigation and adaptation responses.
Freshwater			
Objective 12	Support in part	Retain as notified.	The prioritisation of the health needs of people are supported. More work

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			needs to be done to improve efficiency of use when GWRC makes decisions allocating takes of water. Any changes in allocation requirements for municipal supplies should be phased in over the length of the approval.
Indigenous ecosystems			
Objective 16	Support in part	Amend Objective 16 as follows: *Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are ~~maintained~~ protected, and over time enhanced, and restored to a healthy functioning state.* Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought, unless the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.	Measures to protect biodiversity can be applied in the short term, or are already included in Council's regulatory documents. SWDC has protected Significant Natural Areas as part of the Combined Wairarapa District Plan for over 10 years. This is proposed to continue. However, the Objective should more appropriately reflect that it will take time to return ecosystems and habitats to a healthy functioning state. It is acknowledged that the often-promised National Policy Statement for Indigenous Biodiversity has not yet materialised. However, on the face of the provisions many of the matters within previous exposure drafts have been incorporated. The process managing the changes to the RPS needs to be alive if the proposed NPS does occur.

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
Objection 16A	Support in part	Retain as notified if relief is granted as requested for Objective 16. If not, amend as follows: *The region's indigenous ecosystems are maintained, enhanced, and restored over time to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.* Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought, unless the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.	Measures to protect biodiversity can be applied in the short term, or are already included in Council's regulatory documents. SWDC has protected Significant Natural Areas as part of the Combined Wairarapa District Plan for over 10 years. This is proposed to continue. However, the objective should more appropriately reflect that it will take time to return ecosystems and habitats to a healthy functioning state. It is acknowledged that the often-promised National Policy Statement for Indigenous Biodiversity has not yet materialised. However, on the face of the provisions many of the matters within previous exposure drafts have been incorporated. The process managing the changes to the RPS needs to be alive if the proposed NPS does occur.
Objective 16B	Support in part	If the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.	It is acknowledged that the often-promised National Policy Statement for Indigenous Biodiversity has not yet materialised. However, on the face of the provisions many of the matters within previous exposure drafts have been incorporated. The process managing the changes to the RPS needs

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			to be alive if the proposed NPS does occur.
Objective 16C -	Support in part	Retain as notified If the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing at which point we request that GWRC consider an appropriate process to align policy approaches.	Where additional materials intended to be used for regulatory and non-regulatory processes are developed is appropriate and necessary that all stakeholders are included.
Natural hazards			
3.8 Regionally significant issue 3	Support in part	Amend to reflect that not all natural hazard events are impacted by the effects of climate change.	Not all natural hazard events, such as seismic or tsunami will increase either the likelihood or consequences as a result of climate change.
Objective 19	Support in part	Retain as notified *AND;* Include additional objectives and policies that give direction as to when mitigation and adaptation should be considered and the outcomes sought by that mitigation and adaptation. AND; Any consequential amendments to give effect to the relief sought.	The Objective is particularly high level and would benefit from some nuance, addressing how new and existing risk and development are treated. This will become more relevant as the effects of climate change increase in severity and frequency and sea level rise.
Objective 20	Support in part	Retain as notified *AND;*	This objective is supported. However, the framework for natural hazards overall does not give sufficient guidance for when intervention including

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		Include additional objectives and policies that give direction as to when mitigation and adaptation should be considered or required. AND; Any consequential amendments to give effect to the relief sought.	mitigation, adaptation should be considered, including managed retreat. This is important to ensure at development and hazard management level (for example flood management) there are clear expectations around roles responsibilities.
Objective 21	Support in part	Retain as notified *AND;* Include additional objectives and policies that give direction as to when mitigation and adaptation should be considered or required. AND; Any consequential amendments to give effect to the relief sought.	This objective is supported. However, the framework for natural hazards overall does not give sufficient guidance for when intervention including mitigation, adaptation should be considered, including managed retreat. This is important to ensure at development and hazard management level (for example flood management) there are clear expectations around roles responsibilities.
Regional form, design and function			
Objective 22 Urban areas res, com and mixed use zones Urb env UD	Support in part, oppose in part	Amend Objective 22 as follows: *Urban development, including housing and infrastructure in tier 1, 2 and 3 urban authorities is enabled where it demonstrates the characteristics and qualities of well functioning urban environments, which:*	The objective is not clear as to how it applies to development not intended to be managed by the National Policy Statement for Urban Development (NPS UD). SWDC had previously requested direction to be able to consider these

