

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region

– Raw Further Submissions

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FURTHER SUBMISSION ON PROPOSED CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION

To: Greater Wellington Regional Council
PO Box 11646
Wellington 6142

regionalplan@gw.govt.nz

Name of Submitter: Investore Property Limited

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AUCKLAND 1143
Attention: Bianca Tree / Amy Dresser

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Further Submission on Proposed Change 1

1. Investore Property Limited (**Investore**) appreciates the opportunity to make this further submission on Proposed Change 1 (**PC 1**) to the Regional Policy Statement for the Wellington Region (**RPS**).
2. Investore has an interest in PC 1 that is greater than the interest of the general public. Investore owns the retail site at 91 Johnsonville Road, Johnsonville (on the State Highway 1 side of Johnsonville Road) which is currently tenanted by Countdown, Jesters Pies, Unichem Pharmacy and others. Investore also made a primary submission on PC 1. An overview of this site and Investore's interests in PC 1 is set out in Investore's primary submission.
3. This is a further submission on behalf of Investore to support in part the primary submissions of Wellington City Council (**WCC**) and Kāinga Ora – Homes and Communities (**Kāinga Ora**) on PC 1.

Further Submission

4. Investore supports WCC's submission to the extent that it seeks for Johnsonville to be identified as a sub-regional centre and as one of the 'other regionally significant centres' in the Wellington region.

5. Investore also supports Kāinga Ora's submission to the extent that it seeks Johnsonville to be recognised as a metropolitan centre, as that terminology is consistent with the National Planning Standards, Proposed Wellington City District Plan, and Johnsonville's role as a sub-regional centre. Investore also supports other parts of Kāinga Ora's submission which seek to enable development in Wellington and give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**).
6. The details and specific reasons for Investore's further submission in support of WCC's and Kāinga Ora's submissions on PC 1 is set out in **Appendix A**.

Reasons for Submission

7. In addition to the specific reasons identified in Appendix A, the reasons for Investore's further submission are to ensure that PC 1:
 - (a) will give effect to the objectives and policies of the NPS-UD;
 - (b) will comply with the National Planning Standards;
 - (c) will contribute to well-functioning urban environments;
 - (d) is consistent with the sustainable management of physical resources and the purpose and principles of the Resource Management Act 1991 (**RMA**);
 - (e) will meet the requirements to satisfy the criteria of section 32 of the RMA;
 - (f) will meet the reasonably foreseeable needs of future generations; and
 - (g) is consistent with sound resource management practice.

Relief Sought

8. Investore seeks the relief sought in Appendix A, and such other additional or consequential relief to give effect to the matters raised in this submission.
9. Investore wishes to be heard in support of its submission.

10. If others make a similar submission, Investore will consider presenting a joint case with them at a hearing.

DATED this 19th day of December 2022

Investore Property Limited by its solicitors
and duly authorised agents
MinterEllisonRuddWatts



Bianca Tree / Amy Dresser

Address for service of submitter

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Appendix A – Further submission of Investore Property Limited (**Investore**) on Proposed Change 1 (**PC 1**) to the Wellington Regional Policy Statement (**RPS**)

Submitter	Sub no./ point no.	Support/ oppose	Provision	Reasons for support / opposition	Decision sought
Wellington City Council	S140.052	Support	Policy 30	Investore agrees that Johnsonville should be identified as a regionally significant centre, which would align with the approach taken in the Proposed Wellington City District Plan. This would recognise that the Johnsonville Centre is a hub of retail and commercial activity which supports the economic and social wellbeing of the Wellington community.	Allow
Kāinga Ora – Homes and Communities	S158.010	Support	Objective 20	Investore supports taking a practical approach to climate change risk assessment, including recognising that natural hazard and climate change mitigation and adaptation activities should not increase risks from natural hazards.	Allow
	S158.013	Support	Policy CC.2	It is inappropriate and unnecessary for the RPS to require district plans to require consent applicants to provide travel demand management plans; territorial authorities have the capability to request travel demand management plans when required.	Allow
	S158.21	Support	Policy FW.4	It is inappropriate and unnecessary for the RPS to require district plans to require financial contributions to be paid for stormwater mitigation. The territorial authority should retain discretion to undertake an assessment.	Allow
	S158.026	Support	Policy 30	Johnsonville should also be identified as a metropolitan centre which is consistent with the National Planning Standards, Proposed Wellington City District Plan and its sub-regional status. Investore also supports other submission points which seek consequential amendments to the RPS to reflect Johnsonville being recognised as a Metropolitan Centre.	Allow

Submitter	Sub no./ point no.	Support/ oppose	Provision	Reasons for support / opposition	Decision sought
	S158.027	Support	Policy 31	Investore considers PC 1 does not adequately give effect to the requirements of the NPS-UD and supports providing better direction for where intensification can occur, for example, by amending Policy 31.	Allow

FS2 - Rangitāne o Wairarapa Inc

Address for service: anita@kahuenviro.co.nz

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.1	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.007	Objective 20	Support in part	Rangitāne agree with the submitter that Objective 20 could benefit from further clarification as to the scope and intent.	Allow in part
FS2.10	Horticulture New Zealand	S128.012	Objective 21	Oppose	Rangitāne do not agree that it is necessary to elevate or specify one component of community resilience, while not specifying any other components. This matter could be addressed in supporting text, in the explanation as to what community resilience comprises.	Disallow
FS2.100	Te Tumu Paeroa Office of the Māori Trustee	S102.041	Objective 12	Support in part	Rangitāne support the amendment to Objective 12 proposed by Te Tumu Paeroa that the statements of Te mana o te wai by Rangitāne o Wairarapa and Kahungunu ki Wairarapa are recognised and provided for. However further discussion needs to occur with tangata whenua to determine how best to incorporate these statements into the RPS framework.	Allow in part
FS2.101	Te Tumu Paeroa Office of the Māori Trustee	S102.045	Policy 14: Urban development effects on freshwater and the coastal marine area – regional plans	Support	Rangitāne support the amendment to Objective 14 proposed by Te Tumu Paeroa. Mana whenua should have a role in this process.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.102	Carterton District Council	S25.010	General comments - fresh water	Support in part	Rangitāne o Wairarapa support Carterton District Council's request that better linkages are provided between the Te Mana o te Wai statements and the rest of the RPS. Rangitāne o Wairarapa wishes to partner with GRWC to improve these linkages.	Allow in part
FS2.103	Carterton District Council	S25.035	Policy IM.2: Equity and inclusiveness – consideration	Oppose in part	Rangitāne supports the emphasis on equity and inclusiveness in resource management and decision making of this policy. Land use, development and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of access to resources, quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga. Requiring such considerations in resource management decision making will likely prevent existing inequities being exacerbated, increase intergenerational equity, and improve the overall wellbeing of people and communities. Rangitāne wish to work with GWRC to provide further guidance on the implementation of this policy at the territorial level.	Allow in part
FS2.104	Greater Wellington Regional Council (GWRC)	S137.002	General comments - fresh water	Support in part	Rangitāne support the insertion of the freshwater vision for Te Awarua-o-Porirua into Chapter 3.4 proposed by GWRC provided this is accepted by mana whenua.	Allow in part
FS2.105	Greater Wellington Regional Council (GWRC)	S137.003	General comments - fresh water	Support in part	Rangitāne support the insertion of the freshwater vision for Whaitua te Whanganui-a-Tara into Chapter 3.4 proposed by GWRC provided this is accepted by mana whenua.	Allow in part
FS2.106	Neo Leaf Global	S127.005	Climate change introductory text	Oppose	Rangitāne does not support the removal of the reference "restore" from the introductory text. Restoration is an essential component of enhancing the mauri of indigenous ecosystems.	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.107	Powerco Limited	S134.013	Policy IM.2: Equity and inclusiveness – consideration	Oppose	Rangitāne strongly opposes the deletion of Policy IM.2. Rangitāne supports the emphasis on equity and inclusiveness in resource management and decision making of this policy. Land use, development and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of access to resources, quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga. Requiring such considerations in resource management decision making will assist to prevent existing inequities being exacerbated, increase intergenerational equity, and improve the overall wellbeing of people and communities.	Disallow
FS2.108	Ātiawa ki Whakarongotai Charitable Trust	S131.0138	Method CC.7: Advocating for the use of transport pricing tools	Support in part	Rangitāne support the assertion by Ātiawa and agree that care should be applied when lobbying central government to encourage pricing tools/taxes to ensure these methods do not exacerbate existing inequalities.	Allow in part
FS2.109	DairyNZ	S136.003	Table 4	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow
FS2.109	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.001	Overarching Objective A	Oppose	Rangitāne opposes the amendment proposed by BP Oil, Mobil Oil and Z Energy. This would have the effect of demoting our world view.	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.11	Horticulture New Zealand	S128.013	Regional form, design and function introductory text	Support in part	Rangitāne consider loss of soil fertility and the relationship to food security is an issue that should be identified, but has concerns about the sustainability of many current forms of land based primary production.	Allow in part
FS2.110	DairyNZ	S136.004	Objective 12	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow
FS2.111	DairyNZ	S136.022	General comments - fresh water	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept for mana whenua and although some iwi have contributed to the articulation of Te Mana o te Wai in the proposed changes to the RPS, others have chosen to define this through their Whaitua process, as they see fit. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations. Further consultation will occur through the NOF process in the NPS.	Disallow
FS2.112	Irrigation New Zealand (IrrigationNZ)	S86.001	Objective 12	Oppose in part	Irrigation does not support the health of our water, which is the first and foremost priority for Te Mana o te Wai. The careful consideration of true ecologically supportive primary industries is important.	Disallow in part

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.113	Wairarapa Federated Farmers	S163.022	General comments - fresh water	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept for mana whenua and although some iwi have contributed to the articulation of Te Mana o te Wai in the proposed changes to the RPS, others have chosen to define this through their Whaitua process, as they see fit. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow
FS2.114	Wairarapa Federated Farmers	S163.023	Freshwater introductory text	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept for mana whenua and although some iwi have contributed to the articulation of Te Mana o te Wai in the proposed changes to the RPS, others have chosen to define this through their Whaitua process, as they see fit. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow
FS2.115	Wairarapa Federated Farmers	S163.024	Table 4	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept for mana whenua and although some iwi have contributed to the articulation of Te Mana o te Wai in the proposed changes to the RPS, others have chosen to define this through their Whaitua process, as they see fit. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.116	Wairarapa Federated Farmers	S163.025	Objective 12	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow
FS2.117	Wairarapa Water Users Society	S145.001	Freshwater introductory text	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Our water is a taonga and needs to be protected as soon as possible from further detrimental impacts. It is vital that this work is undertaken immediately and these provisions strengthen good practices to ensure our water is safeguarded for future generations.	Disallow
FS2.118	Taranaki Whānui	S167.028	General comments - fresh water	Support in part	We support Taranaki Whānui to produce and provide information for this section to align with their values, and that the RSP should respond to Te Mahara Wai o te Kāhui Taiao. We also note that implementation of the NPS FM needs to involve all areas within the regions and therefore each mana whenua Te Mana o te Wai Statement needs to be recognised and provided for, to give mana to each whakaaro.	Allow in part
FS2.119	Taranaki Whānui	S167.029	Freshwater introductory text	Support in part	We welcome Taranaki Whānui to produce and introduce information into this section to align with their values. We also note that each mana whenua Te Mana o te Wai Statement needs to be recognised and provided for, to give mana to each whakaaro.	Allow in part
FS2.12	Horticulture New Zealand	S128.037	Policy IM.1: Integrated management -	Support in part	Rangitāne support a holistic and integrated approach to resource management and protecting the environment, seeing this as crucial to positive outcomes for the environment, mana whenua, communities and businesses. Further clarification of partnerships with mana whenua in the	Allow in part