Provision	Support/Oppose	Decision Sought	Reasons
		(a) Are compact and well designed; and *(b) Provide for sufficient development capacity to meet the needs of current and future generations; and* *(c) Improve the overall health, well-being and quality of life of the people of the region; and* *(d) Prioritise the protection and enhancement of the quality and quantity of freshwater; and* *(e) ~~Achieve~~ the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity can be met; and* *(f) Support the transition to a low-emission and climate-resilient region; and* *(g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and* *(h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and) Support the competitive operation of land and development markets in ways that*	matters, but not its direct application for all of them. It is noted that the residential, commercial and mixed use zones of all district are considered 'urban areas' in the definitions included for this plan change. Urban development, the point of the Objective, would include development in those zones or of that type in the SWDC jurisdiction. Competitive land markets The policy appears to attempt to implement 3.8 of the NPS UD. The NPS UD specifically identifies those areas for which it is to which it is to apply. South Wairarapa District is not one of those areas. It is of concern that any and all urban development that meets the characteristics set out in (a) to (k) is required to be enabled. For small Councils with critical infrastructure issues and not required to provide urban land under the NPS UD in the same way. The proposed amendments will more likely lead to poor outcomes where planned

Provision	Support/Oppose	Decision Sought	Reasons
		improve housing affordability, including enabling intensification; and (j) Provide for commercial and industrial development in appropriate locations, including employment close to where people live; and i) Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and (k) Are well connected through multi-modal (private vehicles, public transport, walking, micromobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space. *For other territorial authorities, urban development, including housing and infrastructure are provided for where (a) to (i) and (k) are met and where it is identified as part of long term growth planning documents adopted by that Council.* Or, similar relief to the same effect; AND;	development may be precluded in favour of unplanned development with significant long term infrastructure effects. This could be considered counter-intuitive given that some of the settlements in the SWDC jurisdiction are some of the highest housing costs in New Zealand, including Greytown which was recently identified as the second most behind only Queenstown. Our preference is that a more nuanced policy is provided that allows Council to better provide for development and where planned development is not undermined. Please provide an assessment of the costs and benefits on SWDC of applying the NPS UD in a manner over and above its statutory purpose. This should include affordability of rates for new and upgraded infrastructure and the cost of unanticipated development that meets the objective. It is unclear why the whole objective must go through the Freshwater Planning process.

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
		Any consequential amendments to give effect to the relief sought. *And;* Separate out matters in the objective that are required to go through the Freshwater Planning Process from those that need not.	
Objective 22B	Oppose	Delete objective 22B And; Consult with rural communities to develop a more comprehensive, strategic and meaningful set of objectives and policies for the rural environment and introduce them by way of variation to this plan change.	The objective is so broad that it is meaningless. Further, the type of development in the rural area is that is most often not strategic in nature. The purpose of this objective is unclear, particularly when viewed against the relevant policies, and methods which are largely non-regulatory and related to water attenuation, other parts of the RPS which are already adequately covered, or thinking about matters in the future. GWRC needs to clearly identify what it is seeking to manage and why. This objective does not and can not meet any requirement of s.32 of the RMA.
Policies			
Policy CC.1	Support in part	Amend Policy CC.1 as follows: *District and regional plans shall include objectives, policies, rules and/or methods to require that all new and altered transport infrastructure is*	It is unclear as to the degree of change that can be undertaken by the South Wairarapa District in particular that; a. The towns of the South Wairarapa are largely 'walkable'

Provision	Support/Oppose	Decision Sought	Reasons
		designed, constructed, and operated in a way that contribute to reducing greenhouse gas emissions by: *(a) Optimising overall transport demand;* *(b) Maximising mode shift from private vehicles to public transport or active modes; and* *(c) Supporting the move towards low and zero-carbon modes.* AND; Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	and 'cyclable' already for those who are able bodied; b. Very little regional funding for public transport is provided to the South Wairarapa; c. It is unclear how the large network of rural transport infrastructure in the rural environment can be amended to achieve the outcomes sought; d. There are limited or no alternatives provided for agricultural and forestry transport in the near future; e. Assumes alternatives are available for those who are aged, have limited mobility, have fixed/low incomes. Managing in this manner may be piecemeal and lead to sub-optimal outcomes. More strategic network wide assessments need to be undertaken and priorities set that was rather than imposing change on an ad-hoc basis. While the intent of this policy is supported, applying the requirements in (a)-(c) to all new and altered transport infrastructure does not allow

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			for the scale or type of the alterations to be considered. For example, an alteration to transport infrastructure could comprise a new roundabout, or creation of a heavy vehicle bypass – there are many types of alterations where consideration of these matters would not be appropriate, either because the alteration is minor in nature, or because it provides greater efficiency for the wider transport network – but not necessarily for zero- or low-carbon modes. While there might be flow-on effects (e.g. a heavy vehicle bypass might make other urban streets more attractive for active modes), these would not necessarily meet the criteria in (b) and (c).
Policy CC.2	Support in part	Amend Policy CC. 2 as follows: *By 30 June 2025, ~~district plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold~~*	Managing in the manner proposed in CC2 would be piecemeal and lead to sub-optimal outcomes. More strategic network wide assessments need to be undertaken and priorities set that was rather than imposing change on an ad-hoc basis. More specific implementable options taking a network wide perspective provide clearer outcomes and provide more certainty for developers.

Provision	Support/Oppose	Decision Sought	Reasons
		~~*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.*~~ *, regional and subregional transport strategies are developed and adopted that set out network wide, mode and location specific strategic development actions and requirements for all new subdivision, use and development to:* *(a) Identify appropriate thresholds for require travel demand management plan to give effect to this policy; and* *(b) minimise reliance on private vehicles, and;* *(c) maximise use of public transport and active modes, and;* *(d) avoid more than minor increases in greenhouse gas emissions, and;* *(e) require district plans are amended to include objectives, policies and rules that require subdivision, use and development consent applicants to implement the*	It is unclear how the large network of rural transport infrastructure in the rural environment can be amended to achieve the outcomes sought. It is unclear on a regional scale what a 'more than minor' increase would be. The objective requires the support of an amended and detailed transport network assessment and strategy that sets out realistic, specific and specific implementable options for applicants to incorporate into their development.

Provision	Support/Oppose	Decision Sought	Reasons
		requirements in (a) to (d) above.	
Policy CC.3	Support in part	Amend Policy CC.3 to include regional plans.	The use of the policy to enable infrastructure is supported. It is unclear why this requirement does not extend to regional plans as substantial changes to transport infrastructure is likely to require a multitude of resource consent approvals.
Policy CC.4	Oppose in part	Amend Policy CC4 so that matters in CC.14(a) and (d) are directly referenced in the policy so that they need not be repeated in CC.14 and are within the scope of a schedule 1 hearing process. *District and regional plans shall include policies, rules and/or non-regulatory methods to provide for climate-resilient urban areas by providing for actions and initiatives ~~described in Policy CC.14~~ which support delivering the characteristics and qualities of well-functioning urban environments including:* *(a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree*	The purpose of the policy is unclear. The policy refers to matters that are included for a Freshwater Planning Process, but is not of itself considered part of it. This is confusing and will complicate the hearing process. It is arguable that parts of CC.14 do not either directly or indirectly relate to freshwater matters contained in the NSP FM and therefore should be open to the standard schedule 1 process. While noting TA's functions in s.31 (b)(i), construction standards of buildings is a matter appropriately and adequately managed by the Building Act.

Provision	Support/Oppose	Decision Sought	Reasons
		canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050, *(b) the application of water sensitive urban design principles to integrate natural water systems into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality* *(c) protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural hazards and the effects of climate change* Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	
Policy CC.5	Support in part, oppose in part	Delete Policy CC.5, OR Amend Policy CC.5 as follows: *Regional plans shall include objectives, policies, rules and/or methods ~~to avoid~~ that manage changes to land use activities and/or management practices that result in an increase, in gross greenhouse gas emissions from agriculture in order to meet the targets set out in Objective CC.3.*	Council recognises that equitable reductions of greenhouse emissions are required. The Wairarapa must play its part, as does the agricultural sector. However, the use of 'avoid' is unnecessary and could limit policy options when developing provisions at regional plan level. It is also unclear which only agriculture is targeted to 'avoid' increases, particularly as the emissions from the sector are generally reducing and only a small proportion of

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
		Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	overall emissions. In respect of net emissions, the regional inventory shows that[3]: • Wairarapa accounts for 14% • Kapiti accounts for 11% • The urban whaitua (Wellington, Hutt, Porirua) account for 75% of net regional emissions The policy doesn't reflect the diverse and temporally variable nature of farming systems and could create a 'sinking lid' for farming in the Wairarapa Sub-Region. While no methods are included, and the policy applies to regional plans only, this policy appears to set the initial framework for RMA plans targeting agricultural emissions. SWDC is concerned with the implications of this, and with the interaction or conflict it might have with other agricultural emission reduction measures. SWDC DC wishes to understand how this reduction aligns with Government policy in the area. It is unclear how fair and reasonable reductions should be calculated and consistently applied in consenting.