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
			ki uta ki tai – consideration		resource consent process is supported where this is driven by mana whenua and enhances social, cultural, environmental and economic outcomes.	
FS2.120	Ātiawa ki Whakarongotai Charitable Trust	S131.007	General comments - overall	Support	Rangitāne o Wairarapa support this submission point. We believe that mātauranga can and will only be led (and in some instances implemented) by tangata whenua. This is something that GWRC cannot do and must defer responsibility to tangata whenua. Māori Data Sovereignty is also a very crown - tangata whenua relationship driven conversation. It is about protecting our mātauranga from misuse, by the crown and councils. It is vital that GWRC prioritises Māori Data Sovereignty (or as we have referred to it - mana mātauranga a-hapū) to ensure that safe spaces are provided for our whānau, hapū and iwi to participate in mātauranga solutions.	Allow
FS2.122	Greater Wellington Regional Council (GWRC)	S137.001	Freshwater introductory text	Support in part	Whilst Rangitāne o Wairarapa support this additional information we are concerned that the boundaries of the whaitua are too large, especially in the Wairarapa and that further work with Mana Whenua is needed to determine how these areas are taken forward.	Allow in part
FS2.123	Hutt City Council	S115.013	Objective 12	Support in part	Rangitāne o Wairarapa agree that providing a regional context to interpretation of the NPS FM is important.	Allow in part
FS2.124	Ian Gunn	S139.002	General comments - overall	Support	We endorse the submitters support for the provisions. We believe mātauranga driven and te ao Māori inclusive solutions are what our whenua and awa need to be resilient to current and future challenges, including climate change. We need to do the best we can now for our mokopuna to come.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.125	Muaūpoko Tribal Authority	S133.004	General comments - fresh water	Support in part	Rangitāne o Wairarapa support the request to include Te Mana o te Wai expressions from other iwi, however we do not consider this needs to delay the current process.	Allow in part
FS2.126	Muaūpoko Tribal Authority	S133.005	Objective 12	Support	We agree with Muaūpoko that further work is needed to articulate and provide for the respective Te Mana o te Wai Statements of mana whenua in the RPS in a way that gives effect to the NPS FM, working in partnership with GWRC to determine how best to do this. We also agree that it is unnecessary to repeat the NPS FM.	Allow
FS2.127	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.013	Freshwater introductory text	Support	Rangitāne o Wairarapa support the submitters request to insert 'margins'. This insertion properly reflects the text of the RMA.	Allow
FS2.128	Robert Anker	S31.001	General comments - fresh water	Oppose in part	The te Ao Maori worldview does not recognise these arbitrary distinctions. Whatever process is chosen, it is critical that all relevant provisions are considered in an integrated manner.	Disallow in part
FS2.129	Robert Anker	S31.013	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Oppose	Kahungunu ki Wairarapa have a right to articulate their te Mana o te Wai Statement as they see fit. Trout and Salmon are introduced ika that have destroyed our waterways and our native taonga (many ika and tuna species). Ignoring this would be not honouring Article 2 of Te Titiri o Waitangi.	Disallow
FS2.13	Horticulture New Zealand	S128.045	Policy FW.5: Water supply planning for	Oppose in part	Rangitāne supports consideration being given to climate change and water supply. Rangitāne supports the fair and equitable allocation of water to ensure resources are not over allocated and serve current and future needs.	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
			climate change and urban development – consideration		The proposed amendment to the text of the Policy is not supported as it is covered by 'water storage' already.	
FS2.130	Porirua City Council	S30.012	Objective 12	Support in part	Rangitāne agree with the submitter that further work is needed to imbed the Te Mana o te Wai statements into the RPS. Rangitāne has sought (via its original submission) to work in partnership with GWRC to determine how best to do this in a way that gives effect to the NPS FM.	Allow in part
FS2.131	Sarah (Dr) Kerkin	S96.011	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Oppose	Kahungunu ki Wairarapa have a right to articulate their te Mana o te Wai Statement as they see fit. Trout and Salmon are introduced ika that have destroyed our waterways and our native taonga (many ika and tuna species). Ignoring this would be not honouring Article 2 of Te Titiri o Waitangi.	Disallow
FS2.132	Wellington Water	S113.005	Objective 12	Support in part	Rangitāne agree with the submitter that further work is needed to imbed the Te Mana o te Wai statements into the RPS. Rangitāne has sought (via its original submission) to work in partnership with GWRC to determine how best to do this in a way that gives effect to the NPS FM.	Allow in part
FS2.133	Wellington City Council (WCC)	S140.001	General comments - overall	Oppose	While we appreciate the submitters concerns, we need ambitious timelines to ensure that we don't suffer permanent impacts of climate change and that our mokopuna are not left with the impacts of the bad decisions and actions of this generation.	Disallow
FS2.134	Te Kaunihera o Te Awa Kairangi ki Uta,	S34.054	Objective 12	Support in part	Rangitāne o Wairarapa support this and consider there are some areas where section 3.4 does not accurately reflect the NPS-FM or the RMA and could be strengthened.	Allow in part

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
	Upper Hutt City Council					
FS2.135	Anders Crofoot	S80.004	General comments - fresh water	Oppose	<p>The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.</p> <p>Rangitāne o Wairarapa supports the intent of the freshwater provisions in this plan change, but consider that additional work is needed to reflect Rangitāne o Wairarapa's vision for freshwater in a way that is clear and readily implementable. Rangitāne o Wairarapa considers that additional work is needed to fully and accurately give effect to the direction in the NPS FM that will ensure we get real change on the ground.</p>	Disallow
FS2.137	Taranaki Whānui	S167.001	General comments - fresh water	Support	Rangitāne o Wairarapa support the request to include Te Mana o te Wai expressions from other iwi. Implementation of the NPS FM needs to involve all areas within the regions and therefore each mana whenua Te Mana o te Wai Statement needs to be recognised and provided for, to give mana to each whakaaro.	Allow
FS2.138	Muaūpoko Tribal Authority	S133.001	General comments - overall	Support	Support the request to include Te Mana o te Wai expressions from other iwi.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.139	Muaūpoko Tribal Authority	S133.001	General comments - overall	Support	Rangitāne o Wairarapa support the request by Muaūpoko for acknowledgement of their connection with TeWhanganui-a-Tara throughout the RPS in any relevant provisions or introductory text.	Allow
FS2.14	Horticulture New Zealand	S128.053	Policy FW.8: Land use adaptation – non-regulatory	Support	Rangitāne are concerned at the urgency at which greenhouse gas emission reductions must be achieved and land use change is one option. Rangitāne supports the inclusion of the reference to 'lower emissions'.	Allow
FS2.15	Irrigation New Zealand (IrrigationNZ)	S86.004	Policy IM.1: Integrated management - ki uta ki tai – consideration	Oppose	Rangitāne support a holistic and integrated approach to resource management and protecting the environment, seeing this as crucial to positive outcomes for the environment, mana whenua, communities and businesses.	Disallow
					Rangitāne supports Policy IM.1. and welcomes that the policy recognises and supports several key concepts that are fundamental to te ao Māori approach to resource management, including working in partnership with local government, ki uta ki tai/integrated management, mātauranga Māori. Rangitāne does not consider it is necessary to further define the instructional words of the policy.	
FS2.16	Meridian Energy Limited	S100.001	General comments - Chapter 3	Support in part	Rangitāne agree maintaining the functionality, integrity and adaptability of infrastructure will be key to achieving community resilience to the challenges of climate change; however, this must be undertaken in a holistic and integrated manner that is fair and equitable to ensure inclusiveness and that existing inequalities in community resilience are not exacerbated.	Allow in part

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.17	Meridian Energy Limited	S100.008	Energy, infrastructure and waste introductory text	Support	Rangitāne supports the deletion of the text referring to out of date national policy direction.	Allow
FS2.18	Meridian Energy Limited	S100.017	Policy IM.2: Equity and inclusiveness – consideration	Oppose	Rangitāne supports ensuring that resource management creates fair and equitable outcomes and avoids exacerbating inequalities. The criteria included in IM.2 are supported. Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga. Rangitāne does not support the deletion of this Policy.	Disallow
FS2.19	Peka Peka Farm Limited	S118.019	General comments - overall	Support in part	Rangitāne agree the direction of the RPS needs to be clear so that it is not subject to interpretation. While we generally support the proposed amendments which relate to urban development, we agree with the submitter that further changes should be made to strengthen and clarify the objectives, policies and methods.	Allow in part
FS2.2	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.016	Policy IM.2: Equity and inclusiveness – consideration	Oppose	Rangitāne welcomes equity and inclusiveness as a consideration in resource management and decision making. The criteria included in IM.2 are supported.	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.20	Wellington Water	S113.001	General comments - Chapter 3	Support in part	Rangitane supports the maintenance of the functionality and integrity of infrastructure, and acknowledges that ensuring adaptability of infrastructure is an important factor in community resilience. Rangitāne would support protection and adaptability measures that are developed in consultation with mana whenua, that are primarily nature-based and that do not require trade-off impacts on other components of the environment.	Allow in part
FS2.21	Wellington Water	S113.007	Objective 20	Support in part	Rangitāne supports the intention of Objective 20, and does not agree that 'minimise' is too strong in this context. Climate change and natural hazard mitigation and adaptation activities should preferentially employ nature-based solutions and should not adversely impact the environment, specifically Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity.	Allow in part
FS2.22	Wellington Water	S113.039	Policy FW.5: Water supply planning for climate change and urban development – consideration	Support	Rangitāne acknowledges that saline intrusion of aquifers is a potentially significant issue relating to climate change impacts on fresh water. Rangitāne supports the relief sought by the submitter.	Allow
FS2.23	Wellington Water	S113.040	Policy FW.5: Water supply planning for climate change and urban	Support in part	Rangitāne supports the requested amendment to incorporate the ki uta ki tai approach, but seeks that protection of existing and future water sources is not just restricted to those named in these plans.	Allow in part