[3] GWRC, 18 May 2020, Wellington Region Greenhouse Gas Inventory

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			A more fulsome assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where: a. Reductions required by this policy is in excess of government policy; and, b. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and, c. Impacts go beyond only the economic impact of carbon pricing; and, d. Considers the costs of the implied requirement to supplant farming activities with carbon sequestration. •
Policy CC.6	Oppose in part	Either delete Policy CC.6, or Amend Policy CC.6 as follows: *Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of permanent forest in the region to contribute to achieving net-zero*	A more fulsome assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where: a. Reductions required by this policy is in excess of government policy; and, b. That adequately assessed the impact on the social, economic

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		greenhouse gas emissions by 2050, while: *(a) promoting and incentivising the planting or regeneration of permanent indigenous forest over exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached, and* *(b) avoiding plantation forestry on highly erodible land, particularly in catchments where water quality targets for sediment are not reached and* *(c) not enabling afforestation of permeant forest for the purposed of offsetting emissions from outside of the environment they are located* *(d) ensuring that any offsets are proportionate and only considered after avoidance or reductions at source have been maximised.* Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	and cultural aspects of those costs on communities; and, c. Goes beyond the economic impact of carbon pricing; and, d. Considers the cost of the implied requirement to supplant farming activities with carbon sequestration. The proposed approach facilitates the complete afforestation of all rural business land in the district. There is insufficient analysis of costs and benefits, particularly in the long term to the region and the South Wairarapa District. This is evident by a lack on limitations proposed. Offsetting of greenhouse gas has limitations, particularly where no controls have been put in place at source. SWDC does have concerns that the Wairarapa will be expected to provide a greater proportion of permanent forest cover than other areas because it has larger areas of rural land. When the driver for increased afforestation is achieving net zero carbon emissions, it appears inequitable that the Wairarapa might suffer from greater afforestation

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			when there is a lack of emission reduction in other areas.
Policy CC.7	Support in part	Retain as notified Include a non-regulatory method to develop guidance material for the application of nature based solutions included in infrastructure and development.	The policy intent is supported, there should be a corresponding non-regulatory method to develop guidance to integrate these solutions in infrastructure and development design options and assess when these solutions are and are not appropriate.
CC.8	Support	Retain as notified	The policy limits the need to offset costs onto rural communities in the region. Council recognises the relationship with policy CC6, and that they should be read together. However, CC.6 requires further clarification regarding proportionality and location of offsets. As such, the amendments proposed by SWDC need to remain alongside CC.8.
Policy 7	Support in part, oppose in part	Amend the explanation so that it is clear what is meant by 'low and zero carbon regionally significant infrastructure'; or alternatively, remove the proposed additions to (a). Amend (a)(i) as follows: *(i) people and goods can travel to, from and around the region efficiently and safely <u>and in ways that support</u>*	Retain as notified While SWDC supports the intent of this provision, the references to 'low or zero carbon' activities do not make sense here, and there are other terms that can more effectively convey the requirements of this policy. It is unclear what 'low and zero carbon regionally significant infrastructure'

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
		transitioning to public transport, active transport or ~~low or zero carbon~~ multi modal travel modes; Amend (a)(iii) as follows: (iii) people have access to energy, and preferably renewable ~~low or zero carbon~~ energy, so as to meet their needs; and Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	might include, and how this might be assessed. Replacing 'Low or zero carbon energy' with 'renewable energy' provides greater clarity (noting that the vast majority of residents access their energy from the National Grid or non-local sources of gas and therefore this clause has limited effect).
Policy 11	Support in part	Amend Policy 11 to align with the definition of small and community scale in the National Policy Statement for Renewable Energy Generation (NPS REG).	The draft South Wairarapa District Plan will align with the language in the NPS. It is unclear why the RPS sets the standard that they do.
Policy 14	Support in part	Retain as notified Include method that develops non-regulatory guidance on good practice to achieve the policy.	This policy is generally supported in that the matters contained within it are best managed or directed by a Regional Authority and their functions under s.30 of the RMA. Similarly, the roles of TA's, including as owners and operators of infrastructure, ensures that the matters can be addressed as conditions

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			attached to consents, particularly for stormwater. Council does have concerns that any required planting for open water races in an urban setting would preclude maintenance and result in overtopping or counterintuitive outcomes for water quality. Council would support the development of good practice guidelines and engineering standards to assist implementation where they are not currently available.
Policy 15	Oppose in part	Remove the requirement in Policy 15 for TA's to manage activities to achieve attribute states.	The policy is written in a manner that holds TA's responsible for meeting freshwater targets and limits in regional plans. this is not the function of Territorial Authorities under s.31 of the RMA to manage the use of land to achieve water quality and quantity attribute states. Similarly, this is not within the scope of 3.5(3) of the NPS which looks to 'promote positive effects' and avoid, remedy, mitigate for general health and wellbeing, not to achieve target and limits. TA's contributions to meeting NPS FM is adequately addressed above in the amended Policy 14 and FW.1 as part of

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			GWRC discharge consent decisions and other regional plan matters. Further, much of the activities requires by the policy is managed by not only the regional plan but also the NES F. Duplication where this is required by both TA's and RC's inefficient and doesn't meet s.32. It is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m^2). SWDC does not have the capacity to undertake an assessment of the matters described in this policy as they do not relate to core territorial authority functions, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks. Policies, rules and methods addressing these matters are more appropriate in a regional plan.
Policy 17	Support	Retain as notified	Support the prominence of the health needs of people.
Policy FW.1	Support in part, oppose in part	Amend Policy FW.1 to replace 'reduce demand' to 'increase efficiency'.	This policy appropriately directs regional plans to undertake demand management directions. However, the

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			policy as written suggests an over reduction in demand from current levels. The s.32 does not outline the need for reduction, nor adequately identifies the costs of the policy, particularly with regard to the significant growth promoted by the plan change and the existing RPS.
Policy FW.2	Support in part	Delete	The policy repeats the matters already more appropriately addressed in FW1.
FW.4	Oppose	Delete	It is unclear why the RPS is in this space. The policy is difficult to read and in parts does not make sense. Similarly, the provision as written may not meet the necessary requirements to be implemented.
Policy 23	Oppose in part	Require the Greater Wellington Regional Council to fund and undertake the necessary work required to comply with the policy.	While the Wairarapa Combined District Plan has contained SNA's for at least 12 years, further assessment and ground truthing is estimated for the South Wairarapa District to cost a minimum of $600,000. This equates to an approximately 3% increase in rates. The last two rating years has seen a 28% increase in rate, largely to provide for improved infrastructure. The work is not funded as part of the LTP and would have to go out for consultation in the 23/24 year and be completed in one financial year. This is unlikely achievavle given that funds would need to be provided, field work undertaken, then

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			plan changes complete in a 12 month period. Other substantial capital costs related to infrastructure are anticipated in that period as well. The requirement is unaffordable to the ratepayers of South Wairarapa in its current form.
Policy 24	Support in part	Retain as notified	Support more clarity on the use of biodiversity offsetting. There is some concern in terms of the requirement of a 'minimum' 10% uplift and whether this meets the requirements of s.108AA when being applied.
Policy 29	Support in part	Retain as notified. Include additional methods to support consistent implementation of risk assessment and provision/communication of natural hazards and associated risks.	The provisions are generally supported when examined alongside policies 51 and 52.
Policy 31	Support in part	Retain (c) as notified.	Support the enabling of greater densities and height for transport oriented growth nodes in (c), including Featherston.
Policy 32	Support	Improve clarity over which activities is intended to be covered by the policy.	There could be improved clarity for matters such as quarries being 'industrial' and critical for growth and therefore included as part of this policy.
Policy CC.9	Support in part	Amend policy CC.9 as follows: *When considering an application for a resource consent, notice of requirement, or a change, variation or*	SWDC supports the approach in principle, but are of the view that this is more achievable by the tier 1 Council's in the region that receive significant investment in public transport. SWDC