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
			development – consideration			
FS2.24	Winstone Aggregates	S162.001	General comments - overall	Oppose in part	Rangitāne acknowledge the importance of mineral and aggregate extraction to allow (appropriately designed and located) development. However, offsetting and compensation provisions should represent a last resort after all efforts have been made to avoid, remedy or mitigate adverse environmental impacts on indigenous biodiversity (and freshwater) from such activities. Offsetting and compensation are referred to as important tools in the effects management hierarchy, which reflect a ‘business as usual’ or ‘the way we have always done it’ approach to effects management. Rangitāne does not support any promotion of these measures in the effects management hierarchy above the duty to avoid, remedy or mitigate environmental impacts.	Disallow in part
FS2.25	Winstone Aggregates	S162.002	General comments - overall	Oppose in part	Rangitāne acknowledge the importance of mineral and aggregate extraction to allow (appropriately designed and located) development and growth. Rangitāne are concerned that any policy recognition of mineral extraction and restoration reflects an effects management hierarchy that prioritises avoidance, remedying and mitigation of environmental effects above offsetting and compensation.	Disallow in part
FS2.26	Winstone Aggregates	S162.003	General comments - overall	Support in part	Rangitāne agrees that the RPS Change 1 should be consistent with the direction of the NPS-FM, and any amendments to the NPS will need to be reflected in the RPS in due course.	Allow in part
FS2.27	Wairarapa Federated Farmers	S163.001		Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept.	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
			General comments - overall		<p>Councils are already required to have regard to the National Climate Adaptation Plan and Emissions Reduction Plan. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.</p> <p>Rangitāne believe amending the RPS to reflect the requirements of the NPS-UD and NPS-FW is urgent and should not be postponed. It is not appropriate to amend the RPS to reflect the NPS-UD in isolation because of the interconnectedness of social, cultural, environmental and economic aspects. The process should reflect an integrated resource management approach consistent with Te Ao Māori and mātauranga Māori. Rangitāne support the inclusion of issues, objectives, policies and methods that address lack of mana whenua involvement in decision making, climate change, freshwater and biodiversity.</p>	
FS2.28	Wairarapa Federated Farmers	S163.004	Overarching Issue 1: Adverse impacts on natural environments and communities	Oppose	Rangitāne strongly support the Overarching Issues as notified. Rangitāne does not support the proposed deferral of reviewing Chapter 3 or the proposed new overarching issue. The alternative issues proposed by the submitter are not issues as such, but refer to particular aspects of the issues and potential ways to address the overarching issues identified in RPS Change 1. Rangitāne acknowledges however that strengthening connections between people and place and integrated catchment management are important matters (climate change is addressed in the review). Reference to “giving back to the wai, while we utilise her waters to sustain our people”	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
					appears to be an interpretation of Te Mana o Te Wai which does not accurately reflect the hierarchy of obligations in the NPS FM.	
FS2.29	Wairarapa Federated Farmers	S163.005	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Oppose	Rangitāne strongly support the Overarching Issues as notified. Rangitāne does not support the proposed deferral of reviewing Chapter 3 or the proposed new overarching issue. The alternative issues proposed by the submitter are not issues as such, but refer to particular aspects of the issues and potential ways to address the overarching issues identified in RPS Change 1. Rangitāne acknowledges however that strengthening connections between people and place and integrated catchment management are important matters. Reference to “giving back to the wai, while we utilise her waters to sustain our people” appears to be an interpretation of Te Mana o Te Wai which does not accurately reflect the hierarchy of obligations in the NPS FM.	Disallow
FS2.3	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.046	Hazard sensitive activity	Oppose in part	Hazardous facilities and major hazardous facilities have potential to have significant adverse impacts on the environment and communities if impacted by natural hazards. Allowing such activities in areas subject to high or extreme risk of natural hazard should be avoided. The definitions could be amended to provide more certainty as to the type of facilities that would be included.	Disallow in part
FS2.30	Wairarapa Federated Farmers	S163.006	Overarching Issue 3: Lack of mana whenua / tangata whenua	Oppose	Rangitāne strongly support the Overarching Issues identified. Rangitāne strongly opposes the proposed deferral of reviewing Chapter 3 or the proposed new overarching objective. The alternative issues proposed by the submitter are not issues in themselves, but refer to particular aspects of the issues and potential ways to address the overarching issues identified in RPS	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
			involvement in decision making		Change 1. Rangitāne acknowledges that strengthening connections between people and place and integrated catchment management are important matters (climate change is addressed in the review).	
FS2.31	Wairarapa Federated Farmers	S163.020	General comments - energy, infrastructure and waste	Oppose	Rangitāne consider the proposed amendments are urgent and should not be postponed as requested by the submitter. It is not appropriate to amend the RPS to reflect the NPS-UD in isolation because of the interconnectedness of social, cultural, environmental, and economic aspects. Energy, infrastructure and waste issues are relevant. The process should reflect an integrated resource management approach consistent with Te Ao Māori and mātauranga Māori.	Disallow
FS2.32	Wairarapa Federated Farmers	S163.025	Objective 12	Oppose	Rangitāne believe the amending of the RPS is urgent and should not be postponed as proposed. It is not appropriate to amend the RPS to reflect the NPS-UD in isolation because of the interconnectedness of social, cultural, environmental, and economic aspects. Indigenous biodiversity is relevant. The process should reflect an integrated resource management approach consistent with Te Ao Māori and mātauranga Māori. Rangitāne support the inclusion of issues, objectives, policies and methods that address relevant issues relating to indigenous biodiversity, where these are guided by Te Ao Māori, as identified in overarching resource management Objective A.	Disallow
FS2.33	Wairarapa Federated Farmers	S163.063	Policy IM.1: Integrated management - ki uta ki tai – consideration	Oppose	Rangitāne strongly opposes the deletion of Policy IM.1. This policy requires an integrated approach to resource management, recognising the interconnectedness of living things with the environment, which is fundamental to Te Ao Māori and mātauranga Māori. Involvement of mana whenua in resource management and decision making is also provided for	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
					by this policy. As tangata whenua, our whānau and hapū must have a central role in this process, reflecting the unique and inseparable relationship that we have with every living thing in the taiao.	
FS2.34	Wairarapa Federated Farmers	S163.064	Policy IM.2: Equity and inclusiveness – consideration	Oppose	Rangitāne strongly opposes the relief sought. Rangitāne supports the emphasis on equity and inclusiveness in resource management and decision making of this policy. Land use, development and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of access to resources, quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga. Requiring such considerations in resource management decision making will assist in preventing existing inequities being exacerbated, increase intergenerational equity, and improve the overall wellbeing of people and communities.	Disallow
FS2.35	Wairarapa Federated Farmers	S163.072	Policy FW.5: Water supply planning for climate change and urban development – consideration	Oppose	Rangitāne opposes the relief sought by the submitter. Current irrigation practices are not consistent with the hierarchy of priorities in Te Mana o te Wai.	Disallow
FS2.36	Wairarapa Federated Farmers	S163.084	Policy FW.8: Land use adaptation – non-regulatory	Oppose	Rangitāne strongly opposes the relief sought by the submitter. Climate change will impact people and environments differently. Tangata whenua are among the population groups most at risk of the impacts of climate change. Our indigenous biodiversity, mahinga kai and taonga species are	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
					more vulnerable to environmental change such as increased temperatures and extreme rainfall. Climate change effects will greatly impact indigenous ecosystems and the ability for nature-based solutions to thrive and support communities. Rangitāne are concerned at the urgency at which greenhouse gas emission reductions must be achieved and providing for these types of land use change is one way to achieve this.	
FS2.37	Meridian Energy Limited	S100.025	Large scale generators	Support	Rangitāne support the further clarification proposed for large scale generators targeting the use of fossil fuels.	Allow
FS2.38	Meridian Energy Limited	S100.024	Climate change mitigation	Support	Rangitāne support the proposed amendment to the definition of 'climate change mitigation' to include positive actions that assist to reduce greenhouse gas emissions. Rangitāne wish to work with the submitter to ensure developing additional renewable energy sources to assist the transition to a zero emissions regional economy and reducing reliance on fossil fuels is undertaken in a manner consistent with Te Ao Māori and Te Mana o te wai for our rohe.	Allow
FS2.39	KiwiRail Holdings Limited	S124.013	Regionally significant infrastructure	Support	Rangitāne supports the submitters request to include the Interislander Ferry Terminal in Wellington in the definition of Regionally Significant infrastructure.	Allow
FS2.4	DairyNZ	S136.002	General comments - fresh water	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
					Rangitāne o Wairarapa supports the intent of the freshwater provisions in this plan change, but consider that additional work is needed to reflect Rangitāne o Wairarapa's vision for freshwater in a way that is clear and readily implementable. Rangitāne o Wairarapa considers that additional work is needed to fully and accurately give effect to the direction in the NPS FM that will ensure we get real change on the ground.	
FS2.40	Beef + Lamb New Zealand Limited	S78.001	General comments - overall	Oppose	<p>The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. These changes are long overdue and the sooner we have a strategic framework in place, the sooner implementation can begin. We need action now for our future generations.</p> <p>Rangitāne believe the scope of the amendment of the RPS is appropriate and urgent and should not be restricted as proposed. It is not appropriate to amend the RPS to reflect the NPS-UD in isolation because of the interconnectedness of social, cultural, environmental, and economic aspects and the need to adopt a holistic approach. Freshwater, indigenous biodiversity and climate change response are relevant. The process should reflect an integrated resource management approach consistent with Te Ao Māori and mātauranga Māori.</p>	Disallow
FS2.41	Kahungunu Ki Wairarapa	S169.001	Issue 5: Climate change threatens tangible and	Support	Kahungunu ki Wairarapa have a right to articulate their te Mana o te Wai Statement as they see fit.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
			spiritual components of Māori well-being			
FS2.42	Kahungunu Ki Wairarapa	S169.005	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	Kahungunu ki Wairarapa have a right to articulate their te Mana o te Wai Statement as they see fit.	Allow
FS2.43	Kahungunu Ki Wairarapa	S169.013	General comments - overall	Support	Kahungunu ki Wairarapa have a right to articulate their te Mana o te Wai Statement as they see fit.	Allow
FS2.44	Ātiawa ki Whakarongotai Charitable Trust	S131.002	General comments - overall	Support	Rangitāne strongly support the Ātiawa ki Whakarongotai (Ātiawa) view that 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. Rangitāne agree that these provisions enable mana whenua values and provide for our mātauranga to be applied to resource management.	Allow
FS2.45	Ātiawa ki Whakarongotai Charitable Trust	S131.003	General comments - climate change	Oppose	Rangitāne support the Ātiawa ki Whakarongotai view of the contemporary validity of traditional ways of knowing and accumulated knowledge; and that mātauranga Māori and indigenous knowledge are critical to informing resource management issues that the natural world faces today	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.46	Ātiawa ki Whakarongotai Charitable Trust	S131.010	Overarching Issue 1: Adverse impacts on natural environments and communities	Support	Rangitāne support Ātiawa in welcoming that the Issue references the impact on mana whenua and their relationship with te taiao.	Allow
FS2.47	Ātiawa ki Whakarongotai Charitable Trust	S131.005	General comments - indigenous ecosystems	Support	Rangitāne support Ātiawa in seeking inclusion of further reference to mana whenua values and their relationship with their culture, land, water, sites, wāhi tapu and other taonga and to partner with regional and district councils in the process to identify and schedule indigenous ecosystems and habitats.	Allow
FS2.49	Ātiawa ki Whakarongotai Charitable Trust	S131.011	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Support	Rangitāne support the proposed amendment to the wording of the Issue.	Allow
FS2.5	DairyNZ	S136.001	General comments - overall	Oppose	The NPS-FM has been in place since August 2020 and implementation should already be well under way. Te Mana o te Wai is not a new concept. Likewise, local government is already required to have regard to the National Climate Adaptation Plan and Emissions Reduction Plan. These changes are long overdue and the sooner we have a strategic framework in	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
					place to address these issues, the sooner implementation can begin. Rangitāne is concerned at the inertia in addressing climate change. We need action now for our future generations.	
FS2.50	Ātiawa ki Whakarongotai Charitable Trust	S131.012	Overarching Issue 3: Lack of mana whenua / tangata whenua involvement in decision making	Support	Rangitāne support the proposed amendment to the wording of the Issue.	Allow
FS2.51	Ātiawa ki Whakarongotai Charitable Trust	S131.015	Issue 1: Greenhouse gas emissions must be reduced significantly, immediately and rapidly	Support	Rangitāne support Ātiawa in its assessment of the issue. Rangitāne o Wairarapa welcome the acknowledgement that climate change threatens significant sites for Māori and that climate change will have an unequitable impact on Māori.	Allow
FS2.52	Ātiawa ki Whakarongotai Charitable Trust	S131.016	Issue 2: Climate change and the decline of ecosystem health and biodiversity are inseparably intertwined	Support	Rangitāne endorse Ātiawa's support for the acknowledgement of the impacts of climate change on mana whenua and our ability to exercise our way of being in Te Ao Tūroa. The proposed amendment to the text is also supported.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.53	Ātiawa ki Whakarongotai Charitable Trust	S131.017	Issue 3: The risks associated with natural hazards are exacerbated by climate change	Support	Rangitāne support Ātiawa's assessment of climate change issue 3 and welcome acknowledgement that mahinga kai are increasingly under pressure from the impacts of climate change, but also provide an indication of overall ecosystem health. The proposed amendment to the text is also supported.	Allow
FS2.54	Ātiawa ki Whakarongotai Charitable Trust	S131.018	Issue 4: The impacts of climate change will exacerbate existing inequities	Support	Rangitāne support Ātiawa in identifying that mana whenua are especially affected by the impacts of climate change and often have limited or no resources to enable mitigation or adaptation, leading to existing inequalities being exacerbated.	Allow
FS2.55	Ātiawa ki Whakarongotai Charitable Trust	S131.019	Issue 5: Climate change threatens tangible and spiritual components of Māori well-being	Support	Rangitāne support Ātiawa in highlighting that climate change impacts on both tangible and intangible components for mana whenua, threatening existence and access to sites of significance, wāhi tapu, urupā, mahinga kai, and marae.	Allow
FS2.56	Ātiawa ki Whakarongotai Charitable Trust	S131.020	Issue 6: Social inertia and competing interests need	Support	Rangitāne endorse Ātiawa's support for this issue.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
			to be overcome to successfully address climate change			
FS2.57	Ātiawa ki Whakarongotai Charitable Trust	S131.030	Indigenous ecosystems introductory text	Support	Rangitāne support Ātiawa in the proposed amendment to the text to include reference to whānau and hapū, not just iwi. Rangitāne agree it is a dated approach. Rangitāne also agree that this is particularly important in the context of actions to protect, maintain and enhance indigenous ecosystems, where whānau and hapū undertake their own efforts to restore ecosystems.	Allow
FS2.58	Ātiawa ki Whakarongotai Charitable Trust	S131.034	Natural hazards introductory text	Support	Rangitāne support Ātiawa's proposed amendment to the introductory text.	Allow
FS2.59	Ātiawa ki Whakarongotai Charitable Trust	S131.035	Objective 19	Support		Allow
FS2.6	Horticulture New Zealand	S128.001	Overarching Issue 1: Adverse impacts on natural environments and communities	Oppose in part	Urban expansion has resulted in environmental degradation (loss of mauri) and adversely affected our relationship with our culture, land, water, sites, wāhi tapu and other taonga. Loss of soil fertility and fragmentation of land should be identified as an issue but Rangitāne has concerns about the sustainability of many current forms of land based primary production.	Disallow in part