Provision	Support/Oppose	Decision Sought	Reasons
		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 where practicable. Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.	still wish to support the approach to a degree that is practicable in its context. However, this may be of a significantly smaller scale than the policy intends. Matters such as the application of good urban design principles for connectivity, walkability and cyclability for able bodied residents and suitable street furniture are the most probable extents that can be applied in our context.
Policy CC.12	Support in part, oppose in part	*Amend Policy CC.12 s follows:* *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 established mitigate the effects of* ~~*to*~~ *climate change and particular regard shall be given to avoiding adverse effects on the climate change mitigation or adaptation functions of that solution.*	The policy needs to provide more certainty around whether it applies to natural features that form part of climate mitigation or those which are created. For example, existing plantation forests, or existing indigenous forest, or artificial wetlands created to mitigate the effects of climate change.

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
		Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought	
Policy CC.13	Oppose	Delete Policy CC.13 And, Establish a policy that: (a) does not result in a sinking lid to agriculture and forces afforestation on rural communities, (b) recognises that some emissions are unavoidable, but also that constant offsetting as a result will remove agricultural uses from the land, (c) local food supply is necessary to reducing greenhouse gas emissions from transport. Or, similar relief to the same effect; AND;	The policy's implementation at 'farm level' will result in a sinking lid on agricultural activities and forcing offsets of permanent forest on rural communities. it is not sufficiently robust enough to protect rural environments, communities, and economies from inequitable allocation of the costs of avoiding, remedying or mitigating the effects of climate change. A more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where: e. Reductions required by this policy is in excess of government policy; and, f. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and,

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
		Any consequential amendments to give effect to the relief sought	g. Impacts go beyond only the economic impact of carbon pricing; and, h. Considers the implied requirement to supplant farming activities with carbon sequestration.
Policy 40	Support in part	Amend Policy 40 to recognise the need for water to support human health. Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought	This is a value that is included in the proposed PC1 framework that is absent in the decision making in Policy 40. This water has significant value ot the community and should also be protected when considering resource consents. Policy FW.5 does not achieve this in its current form.
Policy 41	Oppose in part	Amend policy 41 to clarify that these are for regional consents only.	As noted previously, the matters in this policy directly relate to the functions in s.30(1)((ii) for regional councils.
Policy FW.5	Support in part, oppose in part	Amend Policy FW.5 as follows: *When considering a change, variation or review of a regional or district plan particular regard shall be given to:* *(a) climate change impacts on water supply, including water availability and demand;* *(b) demand from future population projections, growth strategies adopted by Councils, and the ability to deliver well functioning urban environments;*	Policy FW.5 does not assist in resolving the numerous conflicts between resources within this plan change. In particular, the ability to deliver long term affordable growth, while significantly increasing environmental protections. Where growth has been planned in conjunction with the community, mana whenua and other stakeholders, the protection and enabling of municipal water takes, subject to te mana o te wai and a range of 'use management' including

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
		(c) development of future water sources, storage, treatment and reticulation; and *(d) protection of existing and future water sources.* Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought	efficiency measures, should be protected.
Policy 51	Support in part	Amend Policy 51 to remove the inclusion of 'may' in (f). Include a method that develops suitable guidance and methodology for persons assessing residual risk from hazard, particularly those affected by mitigation structures.	Generally SWDC support the improvements to the policy. There is concern regarding (f) in that the inclusion of the word 'may' adds unnecessary uncertainty. This should be deleted. It is critical that an additional method supporting this policy is included to address how residual risk is consistently assessed. This is more important where mitigation structures are proposed. Practical implementation of assessment of residual risk has been problematic without either hazard specific or general guidance.
Policy 52	Support in part, oppose in part	Amend the changes to the footer of Policy 52 to remove the changes to include the word 'minimise' and retain the existing words 'reduce'	Generally support the amendments to the policy. However, the amendments at the foot of the policy which are now to 'minimise' the risk from natural

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			hazards creates greater uncertainty. While SWDC understands the reasoning behind it, when undertaking protection works it is now unclear as to what standard of protection GWRC expects. For example, for flood protection work, does minimise mean for a 1%AEP event (with climate change) or does it mean a 0.1%AEP event (with climate change).
Policy 56	Support	*Amend Policy 56 as follows:* *When considering an application for a resource consent or a change, variation or review of a district plan, in rural areas (as at ~~March 2009~~ August 2022), particular regard shall be given to whether:* *(a) the proposal will result in a loss of productive capability of the rural area, including cumulative impacts that would reduce the potential for food and other primary production excluding land identified in (d) and reverse sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals;* *(b) the proposal will reduce aesthetic and open space values in rural areas between and around settlements;*	The policy is supported, but puts too much weight on (a) over (d). This is reflected in the recently gazetted National Policy Statement for Highly Productive Soils (NPS - HPS). While SWDC seeks amendment here, we do not seek that the NPS HPS is implemented in its entirety in this process, it is particularly relevant to this policy and for growth in our district.