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.60	Ātiawa ki Whakarongotai Charitable Trust	S131.036	Objective 20	Support	Rangitāne support the amendment to the Objective proposed by Ātiawa.	Allow
FS2.61	Ātiawa ki Whakarongotai Charitable Trust	S131.037	Objective 21	Support	Rangitāne endorse Ātiawa's support for this objective.	Allow
FS2.62	Ātiawa ki Whakarongotai Charitable Trust	S131.038	Regional form, design and function introductory text	Support	Rangitāne support the amendment to the Introductory text proposed by Ātiawa.	Allow
FS2.63	Ātiawa ki Whakarongotai Charitable Trust	S131.045	Objective 22B	Support	Rangitāne supports the vision Ātiawa expresses for its people to be able to live their lives in their rohe in harmony with te taiao. The proposed amendment to the Objective is also supported.	Allow
FS2.64	Ātiawa ki Whakarongotai Charitable Trust	S131.055	Policy 3: Protecting high natural character in the coastal environment – district and regional plans	Support	Rangitāne support the amendment to the Policy proposed by Ātiawa, which seeks partnership with mana whenua in defining and protecting natural character.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.65	Ātiawa ki Whakarongotai Charitable Trust	S131.094	Policy FW.5: Water supply planning for climate change and urban development – consideration	Support	Rangitāne support the amendment to the Policy proposed by Ātiawa and that these matters are given appropriate consideration through the resource consent process.	Allow
FS2.66	Ātiawa ki Whakarongotai Charitable Trust	S131.047	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure – district and regional plans	Support	Rangitāne supports Ātiawa in seeking to ensure that the Regional Council partner with all parts of the community and mana whenua to manage transport infrastructure and planning so that those who face the biggest barriers are provided for.	Allow
FS2.67	Ātiawa ki Whakarongotai Charitable Trust	S131.0151	Climate change Anticipated environmental results	Support	Rangitāne supports the relief sought by Ātiawa, that the Regional Council provide more specific, measurable, and time-bound AERs and the proposed amendment to the climate change anticipated results text.	Allow
FS2.68	Ātiawa ki Whakarongotai Charitable Trust	S131.0154	Objective 14 Freshwater Anticipated	Support	Rangitāne support the amendment to the Objective proposed by Ātiawa.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
			environmental results			
FS2.69	Ātiawa ki Whakarongotai Charitable Trust	S131.0155	Indigenous ecosystems Anticipated environmental results	Support	Rangitāne support the amendment to the AERs for indigenous biodiversity proposed by Ātiawa.	Allow
FS2.7	Horticulture New Zealand	S128.009	Natural hazards introductory text	Support in part	Rangitāne support in part the amendments requested by the submitter. The natural environment (and its ability to provide food) can be significantly altered through a natural hazard event.	Allow in part
FS2.70	Ātiawa ki Whakarongotai Charitable Trust	S131.0156	Natural hazards Anticipated environmental results	Support	Rangitāne support the amendment to the AERs proposed by Ātiawa.	Allow
FS2.71	Ātiawa ki Whakarongotai Charitable Trust	S131.0157	Regional form, design and function Anticipated environmental results	Support	Rangitāne support the amendment to the AERs proposed by Ātiawa.	Allow
FS2.72	Kāinga Ora Homes and Communities	S158.039	Carbon emissions assessment	Oppose	Rangitāne opposes the proposed deletion of the definition of carbon emissions assessment, particularly when proposed by a major housing provider in the absence of a reason or suggested alternative.	Disallow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.73	Muaūpoko Tribal Authority	S133.052	Policy IM.1: Integrated management - ki uta ki tai – consideration	Support	Rangitāne endorses Muaūpoko support for the inclusion of policies that reflect requirements for integrated management.	Allow
FS2.74	Muaūpoko Tribal Authority	S133.053	Policy IM.2: Equity and inclusiveness – consideration	Support	Rangitāne endorse Muaūpoko support for the inclusion of policies that aim to achieve equity and inclusiveness.	Allow
FS2.75	Muaūpoko Tribal Authority	S133.076	General comments - overall	Support	Rangitāne support Muaūpoko seeking to have the RPS amended as submitted and support the request to consider a future plan change to include appropriate recognition as proposed.	Allow
FS2.76	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.003	Objective CC.1	Support	Rangitāne supports the proposed amendment to the objective wording.	Allow
FS2.77	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.017	Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	Rangitāne welcomes and supports Forest & Bird's support for the inclusion of Te Mana o te Wai expressions.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.78	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.019	General comments - fresh water	Support in part	Rangitāne support in part, the articulation of the overarching vision proposed by Forest & Bird. However this vision is incomplete, in that it does not articulate the Te Ao Maori dimension. This highlights the need for long term visions to be developed in partnership with tangata whenua.	Allow in part
FS2.79	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.073	Policy FW.5: Water supply planning for climate change and urban development – consideration	Support	Rangitāne support the amendment to Policy FW.5 proposed by Forest & Bird.	Allow
FS2.8	Horticulture New Zealand	S128.010	Objective 19	Support in part	Rangitane supports the intent of Objective 19 and agrees with the submitter that Objective 19 should include references to the natural environment and to food security.	Allow in part
FS2.80	Taranaki Whānui	S167.008	Overarching Objective A	Support	Rangitāne support the amendment to the overarching objective proposed by Taranaki Whānui.	Allow
FS2.81	Taranaki Whānui	S167.051	Regional form, design and function introductory text	Support	Rangitāne support the amendment to the introductory text proposed by Taranaki Whānui. Rangitāne agree that cultural visibility in urban form is important.	Allow
FS2.82	Taranaki Whānui	S167.052	Regional form, design and	Support	Rangitāne support the amendment to the introductory text proposed by Taranaki Whānui. These impacts should be highlighted and acknowledged.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
			function introductory text			
FS2.83	Taranaki Whānui	S167.056	Issue 1: Risks from natural hazards	Support	Rangitāne support the amendment to the Issue 1 text proposed by Taranaki Whānui. Rangitāne agree that the matters raised by the submitter can be adverse outcomes of poor urban design.	Allow
FS2.84	Taranaki Whānui	S167.061	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure – district and regional plans	Support	Rangitāne support the amendment proposed by Taranaki Whānui to insert a new sub-part to Policy CC.1 which ensures a focus on equity of access.	Allow
FS2.85	Te Rūnanga o Toa Rangatira	S170.002	Overarching Issue 3: Lack of mana whenua / tangata whenua involvement in decision making	Support	Rangitāne support the amendment to the Overarching Issue 1 proposed by Te Rūnanga o Toa Rangatira.	Allow
FS2.86	Te Rūnanga o Toa Rangatira	S170.004	Overarching Objective A	Support	Rangitāne support the amendment to the Overarching Issue 1 proposed by Te Rūnanga o Toa Rangatira.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.87	Te Rūnanga o Toa Rangatira	S170.006	Overarching Objective A	Support	Rangitāne support the amendment to the Overarching Objective A proposed by Te Rūnanga o Toa Rangatira.	Allow
FS2.88	Te Rūnanga o Toa Rangatira	S170.007	Issue 4: The impacts of climate change will exacerbate existing inequities	Support	Rangitāne support the reasons and proposed amendment to the climate change issue 4 proposed by Te Rūnanga o Toa Rangatira.	Allow
FS2.89	Te Rūnanga o Toa Rangatira	S170.008	Objective CC.1	Support	Rangitāne support the amendment suggested to the Objective CC.1 proposed by Te Rūnanga o Toa Rangatira.	Allow
FS2.9	Horticulture New Zealand	S128.011	Objective 20	Support in part	Rangitāne agree that rewording may assist to clarify the intent of the objective and that 'minimise' should continue to apply to both natural hazard mitigation and adaptation and climate change mitigation and adaptation activities. Many areas affected by natural hazard have associated values, indigenous biodiversity and ecosystems (eg rivers, coasts and wetlands) which are also impacted by these activities. Impacts from mitigation and adaptation activities on these areas should be minimised.	Allow in part
FS2.90	Te Rūnanga o Toa Rangatira	S170.013	General comments - energy, infrastructure and waste	Support	Rangitāne support Te Rūnanga o Toa Rangatira's request for the matters raised to be addressed in the the Energy, infrastructure and waste chapter. Rangitāne agree with the reasons for this request as outlined by the submitter.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.91	Te Rūnanga o Toa Rangatira	S170.014	General comments - overall	Support	Rangitāne support the proposed strengthening of the wording of the Objective by Te Rūnanga o Toa Rangatira.	Allow
FS2.92	Te Rūnanga o Toa Rangatira	S170.016	Indigenous ecosystems introductory text	Support	Rangitāne support the proposed amendment to the introductory text for Indigenous biodiversity by Te Rūnanga o Toa Rangatira.	Allow
FS2.93	Te Rūnanga o Toa Rangatira	S170.047	Policy IM.1: Integrated management - ki uta ki tai – consideration	Support	Rangitāne support the amendment to Policy IM.1 proposed by Te Rūnanga o Toa Rangatira.	Allow
FS2.94	Te Rūnanga o Toa Rangatira	S170.079	Issue 5: Climate change threatens tangible and spiritual components of Māori well-being	Support	Rangitāne support the proposed strengthening of the issue proposed by Te Rūnanga o Toa Rangatira.	Allow
FS2.95	Te Rūnanga o Toa Rangatira	S170.088	Policy IM.2: Equity and inclusiveness – consideration	Support	Rangitāne agree with and support the suggestion by Te Rūnanga o Toa Rangatira that Policy IM.2 should apply to all policy in the RPS, and that the issues raised by the submitter should be recognised.	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS2.96	Te Tumu Paeroa Office of the Māori Trustee	S102.001	Overarching Objective A	Support	Rangitāne support the amendment to Overarching Objective A proposed by Te Tumu Paeroa. Giving effect to Te Mana o te Wai should be an essential element of integrated management of the environment.	Allow
FS2.97	Te Tumu Paeroa Office of the Māori Trustee	S102.002	Overarching Objective A	Support	Rangitāne support the amendment to Overarching Objective A proposed by Te Tumu Paeroa. The proposed amendment would strengthen the objective.	Allow
FS2.98	Te Tumu Paeroa Office of the Māori Trustee	S102.026	Policy IM.1: Integrated management - ki uta ki tai – consideration	Support	Rangitāne support the proposal by Te Tumu Paeroa that Policy IM.1 to be changed to a regulatory policy.	Allow
FS2.99	Te Tumu Paeroa Office of the Māori Trustee	S102.027	Policy IM.2: Equity and inclusiveness – consideration	Support	Rangitāne support the proposal by Te Tumu Paeroa that Policy IM.2 to be changed to a regulatory policy.	Allow

Further Submission - RMA Form 6

This submission form should be used for making a further submission on Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region (in accordance with Clause 8 of the First Schedule, Resource Management Act 1991)

To: Greater Wellington Regional Council
Email to: regionalplan@gw.govt.nz
Subject: Further submission on Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region
Post: PO Box 11646, Manners Street, Wellington 6142, ATT: Hearings Advisor.

Further Submitter Contact Details			
Full Name	<i>Last Name</i>		<i>First Name</i>
	Cottle		Kim
Company/Organisation Name (if applicable)	Waka Kotahi NZ Transport Agency (Waka Kotahi)		
Contact Person	Kim Cottle		
Email Address for Service	Kim Harris-Cottle: kim.harris-cottle@nzta.govt.nz & Environmental Planning: Environmentalplanning@nzta.govt.nz		
Address	Level 7, Majestic Centre 100 Willis Street Wellington 6145		
Mail Address for Service (if different)	PO BOX 5084 Wellington 6140		
Phone	<i>Mobile</i>	<i>Home</i>	<i>Work</i>
			Kim Harris-Cottle 021 315 306
Attendance and wish to be heard at the hearing:			
Waka Kotahi does wish to be heard in support of my further submission			
Waka Kotahi will consider presenting a joint case with other submitters, who make a similar further submission, at a hearing.			
Relevance:			

I am a person who has an interest in the proposal that is greater than an interest the general public has

Explain/specify the grounds for saying that you come within this category (you must fill this in):

Waka Kotahi NZ Transport Agency is a Crown Entity with statutory obligations of ensuring an integrated, safe and sustainable transport system.

Signature of person making further submission
(or person authorised to sign on behalf of person making further submission)



Kim Cottle – Principal Planner, Environmental Planning

14 December 2022

Submitter Name/Contact	Submission Number	Chapter	Support or Oppose	The particular parts of the submission I support or oppose are:	The reasons for my support or opposition are:	I seek that the whole or part (describe part) of the submission be allowed or disallowed:
S2 Zara Wills	S2.002	General comments - overall	Neutral	Regional Council to enable greenfield development in Wainuiomata North	Further site-specific evidence and information is required to understand the need to rezone greenfield land.	Should this be considered Waka Kotahi request further site-specific assessments to assess accessibility to active and public transport, infrastructure requirements (including stormwater) and any reverse sensitivity issues.
S158 Kāinga Ora Homes and Communities	S158.043	General comments - overall	Support	Kāinga Ora supports the intent of PC1, in general, and seeks better clarity within the objectives and policies so that they are measurable and provide direction as to how the objectives or policy can be achieved.	Waka Kotahi agrees that better clarity is needed on how the objectives and policies will be achieved.	Waka Kotahi seeks that the submission point be allowed and seeks to be involved in the development of any amendments.
S158 Kāinga Ora Homes and Communities	S158.046	General comments - overall	Support	Kāinga Ora 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).	Waka Kotahi agree that amendments should be aligned with national direction.	Waka Kotahi seeks that the submission point be allowed and seeks to be involved in the development of any amendments.
S162 Winstone Aggregates	S162.001	General comments - overall	Support in part	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, and how offsetting and compensation will be used.	Waka Kotahi supports the use of offsetting and compensation as appropriate and consistent with the NPS FM and NPS IB when confirmed.	Waka Kotahi seeks that the submission point be allowed as it is important to be able to use offsetting and compensation as appropriate to mitigate effects. Waka Kotahi seeks to be involved in the development of amendments to address this issue.
S30 Porirua City Council	S30.0114	General comments - overall	Support	Provisions are poorly drafted and they need a major overhaul and redrafting	Waka Kotahi supports this submission point and seek further clarity in the provisions to ensure alignment with the regulatory frameworks and National Planning Standards.	Waka Kotahi seeks that the submission point be allowed and would like to be involved in any redrafting.
S100 Meridian Energy Limited	S100.001	General comments - Chapter 3	Support	Insert into the overview of issues the following additional issue numbered '4' (or words that have similar effect): "The overarching resource management issues for the Wellington Region are: 1. 2. 3. 4. The region's environment, communities and infrastructure are vulnerable to future national and global challenges associated with	WK supports the recognition of regionally significant infrastructure as an overarching resource management issue.	Waka Kotahi seeks that this submission point be allowed

				climate change. Climate change is expected to exacerbate flood hazard, including coastal inundation, and drought conditions. The effects of climate change, including coastal and river flood inundation and erosion, are expected to damage or impair the operation of infrastructure (including regionally significant infrastructure). Community resilience to the effects of climate change will depend on the functionality, integrity and adaptability of infrastructure. Regionally significant infrastructure will need to be upgraded and adapted or relocated to maintain the necessary functionality and capacity to support community resilience."		
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.003	Overarching Objective A	Support in part	Amend subclause (e) as follows: (e) recognises the role of both natural and physical resources in providing for the provides for and enhances characteristics and qualities of well-functioning urban environments which are supported by both natural and physical resources, including regionally significant infrastructure; and	Waka Kotahi supports the submission point in that it recognises the role of regionally significant infrastructure in supporting well-functioning urban environments.	Waka Kotahi seeks that the role of regionally significant infrastructure is recognised.
S158 Kāinga Ora Homes and Communities	S158.003	Overarching Objective A	Support	Seeks clarity on sub point (f) of this objective to either expand on what the future pressures of climate change are or whether this sub-point can be redrafted to be more directive as per the relief sought. Amend sub-point (f) as follows: (f) responds effectively to the current and future pressures of climate change, population growth and development. (f) is resilient to the likely current and future effects of climate change.	Waka Kotahi supports the submission point that more clarity is needed on the provisions relating to future pressures of climate change.	Waka Kotahi seeks that the submission point be allowed and would like to be involved in redrafting.
S165 Royal Forest and Bird Protection Society of New	S165.001	Overarching Objective A	Oppose	Objective A is not clear enough and a more directive statement is required.	Waka Kotahi has concerns with overarching use of the word 'protects' rather than 'manage' and how this wording may be implemented.	Waka Kotahi seeks that the submission point be disallowed. If allowed Waka Kotahi would like to be involved in any redrafting.