Provision	Support/Oppose	Decision Sought	Reasons
		(c) the proposals location, design or density will minimise demand for nonrenewable energy resources; and *(d) the proposal is consistent with <u>any Future Development Strategy, or</u> the ~~city or district~~ <u>regional or local</u> strategic growth and/or development framework or strategy that addresses future rural development, should the <u>Future Development Strategy be yet to be released</u>; or* *(e) in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity.* **Or, similar relief to the same effect;** **AND;** **Any consequential amendments to give effect to the relief sought**	
Policy 57	Support in part	Amend the policy as follows: *When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, ~~require land use and transport planning within the Wellington Region is integrated in a way which~~ <u>have particular regard to the way in which land use and transport</u>*	CDC supports integrated development in the Eastern Growth corridor – Hutt to Masterton. However, SWDC does not consider that this policy in its proposed form is appropriate in the district outside of Featherston and potentially the proposed Woodside growth area. The public transport network in the Wairarapa is limited, and as a predominantly rural area, there are

Provision	Support/Oppose	Decision Sought	Reasons
		planning is integrated within the Wellington Region, so that it: *(a) supports a safe, reliable, inclusive and efficient transport network;* *(b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity;* *(c) minimises private vehicle travel and trip length, where practical, while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes;* *(d) encourages an increase in the amount of travel made by public transport and active modes;* *(e) provides for well-connected, safe and accessible multi modal transport networks, where practical, while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical;* *(f) supports and enables the growth corridors in the Wellington Region, including:* *(i) Western Growth Corridor – Tawa to Levin;* *(ii) Eastern Growth Corridor – Hutt to Masterton;* *(iii) Let's Get Wellington Moving Growth Corridor.*	practical limits to the way in which public transport can be utilised. While active modes can be encouraged, and the rail network provides a linkage to other towns on the Wairarapa line, the heavy emphasis on public transport networks is not appropriate in the Wairarapa context. SWDC is concerned that the policy requires that land use and transport planning is integrated for new development and would instead support the policy seeking 'particular regard' be given to these matters in Carterton. Requiring this for consent applications for land use and development is also onerous and has the potential to create a significant burden in preparation and processing of consents for relatively small developments. Softening the wording will allow some discretion in when this policy should be considered.

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
		Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought	
Policy 58	Support	Retain as notified	Critical to ensure that environmental infrastructural objectives are met and ensures community affordability.
Method CC.2	Support in part	Amend method CC2 to include the 'in consultation with territorial authorities'.	SWDC has an interest in how these methods are applied as noted in these submissions, and therefore should be included in discussions over appropriate implementation guidance.
Method 34	Support in part	Amend method CC2 to include the 'in consultation with territorial authorities'.	Given the role of territorial authorities in terms of both water supply and land development, and the amended provisions within this plan change to require efficiency, storage and other assessments it is necessary to undertake this work in consultation with TA's.
Method 46	Support	Retain as notified	Support this method to progress the Featherston CDO.
Method CC.4	Support	Retain as notified	This method is a critical part of ensuring that the rural areas of Wairarapa do not become a carbon sink for the rest of the region.
Method 21	Support in part	Retain as notified	The Wairarapa Combined District Plan already identifies and protects SNA's. However, further review and ground

Provision	*Support/Oppose*	*Decision Sought*	*Reasons*
			truthing is estimated to cost approximately $600,000. As noted in our submission above, this equates to an approximate 3% rates increase above the already significant increases SWDC has already set. As above, the timeframe means that this work is current unfunded and would need to go through the LTP cycle. The work would have to be completed in a very short timetable assuming it could be funded. Council wishes to discuss passing this responsibility to GWRC.
Method CC.8	Support in part	Amend the chapeau of Policy CC.8 to include that this method is undertaken in conjunction with stakeholders.	The method is appropriate but it should include partnering with appropriate stakeholders.