Zealand Inc. (Forest & Bird)				<p>Include the following (or similar): (x) maintains and protects indigenous biodiversity, natural landscapes, and the life-supporting capacity of ecosystems (y) protects the coastal environment (z) protects freshwater [Note: end of amendments]</p> <p>Consider amending the pōtai to clarify how Te Ao Māori will interact the listed items. Ensure that protection and maintenance of indigenous biodiversity is paramount.</p>		
S100 Meridian Energy Limited	S100.004	Objective CC.1	Support	<p>Insert explicit reference to 'regionally significant infrastructure' (a defined term in the operative RPs) into clause (c) of objective CC.1: By 2050, the Wellington Region is a low- emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</p> <p>(a) sustainable air, land, freshwater, and coastal management,</p> <p>(b) well-functioning urban environments and rural areas, and</p> <p>(c) well-planned infrastructure (including regionally significant infrastructure).</p>	Waka Kotahi support the further clarification of “well-planned infrastructure” and recognition of regionally significant infrastructure.	Waka Kotahi seeks that this submission point be allowed.
S30 Porirua City Council	S30.007	Objective CC.4	Support	<p>Amend the objective so that it is clear what the outcome sought is.</p>	Waka Kotahi supports further clarification on outcome sought.	Waka Kotahi seeks that this submission point be allowed.
S134 Powerco Limited	S134.002	Objective CC.6	Support	<p>Amend Objective CC.6 to acknowledge the need for increased resilience of infrastructure, including regionally significant infrastructure, against the adverse effects of climate change. This could be achieved by making the following changes:</p> <p>"Resource management and adaptation planning increase the resilience of communities, infrastructure (including regionally significant infrastructure) and the natural environment to the short,</p>	Waka Kotahi supports recognition of regionally significant infrastructure.	Waka Kotahi seeks that this submission point be allowed.

				medium, and long-term effects of climate change."		
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.019	General comments - fresh water	Oppose	<p>Add a new overarching vision to apply to all FMUs in Greater Wellington as follows: "All of Greater Wellington catchment vision" By no later than 2040, in all Greater Wellington catchments:(1) Water bodies are protected, or restored to a state of good health, well-being and resilience,(2) Activities relating to water support the health, well-being and resilience of affected waterbodies,(3) The natural form and function of water bodies, including with respect to water quality, sedimentation and flows, mimics that of their natural behaviour,(4) Ecosystem connections between freshwater, wetlands and the coastal environment are protected and restored,(5) Wetland, estuary and lagoon extent has been restored a much as practical where it has been lost, and their quality is protected and restored,(6) The habitat of indigenous freshwater species is protected and restored, and indigenous species are able to migrate easily within and between catchments, except where it is desirable to prevent the passage of some fish species in order to protect indigenous species, their life stages, or their habitats,(7) Food is available to be harvested from water bodies and is safe to consume,(8) People have abundant, quality opportunities to connect with and safely undertake recreational activities within or close to a wide range of water bodies,(9) There are no direct discharges of wastewater to water bodies.</p> <p>Make the required consequential amendments to specific FMU visions to ensure the overarching vision above applies to all of them while</p>	Waka Kotahi has concerns over the proposed wording with no clarity regarding the existing environments, specific outcomes sought and likely requirements to implement this policy.	Waka Kotahi seeks that the submission point be disallowed, or alternatively if allowed Waka Kotahi would like to be involved in redrafting.

				retaining FMU specific provisions and timeframes where these contain more stringent protection of the health and well-being of water bodies and freshwater ecosystems than provided for in the overarching vision		
S113 Wellington Water	S113.006	General comments - indigenous ecosystems	Support	Provide the most appropriate pathways for delivering RSI and its benefits by either <ul style="list-style-type: none"> • Deleting this component of the RPS change • Updating the RPS change to reflect the final gazetted version of the NPS-IB • Reflecting the provisions for specified infrastructure and associated benefits in the NPS-IB exposure draft in the RPS. 	Waka Kotahi supports this chapter being aligned with the final version of the NPS IB	Waka Kotahi seeks that this submission point be allowed.
S25 Carterton District Council	S25.014	General comments - regulatory policies	Support	Re-label policies so that numbering is continuous, or group the CC, FW and IE policies together.	Waka Kotahi supports this submission point – better consistency is needed.	Waka Kotahi seeks that this submission point be allowed.
S124 KiwiRail Holdings Limited	S124.003	Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans	Support	KiwiRail supports the new policy which requires transport infrastructure planning to consider and choose solutions that will contribute to reducing greenhouse gas emissions.	Waka Kotahi supports the submission point and also seeks further clarity as to how this will be implemented.	Waka Kotahi seeks that this submission point be allowed and requests involvement with any redrafting to ensure clarity as to how it would be implemented.
S113 Wellington Water	S113.014	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Support	Amend the Policy as follows: District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, where practicable .	Waka Kotahi supports this submission point as nature-based solutions are not always viable and need to be considered where practicable.	Waka Kotahi seeks that this submission point be allowed.
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.025	Policy 14: Urban development effects on freshwater and the	Support in part	Amend policy (d) Identify how to achieve the target attribute states set for the catchment;	Waka Kotahi agrees in part with the submission point, in that avoiding of all adverse effects in all circumstances is unlikely to be achievable – particularly where it relates to hydrological control.	Waka Kotahi seeks that the policy is amended to provide for some flexibility in certain situations when it comes to hydrological control.

		coastal marine area - regional plans				
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.026	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	Amend. (e) Require the development, including stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan to the extent practicable ;	Waka Kotahi agrees in part with the submission point, in that avoiding of all adverse effects in all circumstances is unlikely to be achievable – particularly where it relates to hydrological control.	Waka Kotahi seeks that the policy is amended to provide for some flexibility in certain situations when it comes to hydrological control.
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.030	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support in part	j) Require hydrological controls to avoid reduce adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows ;	Waka Kotahi agrees in part with the submission point, in that avoiding of all adverse effects in all circumstances is unlikely to be achievable – particularly where it relates to hydrological control..	Waka Kotahi seeks that the policy is amended to provide for some flexibility in certain situations when it comes to hydrological control.
S158 Kāinga Ora Homes and Communities	S158.019	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Support	Amend sub-point (i) as follows: (i) Require riparian buffers for all waterbodies and avoid piping of rivers where practicable and where the effects cannot be avoided, they are minimised or remedied. Aquatic offsetting or compensation may be used where the piping of the river cannot be avoided, minimised or remedied.	Waka Kotahi supports the submission point and considers that alignment with the NPS FM is appropriate.	Waka Kotahi seeks that this submission point be allowed.
S96 Sarah (Dr) Kerkin	S96.014	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Either make the restoration of wetlands a non-regulatory method; or Amend the policy so the requirement to restore only applies to natural wetlands and not to areas like the peatland that have been so degraded they have ceased to be natural wetlands	Waka Kotahi supports a targeted approach to the restoration of wetlands.	Waka Kotahi seeks that this submission point be allowed.
S32 Director-General of Conservation	S32.031	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	Subclauses which require "restricting" specified activities do not address how or to what extent those activities should be restricted. In all cases these are activities which are inconsistent with national direction, especially the NPSFM, so it would be appropriate that they be minimised, not just restricted. Seek amendment "(r)restoring and maintaining fish passage	Waka Kotahi supports a targeted approach to restoring and maintaining fish passage.	Waka Kotahi seeks that this submission point be allowed.

				where appropriate"		
S128 Horticulture New Zealand	S128.032	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	<p>Clause (e) more stringent that Policy 7 NPSFM of the RMA which reads" The loss of river extent and values is avoided to the extent practicable." The proposed change is missing 'to the extent practicable' - it is unclear why/whether this is intentional.</p> <p>Amend as follows: (e) avoiding the loss of river extent and values to the extent practicable;</p>	Waka Kotahi supports the implementation of the NPS FM.	Waka Kotahi seeks that this submission point be allowed.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.052	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	<p>Amend as follows: Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of water bodies including, which ensure the following: Remove coastal wetlands from clause (c) and include a new policy specifically for coastal wetlands that gives effect to the NZCPS as follows: (x)(i) avoid adverse effects of activities on NZCPS policy 11(a) values of coastal wetlands; (ii) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on any NZCPS policy 11(b) values of coastal wetlands; (iii) preserve the natural character of coastal wetlands in accordance with policy 13 NZCPS; (iv) promote restoration of coastal wetlands in accordance with policy 14 NZCPS; and (v) avoid reclamation in coastal wetlands in accordance with policy 10 NZCPS. Amend clauses (i),(j) and (k) as follows: (i) promoting the retention of retaining in-stream habitat diversity by retaining natural features - such as pools, runs, riffles, and the river's natural form; (j) promoting the retention of retaining natural flow regimes - such as flushing flows;(k)</p>	Waka Kotahi has concerns about the use of the word 'avoiding' and seeks clarity as to how the proposed wording would be implemented.	Waka Kotahi seeks that the submission point be disallowed

				<p>promoting the protection and reinstatement of riparian habitat; Amend clauses (n)-(q) as follows:</p> <p>(n) discourage restricting avoiding the reclamation, piping, straightening or concrete lining of rivers;</p> <p>(o) discourage restricting avoiding stock access to estuaries, rivers, lakes and wetland;</p> <p>(p) discourage restricting avoiding the diversion of water into or from wetlands - unless the diversion is necessary to restore the hydrological variation to the wetland;</p> <p>(q) discourage restricting the removal or destruction of indigenous plants in wetlands and lakes; and</p> <p>Amend clause (r) as follows:</p> <p>(r) restoring and maintaining indigenous fish passage, except where it is desirable to prevent the passage of some fish species in order to protect indigenous species, their life stages, or their habitats.</p>		
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.034	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	Amend subclause (m) Require hydrological controls to avoid reduce adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;	Waka Kotahi supports this submission point due to concerns with the use of the word 'avoid', which provides a strict requirement that is inconsistent with NPS FM.	Waka Kotahi seeks that the submission point be allowed.
S100 Meridian Energy Limited	S100.016	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	Delete clause (c); and Delete clause (d) or, in the alternative, replace clause (d) with a requirement for at least no net loss (and preferably a net gain) as follows (or similar) and amend the explanation to match the policy amendments: "By 30 June 2025, District and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development. Where the policies and/or rules	Waka Kotahi supports the ability to use a more targeted and catchment-based approach to biodiversity offsetting with specific rationale given to appropriate methods on a case by case basis.	Waka Kotahi seeks that the submission point be allowed.

			<p>in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall:</p> <p>(a) ...</p> <p>(b) ...</p> <p>(c) ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation);</p> <p>(d) require that the outcome sought from the use of biodiversity offsetting is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit. achieves at least no net loss and preferably a net gain of biodiversity.</p> <p>....</p> <p>Explanation</p> <p>Policy 24 applies to provisions in regional and district plans. The policy provides clarity about the limits to, and expected outcomes from, biodiversity offsetting and biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values. Ecosystems and species known to meet the criteria in clauses (a) and (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation). Calculating a 10 percent net biodiversity gain (offsetting) or a 10 percent net biodiversity benefit (compensation) employs the same or a similar calculation methodology used to determine 'no net loss or preferably net gain' under a standard offsetting approach. The distinction between 'net gain' and 'net benefit' is to recognise that the outcomes achievable through the use of offsetting and compensation are different. An offsetting 'net biodiversity gain' outcome is expected to achieve an</p>		
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				objectively verifiable increase in biodiversity values while a compensation 'net biodiversity benefit' outcome is more subjective and less preferable.'		
S158 Kāinga Ora Homes and Communities	S158.024	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	Seeks that this policy is aligned within the NPS-IB once gazetted.	Waka Kotahi agree that policies should be aligned with national direction including the NPS-IB.	Waka Kotahi seeks that the submission point be allowed.
S113 Wellington Water	S113.027	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Amend clause (d) as follows: (d) include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme or to appropriately manage the risk for regionally significant infrastructure.	Waka Kotahi supports the recognition that regionally significant infrastructure cannot always avoid high risk areas, and often have a functional need to locate in such areas. For example, the transport network often provides a lifeline function to communities that cannot be relocated.	Waka Kotahi seeks that the submission point be allowed.
S158 Kāinga Ora Homes and Communities	S158.026	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Support	Seeks a regionally consistent approach in the hierarchy of centres and therefore seeks amendments to the policy to align with those submissions (of IPI Plan Changes) and the national planning standards.	Waka Kotahi supports a regionally consistent approach in the hierarchy of centres and consistency with the national planning standards.	Waka Kotahi seeks that the submission point be allowed.
S158 Kāinga Ora Homes and Communities	S158.027	Policy 31: Identifying and enabling a range of building heights and density - district plans	Support	Seeks a regionally consistent approach in the hierarchy of centres and therefore seeks amendments to the policy to align with those submissions (of IPI Plan Changes) and the national planning standards. Also considers that the policy as notified does not add any additional value than what is stated within the NPS-UD and therefore seeks better direction for where high density development should occur and within prescribed minimum walkable catchments.	Waka Kotahi supports a regionally consistent approach in the hierarchy of centres and consistency with the national planning standards.	Waka Kotahi seeks that the submission point be allowed.
S158 Kāinga Ora Homes and Communities	S158.001	General comments - consideration policies	Support in part	Considers that all of the policies in Chapter 4.2 have been worded to read as assessment criteria	WK supports submission in part and also seeks clarification as to the intent and implementation of this policy.	Waka Kotahi seeks clarification as to the intent and implementation of this policy.

				for consideration within other resource management approval processes such as resource consents. Notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria). Seek that all policies directing matters of consideration for resource consent are deleted from the regional policy statement in full.		
S100 Meridian Energy Limited	S100.017	Policy IM.2: Equity and inclusiveness - consideration	Support in part	Delete Policy IM.2 and the accompanying explanation.	Waka Kotahi seeks further clarity on the intent and implementation of this policy.	Waka Kotahi seeks clarification as to the intent and implementation of this policy
S140 Wellington City Council (WCC)	S140.059	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	Overall WCC supports the intent of Policy CC.9, however the wording is uncertain and confusing meaning it will be difficult to implement in a consistent and practicable manner. WCC seek that Policy CC.9 is deleted	Waka Kotahi seeks further clarity on the intent and implementation of this policy.	Waka Kotahi seeks clarification as to the intent and implementation of this policy
S140 Wellington City Council (WCC)	S140.061	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support in part	Amend title to read: Encouraging whole of life carbon emissions assessment for transport infrastructure - consideration [End of amendments to Policy CC.11] Clarify and refine policy wording to provide greater certainty of how this policy will be implemented.	Waka Kotahi seeks to understand how this policy will align with Central Government direction. Waka Kotahi requests further clarity on the intent and implementation of this policy.	Waka Kotahi seeks clarification as to the intent and implementation of this policy
S49 Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand Trading Limited	S49.004	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support	Retain Policy 39, with an amendment to explain what is meant by the statement <i>in particular where it contributes to reducing greenhouse gas emissions.</i>	Waka Kotahi supports this submission point and seeks further clarification about the intent and implementation of this policy.	Waka Kotahi seeks this submission point be allowed and seeks clarification as to the intent and implementation of this policy.
S134 Powerco Limited	S134.015	Policy 40: Protecting and enhancing the health and well-being of water bodies and	Support	Amend Policy 40 to recognise that enhancement of waterbodies and freshwater ecosystems may not be necessary or practicable in all cases and that the policy focus is on the quality of fresh water	Waka Kotahi supports this submission point and has concerns with the implementation requirements of the words "protect and enhance".	Waka Kotahi seeks that this submission point be allowed.

		freshwater ecosystems - consideration		rather than coastal water. This could be achieved by making changes along the following lines: "Policy 40: Maintaining Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration When considering an application for a regional resource consent, particular regard shall be given to: (a) that water quality, flows and water levels and aquatic habitats of waterbodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of waterbodies and the health and wellbeing of freshwater ecosystems; (b) that, requiring as a minimum, water quality in the coastal marine area is to be managed in a way that protects and enhances the health and well-being of waterbodies and the health and wellbeing of marine ecosystems.: ..."		
S100 Meridian Energy Limited	S100.020	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Delete the following proposed amendments to Policy 41 and restore the operative wording as follows: Policy 41: Controlling Minimising the effects of earthworks and vegetation disturbance - consideration When considering an application for a resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by to minimise: (a) erosion; and (b) considering whether the activity will achieve environmental outcomes and target attribute states; silt and sediment runoff into water, or onto or into land that may enter water, so that healthy aquatic ecosystems are sustained. ; and (c) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for	Waka Kotahi supports this submission point and seeks further clarification about the intent and implementation of this policy	Waka Kotahi seeks this submission point be allowed and seeks clarification as to the intent and implementation of this policy

				<p>suspended sediment are not met.Explanation An area of overlapping jurisdiction between Wellington Regional Council and district and city councils is the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on erosion prone land in rural areas and many small scale earthworks in urban areas - such as driveways and retaining walls - can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to minimise erosion and silt and sedimentation effects associated with these activities. Minimisation requires effects to be reduced to the extent reasonably achievable whilst recognising that erosion, siltation and sedimentation effects can not always be completely avoided.</p>		
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.039	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	<p>Amend subclause:</p> <p>(k) The extent to which Require hydrological controls to avoid reduce adverse effects of stormwater runoff quantity (flows and volumes) and maintain, to the extent practicable, on natural stream flows</p>	Waka Kotahi supports the use of “reduce” rather than “avoid” due to the lack of clarity regarding the intent and implementation of this policy.	Waka Kotahi seeks this submission point be allowed and seeks clarification as to the intent and implementation of this policy
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.035	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	<p>Amend subclause:</p> <p>(g) The ability for Require that the development, including stormwater discharges, earthworks and vegetation clearance to meets any limits set in a regional plan and the effects of any exceedances;</p>	Waka Kotahi supports the submission point ack of clarity regarding the intent and implementation of this policy.	Waka Kotahi seeks this submission point be allowed and seeks clarification as to the intent and implementation of this policy
S148 Wellington International Airport Ltd (WIAL)	S148.048	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	Delete this policy or amend to acknowledge that regionally significant infrastructure is not inappropriate development in certain high hazard locations.	Waka Kotahi supports recognition that regionally significant infrastructure cannot always avoid high risk areas and often have a functional need to locate in such areas. For example, the transport network often provides a lifeline function to communities that cannot be relocated.	Waka Kotahi seeks this submission point be allowed

S124 KiwiRail Holdings Limited	S124.008	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Policy 52 is retained	Waka Kotahi supports this submission point, as the policy recognises that in some instances, hard engineering methods are necessary to protect regionally significant infrastructure.	Waka Kotahi seeks this submission point be allowed
S124 KiwiRail Holdings Limited	S124.009	Policy 55: Providing for appropriate urban expansion - consideration	Support	KiwiRail supports the amendment to Policy 55 which recognises the value of regionally significant infrastructure and the contribution of such infrastructure to a well-functioning urban environment. The reference to Policy 8 which expressly recognises the importance of protecting regional significant infrastructure from incompatible subdivision, use and development is supported.	Waka Kotahi supports this submission point, as the policy recognises the value of regionally significant infrastructure.	Waka Kotahi seeks this submission point be allowed
S137 Greater Wellington Regional Council (GWRC)	S137.040	Policy 55: Providing for appropriate urban expansion - consideration	Support	Amendments are required to improve readability, consistency and clarity, including fixing references to policy numbers. Ensure reference to 'low and zero-carbon multi modal transport' is consistent with other provisions.	Waka Kotahi supports the amendments proposed for further clarity in the submission point.	Waka Kotahi seeks this submission point be allowed
S148 Wellington International Airport Ltd (WIAL)	S148.051	Policy 55: Providing for appropriate urban expansion - consideration	Support	WIAL submits that in considering urban development particular regard should also be had to whether it is compatible with and does not adversely affect or constrain the ability to operate existing regionally significant infrastructure. Amend the policy to include (or with similar effect): avoids adverse reverse sensitivity effects on the operation and safety of regionally significant infrastructure.	Waka Kotahi supports the submission point as–future reverse sensitivity effects on the operation and safety of regionally significant infrastructure should be avoided.	Waka Kotahi seeks this submission point be allowed
S124 KiwiRail Holdings Limited	S124.010	Policy 56: Managing development in the rural areas - consideration	Support	New subclause.(f) the proposal will result in reverse sensitivity effects.	Waka Kotahi supports the submission point as–future reverse sensitivity effects on the operation and safety of regionally significant infrastructure should be avoided.	Waka Kotahi seeks this submission point be allowed

S124 KiwiRail Holdings Limited	S124.011	Policy 57: Integrating land use and transportation - consideration	Support	New subclause iii. Let's Get Wellington Moving Growth Corridor; and(g) avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.	Waka Kotahi supports the submission point as—future reverse sensitivity effects on the operation and safety of regionally significant infrastructure should be avoided.	Waka Kotahi seeks this submission point be allowed
S124 KiwiRail Holdings Limited	S124.012	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support	New subclause under (a) (a) the location, design and layout of the proposal:.....iv. minimises land use conflicts as far as practicable, including avoiding the potential for reverse sensitivity effects.	Waka Kotahi supports the submission point as—future reverse sensitivity effects on the operation and safety of regionally significant infrastructure should be avoided.	Waka Kotahi seeks this submission point be allowed
S129 Waka Kotahi NZ Transport Agency	S129.013	Method CC.10: Establish incentives to shift to active and public transport	Neutral	Our submission on Method CC.10 has been mixed up with submission on policy 9.	Original submission was to retain Method CC.10 as notified as Waka Kotahi acknowledges that we have similar mode shift behaviour change incentives.	Waka Kotahi seeks the submission point as in our original submission be allowed.
S100 Meridian Energy Limited	S100.027	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support	The justification for inclusion of some of the items in proposed Appendix 1A is unclear – delete appendix 1A.	Waka Kotahi supports as the broad categories require further clarification provided on a more targeted and catchment-based approach to biodiversity offsetting with specific rational given to appropriate methods on a case by case basis.	Waka Kotahi seeks that the submission point be allowed.
S115 Hutt City Council	S115.0117	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support	Delete appendix 1A. We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	Waka Kotahi supports this submission point, as regional direction should be aligned with national direction.	Waka Kotahi seeks that the submission point be allowed.
S124 KiwiRail Holdings Limited	S124.015	General comments - definitions	Support	New definition of "well-functioning urban environments" "Well-functioning urban environment has the meaning in Policy 1 of the National Policy Statement on Urban Development 2020.	Waka Kotahi supports the inclusion of a definition for well-function urban environments that is aligned with the NPS-UD	Waka Kotahi seeks that the submission point be allowed.
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.049	General comments - definitions	Support in part	Include a new definition of transport infrastructure	Waka Kotahi supports the inclusion of a definition for transport infrastructure that is also aligned with regional and national roles and responsibilities.	Waka Kotahi seeks to be included in any redrafting of a definition should the submission point be allowed.

S158 Kāinga Ora Homes and Communities	S158.038	General comments - definitions	Support	Seeks that definitions are aligned with any relevant National Policy Statements or the National Planning Standards where applicable.	Waka Kotahi supports the submission point and agree that regional direction should be aligned with national direction.	Waka Kotahi seeks that the submission point be allowed.
S162 Winstone Aggregates	S162.019	General comments - definitions	Support	Include definition for quarrying activities.	Waka Kotahi supports the inclusion of a definition for quarrying activities.	Waka Kotahi seeks that the submission point be allowed.
S115 Hutt City Council	S115.0120	General comments - definitions	Support in part	Include definition for high carbon transport modes	Waka Kotahi supports further clarity of what high carbon transport modes are with the introduction of a definition.	Waka Kotahi seeks to be included in any redrafting of a definition should the submission point be allowed.
S115 Hutt City Council	S115.0122	General comments - definitions	Support in part	Include definition for "low and zero-carbon modes"	Waka Kotahi supports further clarity with the inclusion of a definition for low and zero carbon modes	Waka Kotahi seeks to be included in any redrafting of a definition should the submission point be allowed.
S30 Porirua City Council	S30.0100	Carbon emissions assessment	Support	Delete definition or amend so that it provides clear and appropriate direction to plan users.	Waka Kotahi supports this submission point, but considers that further clarity is needed on the intent and implementation of this definition.	Waka Kotahi seeks clarification as to the intent and implementation of this definition.
S30 Porirua City Council	S30.0102	Climate change mitigation	Support	Delete definition or amend so that it provides clear and appropriate direction to plan users.	Waka Kotahi supports this submission point but considers that further clarity is needed on how this will be implemented.	Waka Kotahi seeks clarification as to the intent and implementation of this definition.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.0108	Strategic Transport network	Support	Amend methods and provisions for consistency.	Waka Kotahi supports this submission point that greater consistency is needed.	Waka Kotahi seeks that the submission point be allowed.
S158 Kāinga Ora Homes and Communities	S158.049	Regional form, design and function Anticipated environmental results	Support in part	Consequential to the changes sought to Objective 22, seeks changes to the anticipated environmental results.	Waka Kotahi support the intent of the submission point, that changes should be made to line up with other changes sought to objective 22.	Waka Kotahi seek that the anticipated environmental results are consistent with any changes to objective 22.

FS4 – CentrePort Limited

Address for service: william.woods@centreport.co.nz

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS4.1	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.075	Policy 51: Minimising the risks and consequences of natural hazards – consideration	Oppose	Avoidance of natural hazard risk is not possible. NZCPS Policy 25 relates to avoidance of increased risk, not all risk. Minimising risk is a more appropriate concept.	Disallow
FS4.2	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.076	Policy 52: Minimising adverse effects of hazard mitigation measures – consideration	Oppose in part	Avoiding natural hazard risk is not possible. Minimising risk is a more appropriate concept.	Disallow in part
FS4.3	Wellington International Airport Ltd (WIAL)	S148.028	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change – consideration	Support	the concept of nature based solutions is unclear and the policy creates uncertainty for regionally significant infrastructure, particularly as adverse effects are to be avoided.	Allow

FS5 – Brendan Herder

Address for service: brendanherder@gmail.com

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
FS5.1	Gerald Keown _Mangaroa Peatland Focus Group	S52.002	Climate change introductory text	Support	This amendment to remove the words "and restore" should be allowed. The concept of restoration (including to what prior state) is not sufficiently defined and is particularly problematic in the context of the enforcement actions declined by the Environment Court in GWRC v Adams (Decision 025 2022).	Allow
FS5.2	Gerald Keown _Mangaroa Peatland Focus Group	S52.003	Policy 18: Protecting and restoring ecological health of water bodies – regional plans	Support	This amendment to remove the words "and their restoration is promoted" should be allowed. The concept of restoration (including to what prior state) is not sufficiently defined and GWRC has previously failed to appropriately identify the extent of existing natural wetlands, as demonstrated in the findings of the Environment Court in GWRC v Adams (Decision 025 2022).	Allow
FS5.3	Gerald Keown _Mangaroa Peatland Focus Group	S52.005	Nature-based solutions	Support	This submission to delete the example of "protecting peatland to retain carbon stores" from the definition of Nature-Based Solutions should be allowed. I understand from neighboring residents that the Mangaroa Peatland Hazard Overlay proposed by Upper Hutt City Council has not been adequately ground proven and previous enforcement actions sought by Greater Wellington Regional Council in relation to the Mangaroa Peatland have been declined by the Environment Court in Adams v Others (2022 Decision 025). In this context the inclusion of a specific peatland example in this otherwise very broad definition is unnecessarily contentious.	Allow
FS5.4	Gerald Keown _Mangaroa Peatland Focus Group	S52.006	Restoration	Support	In my other further submission points I have supported the removal of references to concepts of restoration - in large part due to the difficulty of establishing and agreeing the desired former state. If concepts of restoration are to be retained the Council should allow this submission to insert a requirement for specific community and expert consultation so that the	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
					desired former state for any relevant habitat, ecosystem, landform or landscape is defined and informed by a range of relevant perspectives.	
FS5.5	Sarah (Dr) Kerkin	S96.008	Climate change introductory text	Support	This amendment to remove the words "and restore" should be allowed. The concept of restoration (including to what prior state) is not sufficiently defined and is particularly problematic in the context of the enforcement actions declined by the Environment Court in GWRC v Adams (Decision 025 2022).	Allow
FS5.6	Sarah (Dr) Kerkin	S96.014	Policy 18: Protecting and restoring ecological health of water bodies – regional plans	Support	Council should allow this submission to make restoration of wetlands a non-regulatory provision, or be clear that restoration applies only to remaining natural wetlands and not to areas like the historic Mangaroa Peatland that cease to be natural wetlands and are now used for other activities. The concept of restoration (including to what prior state) is not sufficiently defined and GWRC has previously failed to appropriately identify the extent of existing natural wetlands, as demonstrated in the findings of the Environment Court in GWRC v Adams (Decision 025 2022).	Allow
FS5.7	Sarah (Dr) Kerkin	S96.022	Nature-based solutions	Support	This submission to delete the example of "protecting peatland to retain carbon stores" from the definition of Nature-Based Solutions should be allowed. I understand from neighboring residents that the Mangaroa Peatland Hazard Overlay proposed by Upper Hutt City Council has not been adequately ground proven and previous enforcement actions sought by Greater Wellington Regional Council in relation to the Mangaroa Peatland have been declined by the Environment Court in Adams v Others (2022 Decision 025). In this context the inclusion of a specific peatland example in this otherwise very broad definition is unnecessarily contentious.	Allow
FS5.8	Sarah (Dr) Kerkin	S96.024	Restoration	Support	In my other further submission points I have supported the removal of references to concepts of restoration - in large part due to the difficulty of establishing and agreeing the desired former state. If concepts of restoration are to be retained the Council should allow this submission to specify the components of the definition so it can be meaningfully understood and consistently applied. Consult with the community on the redrafted definition	Allow

FS Point Number	Original submitter	Related submission point	Plan provision	Support / Oppose	Reasons	Decision requested
					to promote its legitimacy. It is critical to the interpretation of the proposed Climate Change Introductory Text and Policy 18 that the desired former state for any relevant habitat, ecosystem, landform or landscape is defined and informed by a range of relevant perspectives.	

To Greater Wellington Regional Council

This is a further submission on the Greater Wellington Regional Policy Statement Plan Change 1

Further Submitter Details

Date: 16 December 2022

Organisation Name: Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira

Postal address: Level 2, 1 Cobham Court, Porirua

Contact Person: Onur Oktem Lewis

Phone: 027 772 5182

Email: Onur.Oktem@ngatitoea.iwi.nz

We would like our address for service to be our email.

We would like to be heard in support of our further submission.

If others make a similar submission, we will not consider presenting a joint case with them at a hearing.

We are submitting as persons who have interest in the proposal that is greater than the interest the general public has because we are recognised as tangata whenua in Te Whanganui a Tara rohe.

Submitter Name/ Submission Number	Submitter Address/ Email	Support or Oppose	The particular part of the submission we support or oppose are:	The reasons for our support or opposition are:	Allow or Disallow	We seek that the whole or part of the submission be allowed or disallowed:
Kāpiti Coast District Council Submission 16.079	Jason.holland@kapiticoast.govt.nz	Support	The submitter seeks for Policy UD.1 in Chapter 4.1 to be amended so that tangata whenua must demonstrate ancestral connection to their land.	We support this submission because the suggested amendments are consistent with the KCDC papakāinga provisions, which we have worked in partnership with tangata whenua and council.	Allow	We seek that this part of the submission is allowed.
Te Kaunihera o Te Awa Kairangi Upper Hutt City Council Submission 34.094	Peter.kelly@uhcc.govt.nz	Support	The submitter considers amendment to read: "Policy UD.2 supports Māori to express their cultural traditions and norms in land use and development. This includes recognising taonga and sites and areas of significance, awa and moana and important places to where mana whenua/ tangata still practice mātauranga in accordance with Mātauranga Māori" The submitter also considers the role of urban Māori and how they are presented within the objective and policy.	We support these suggested amendments as it uses stronger language to support the use of mātauranga Māori in recognising sites of significance to mana whenua/ tangata whenua.	Allow	We seek that this part of the submission is allowed.
Te Tumu Paeroa Office of the	Dougal.morrison@tetumupaeroa.co.nz	Support	The submitter supports Policy 17 in Chapter 4.1 and its implementation	We support this submission because papakāinga should be considered in the take	Allow	We seek that this part of the submission is allowed.

Māori Trustee Submission 102.046			through regional plans, and the review of water allocation plans. However, considers that "papakāinga" should be added to point (d), to ensure water can be provided.	and use of water for the health needs of people.		
Te Tumu Paeroa Office of the Māori Trustee Submission 102.092	Dougal.morrison@tetumupaeroa.co.nz	Support	The submitter generally supports Method IM.2 for 'Integrated management' in Chapter 4.5. However, considers that the methods of implementation of Method IM.2 should be alongside mana whenua/tangata whenua. This will ensure that mātauranga Māori and Māori data sovereignty is protected and interpreted as intended.	We support this submission mana whenua/ tangata whenua will need to be implementing the protection and interpretation of mātauranga Māori to protect data sovereignty in accordance with tikanga.	Allow	We seek that this part of the submission is allowed.
Te Tumu Paeroa Office of the Māori Trustee Submission 102.093	Dougal.morrison@tetumupaeroa.co.nz	Support	The submitter opposes the removal of "Papakāinga" from Appendix 3: Definitions. The submitter suggests amending the "Papakāinga" definition following further consultation with iwi, hapu and Māori landowners to include reference to residential accommodation, communal buildings, and facilities for iwi, hapu and/or Māori landowners who whakapapa to the area.	We support this submission because there should be a definition of papakāinga with the Regional Policy Statement and this should be developed alongside mana whenua/ tangata whenua.	Allow	We seek that this part of the submission is allowed.
Wellington Water Submission 113.005	Angela.penfold@wellingtonwater.co.nz	Oppose	The submitter discusses that if it is necessary to keep the iwi statements intact, then they should not sit within Objective 12 of Chapter 3.4. They should be housed elsewhere within the RPS in a manner that makes clear how their variety of content types (objectives, policies, statements of issues and so on) are to be applied relative to other parts of the RPS.	We oppose this submission because we consider it appropriate that the mana whenua statements are kept in the freshwater chapter as they are specifically in relation to Te Mana o te Wai. We oppose this submission also because 'elsewhere' is not appropriate and that the statements are clear as to RPS intention.	Disallow	We seek that this part of the submission is disallowed.
Wellington Water Submission 113.048	Angela.penfold@wellingtonwater.co.nz	Support	The submitter suggests inserting a new Method 57 to Chapter 4.5: Develop and implement a wastewater management strategy, in partnership with mana whenua/tangata whenua and in collaboration with territorial authorities and water infrastructure providers. The strategy shall: <ul style="list-style-type: none"> • Recognise the 100 year journey to improve water quality • Set out how to achieve Te Mana o te Wai when managing wastewater • Recognise that the journey may look different in different whaitua or for different mana whenua 	We support this submission as the suggested method of developing and implementing a wastewater strategy in partnership with mana whenua will support the aspirations and values of mana whenua in relation to wastewater management.	Allow	We seek that this part of the submission is allowed.

			groups• Be informed by the WIPs and associated documents from mana whenua groups (eg Te Mahere Wai or iwi statements)• Create a framework of priorities and recognise that those priorities will change on the 100 year journey• Result in a planning framework that both implements the NPS- FM and provides appropriate levels of flexibility for this early stage of the 100 year journey.			
Ātiawa ki Whakarongotai Charitable Trust Submission 131.079	taiao@teatiawakikipiti.co.nz admin@teatiawakikipiti.co.nz	Support	The submitter seeks for papakāinga to be provided for not just recognized.	We support this submission as these suggested amendments would better support papakāinga development.	Allow	We seek that this part of the submission is allowed.
Ātiawa ki Whakarongotai Charitable Trust Submission 131.0161	taiao@teatiawakikipiti.co.nz admin@teatiawakikipiti.co.nz	Support	The submitter seeks for a new definition of papakāinga to be included with input from each iwi and hapū.	We support this submission because a new definition for papakāinga is needed and it will need to be developed with each relevant iwi and hapū.	Allow	We seek that this part of the submission is allowed.
Muaūpoko Tribal Authority Submission 133.001, 133.002, 133.017, 133.018, 133.019, 133.021, 133.022, 133.023, 133.024, 133.025, 133.027, 133.028, 133.029, 133.030, 133.031, 133.032, 133.034, 133.035, 133.036, 133.037, 133.038, 133.039,	siobhan@kahuenviro.co.nz	Oppose	The submitter requests that the connection of Muaūpoko with Te Whanganui a Tara is acknowledged and recognized throughout the RPS.	We oppose this submission because as Muaūpoko claims are inappropriate. This not only causes confusion around which iwi are Tangata Whenua in Te Whanganui a Tara rohe and which iwi to engage with, but also portrays a false perception of who the mana whenua are, which is also inappropriate.	Disallow	We seek that this part of the submission is disallowed.

133.040, 133.051, 133.072, 133.076						
Muaūpoko Tribal Authority Submission 133.020	siobhan@kahuenviro.co.nz	Oppose	The submitter requests that a process for consultation with Muaūpoko for indigenous biodiversity identification is included.	We oppose this submission because Muaūpoko is not Tangata Whenua in Te Whanganui a Tara.	Disallow	We seek that this part of the submission is disallowed.
Wellington International Airport Ltd Submission 148.013	Clair.hunter@mithcelldaysh.co.nz	Oppose	The submitter states that the expression 'Te Ao Māori' is not defined for the purposes of Objective A in Chapter 3, and it is not clear what guidance it will provide (or require). They request either defining or providing sufficient methodologies to support the intent of this objective or to delete it.	We oppose this submission as this objective should not be deleted.	Disallow	We seek that this part of the submission is disallowed.
Wellington International Airport Ltd Submission 148.054	Clair.hunter@mithcelldaysh.co.nz	Oppose	The submitter requests to amend policy UD.2 in Chapter 4.2 and explanation to clarify how it will be implemented as follows: When considering an application for a resource consent, notice of requirement, or a plan change of a district plan for use or development, regard shall be had to whether there is any opportunity to support Māori in being able to express their culture and tradition through the proposal. This includes recognizing taonga and sites and areas of significance, awa and moana and important places where mana whenua /tangata whenua still practice mātauranga.	We oppose this submission because the requested amendments use weak language and disadvantage Tangata Whenua interests in the RPS by doing so.	Disallow	We seek that this part of the submission is disallowed.
Kāinga Ora Homes and Communities Submission 158.001, 158.044	developmentplanning@kaingaora.govt.nz	Oppose	The submitter seeks for Chapter 4.2 Matters of Consideration to be deleted from the Regional Policy Statement in full OR in the alternative that this relief is not granted, seek that the policies are reworded to state the intended outcome such that regional and district plans giving effect to the regional policy statement are suitably informed of the desired outcomes to address identified resource management issues.	We oppose this submission because this chapter gives effect to the National Policy Statement on Urban Development and the National Policy Statement for Freshwater Management. This chapter has important provisions in relation to Te Mana o te Wai, mana whenua/ tangata whenua roles and values and mātauranga Māori.	Disallow	We seek that this part of the submission is disallowed.
Kāinga Ora Homes and Communities	developmentplanning@kaingaora.govt.nz	Oppose	The submitter requests to amend sub-point (f) as follows:(f) responds effectively to the current and future pressures of climate change, population growth and	We oppose this part of the submission as the suggested amendment uses weak language and disadvantage Tangata Whenua interests in the RPS by doing so.	Disallow	We seek that this part of the submission is disallowed.

Submission 158.003			development. (f) is resilient to the likely current and future effects of climate change.			
Kāinga Ora Homes and Communities Submission 158.009	developmentplanning@kaingaora.govt.nz	Oppose	Amend the objective as follows: Iwi and hapū are empowered to make decisions to achieve climate-resilience in their communities. Land use, development and subdivision on Māori land is resilient to the likely current and future effects of climate change.	We oppose this part of the submission as the suggested amendment uses weak language and disadvantage Tangata Whenua interests in the RPS by doing so.	Disallow	We seek that this part of the submission is disallowed.
Kāinga Ora Homes and Communities Submission 158.027, 158.049	developmentplanning@kaingaora.govt.nz	Oppose	The submitter seeks for urban intensification to be enabled as much as possible.	We oppose the submitters request to increase development capacity for the sake of development and at the expense of Taiao; it is inappropriate for further intensification to take place. Further intensification and increased height controls further intensify the impacts of development on the environment, wellbeing and cultural values. Development needs to be in accordance with cultural values and have minimal impact on te taiao. It is also unclear how this level of intensified development would be managed in order to avoid adverse effects on the natural environment.	Disallow	We seek that this part of the submission is disallowed.
Kāinga Ora Homes and Communities Submission 158.036	developmentplanning@kaingaora.govt.nz	Oppose	The submitter supports that design guidance is stipulated as a non-statutory method and seeks that development manuals and design guides should not be a requirement, but only implemented where considered appropriate by District Councils as non-statutory documents.	We oppose this part of the submission as some design guides are underpinned by kaupapa Māori and reflects tangata whenua interests in development. It is important an iwi design guide, developed by iwi and Māori should have legal teeth and this should be made clear when the development proposals are lodged as part of the resource consents.	Disallow	We seek that this part of the submission is disallowed.
Taranaki Whānui Submission 167.008	lee@portnicholson.org.nz	Support	The submitter requests for a new clause to be inserted in Chapter 3 Objective A as follows: (a) works in partnership with mana whenua/ tangata whenua.	We support this submission as supporting partnership with tangata whenua in an overarching objective will strengthen provisions for partnership.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.010	lee@portnicholson.org.nz	Support	The submitter requests for this to be included at the end of paragraph one in Chapter 3.1A: Mana whenua/ tangata whenua of this region have long had concerns regarding climate change and its impacts. Despite contributing the least to greenhouse gas emissions, mana whenua/ tangata whenua will bear the brunt of climate change.	We support this submission because it is important to recognise and spread awareness of the position of mana whenua/ tangata whenua in regards to climate change throughout the plan.	Allow	We seek that this part of the submission is allowed.

Taranaki Whānui Submission 167.011	lee@portnicholson.org.nz	Support	The submitter requests adding an acknowledgement that SASMs are traditionally near the coast and therefore are at higher risk of being impacted by climate change and rising sea levels.	We support this submission as it is important to recognise the impacts on sites of significance to Māori and how they may be impacted by climate change, so that we can plan their protection.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.026	lee@portnicholson.org.nz	Support	The submitter requests that an overarching objective is added to Chapter 3.1A to support work in partnership with mana whenua in tackling climate change.	We support this submission because working in partnership with mana whenua in relation to climate change will ensure that our aspirations and values are upheld.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.027	lee@portnicholson.org.nz	Support	The submitter suggests strengthening tangata whenua's input in energy, infrastructure, and waste related issues.	We support this submission because this will support our aspirations for energy, infrastructure, and waste related issues.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.039	lee@portnicholson.org.nz	Support	The submitter requests amending Objective 16B in Chapter 3.6 to read: ..., and mana whenua/ tangata whenua are supported and resourced to exercise their kaitiakitanga for indigenous biodiversity.	We support this submission as the suggested amendments support resourcing mana whenua/ tangata whenua which will be very valuable for exercising kaitiakitanga and building the capacity to protect indigenous biodiversity.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.043	lee@portnicholson.org.nz	Support	The submitter requests that a description is added to Chapter 3.8 which discusses the impacts of natural hazards on mana whenua and their areas of significance.	We support this submission as it is important to recognise the impacts on sites of significance to Māori and how they may be impacted by climate change, so that we can plan their protection.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.049	lee@portnicholson.org.nz	Support	The submitter suggests including specific objectives in relation to partnering with mana whenua in the protection of iwi/ hapū against natural hazards.	We support this submission because mana whenua should be partnered with in matters such as natural hazards to ensure their aspirations are upheld.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.051	lee@portnicholson.org.nz	Support	The submitter requests inserting a sentence in paragraph 2 of Chapter 3.9 as follows: well-functioning urban environments provide for the cultural visibility of mana whenua / tangata whenua to be incorporated, integrated, and expressed through design guides and opportunities.	We support this submission because it supports the visibility of mana whenua / tangata whenua throughout the design of our rohe. This will support awareness of our presence.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.085	lee@portnicholson.org.nz	Support	The submitter requests that Chapter 4.1 clause (c) to read: c) provide for partner with mana whenua / tangata whenua and to provide for their relationship with their culture, land, water, wāhi tapu and other taonga.	We support this submission because it uses stronger language than the proposed language. Partnership is a more beneficial and tangible way to support mana whenua/ tangata whenua.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.089	lee@portnicholson.org.nz	Support	The submitter requests for clause (d) to be inserted into Chapter 4.1 as follows: (d) protect ecosystems and habitats that contains characteristics of special	We support this submission because the suggested amendments will provide stronger protection for ecosystems and habitats of significance to mana whenua/ tangata whenua.	Allow	We seek that this part of the submission is allowed.

			spiritual, historical or cultural significance to mana whenua/ tangata whenua.			
Taranaki Whānui Submission 167.096	lee@portnicholson.org.nz	Support	The submitter requests for Chapter 4.2 Policy IM.1 clause (d) to be amended to read: (d) making decisions based on achieving outcomes set in partnership with mana whenua/ tangata whenua and using the best available information, improvements in technology and science, and mātauranga Māori.	We support this submission because decisions cannot be made just based on mātauranga Māori, as the use of mātauranga Māori is required to be done by those who hold the mātauranga (mana whenua/ tangata whenua). Therefore, partnership is required with mana whenua/ tangata whenua in order for mātauranga Māori to be included in decisions.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.0103, 167.108, 167.0111, 167.0114	lee@portnicholson.org.nz	Support	The submitter requests that a new clause is inserted in Policy CC.14 Chapter 4.2 to read: (x) partnering with mana whenua/ tangata whenua in resource management and decision making.	We support this submission because this will enable better partnership in relation to climate resilient urban areas. This will also mean that mana whenua/ tangata whenua aspirations are upheld.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.0154	lee@portnicholson.org.nz	Support	The submitter requests that Chapter 4.5 clause (c) is amended to read: (c) partner where practicable assisting with mana whenua/ tangata whenua in the development of iwi climate change adaptation plans.	We support this submission as iwi climate change adaptation plans are a way for iwi to uphold their aspirations and values in the face of this major environmental issue. These plans should also be recognised by councils and supported.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.0194	lee@portnicholson.org.nz	Support	The submitter requests that the definition of marae is amended with input from each iwi and hapū.	We support this submission as the definition of marae should be developed with input from the relevant iwi and hapū.	Allow	We seek that this part of the submission is allowed.
Taranaki Whānui Submission 167.0195	lee@portnicholson.org.nz	Support	The submitter requests that the definition of papakāinga is amended with input from each iwi and hapū.	We support this submission because a new definition for papakāinga is needed and it will need to be developed with each relevant iwi and hapū.	Allow	We seek that this part of the submission is allowed.
Rangitāne o Wairarapa Submission 168.027	amber@rangitane.iwi.nz	Support	The submitter seeks strengthened policies and methods that provide for the occupation, use, development, and ongoing relationship of tangata whenua with their ancestral land.	We support this submission because strengthened policies and methods for the relationship of tangata whenua with their ancestral land will better support these relationships.	Allow	We seek that this part of the submission is allowed.
Rangitāne o Wairarapa Submission 168.0181	amber@rangitane.iwi.nz	Support	The submitter states that the clause only needs to refer to partnering (as this is the same as working together). The amendment of subclause (d) to substitute "encouraging" with "providing for" and the inserted reference to meeting "cultural" needs along with social and economic needs is supported.	We support this submission because the suggested amendments use stronger language than that proposed in the policy statement. These suggested amendments also discuss making reference to partnership more consistent, rather than referring to it as just working together.	Allow	We seek that this part of the submission is allowed.



Forest & Bird

TE REO O TE TAIAO | *Giving Nature a Voice*

Further Submission – Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region

Clause 8 of the First Schedule, Resource Management Act 1991

19 December 2022

To: Greater Wellington Regional Council
regionalplan@gw.govt.nz

From: Royal Forest and Bird Protection Society (Forest & Bird)
Amelia Geary – Regional Manager, Lower North Island
a.geary@forestandbird.org.nz
022 039 9363

This is a further submission in support of, or in opposition to, submissions on proposed plan change one to the Regional Policy Statement for the Wellington Region.

I am making this submission on behalf of Forest & Bird.

Forest & Bird wishes to be heard in support of this submission.

If others make a similar submission, Forest & Bird will consider presenting a joint case with them at a hearing.

Forest & Bird represents relevant aspects of the public interest. Forest & Bird has been around since 1923 and is New Zealand's largest independent conservation organisation with over 80,000 members and supporters.

FURTHER SUBMISSION

Submitter name or, Submitter number of the submission you are commenting on:	Submission point number: <i>Identified in the summary of decisions requested table</i>	Stance on the submission point: (Support, Oppose, Support in part, or Oppose in part)	Reasons: Why you support or oppose this point	Decision sought: (Allow, Disallow, Allow in part, or Disallow in part) Identify the whole or part(s) of the submission point that this is in reference to
S58 Mangaroa Peatland Focus Group_Grant Munro	S52.002	Oppose	The term restore applies to natural ecosystems beyond just peatland. Restoration of natural ecosystems, alongside other actions, is an entirely appropriate response to climate change.	Disallow deletion sought.
S58 Mangaroa Peatland Focus Group_Grant Munro	S52.003	Oppose	The amendment sought fails to give effect to Policy 6 of the NPS-FM 2020.	Disallow whole submission point.
S58 Mangaroa Peatland Focus Group_Grant Munro	S52.004	Oppose	The concept of buffering, amendment to its definition and rules that apply to a buffer zone is out of scope of this plan change.	Disallow whole submission point.
S58 Mangaroa Peatland Focus Group_Grant Munro	S52.005	Oppose	This is just an example within a definition. Nature based solutions are enshrined in New Zealand's Emissions Reduction Plan and National Adaptation Plan which this plan change is giving effect to.	Disallow whole submission point.
S58 Mangaroa Peatland Focus Group_Grant Munro	S52.006	Oppose	The definition of restoration is necessarily broad to cover the range of habitats and ecosystems that could be subject to restoration. The relief sought to require consultation and approval from every community is unreasonable.	Disallow whole submission point.
S148 Wellington International Airport Ltd (WIAL)	S148.017	Oppose	We appreciate the complexity of the national policy direction in relation to aviation. However, the amendments sought won't achieve overall regional benefit and don't give effect to the Climate Change Response (Zero Carbon) Amendment Act 2019, the latest science from the IPCC, the National Emissions Reduction Plan and the National Adaptation Plan.	Disallow whole submission point.
S148 Wellington International Airport Ltd (WIAL)	S148.018	Oppose	The amendment sought fails to give effect to the Emissions Reduction Plan and the National Adaptation Plan which emphasises the prioritisation of nature-based solutions as a critical action to facilitate adaptation options.	Disallow insertion of Where practicable.
S148 Wellington International Airport Ltd	S148.019	Oppose	It's not clear that this is the appropriate policy to include infrastructure as infrastructure and RSI is covered elsewhere in the	Disallow insertion of infrastructure into the

(WIAL)			RPS.	policy.
S148 Wellington International Airport Ltd (WIAL)	S148.020	Support in part	This proposed amendment appears reasonable. We do not support the deletion of the objective.	Allow amendment.
S148 Wellington International Airport Ltd (WIAL)	S148.023	Oppose	This qualifier significantly weakens the objective and fails to give effect to the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow whole submission point.
S148 Wellington International Airport Ltd (WIAL)	S148.024	Oppose	It is not appropriate for the airport and aviation industry to be exempt from the requirement to prioritise reducing emissions over offsetting.	Disallow whole submission point.
S148 Wellington International Airport Ltd (WIAL)	S148.025 - S148.029	Oppose	It is not appropriate for the airport and aviation industry to be exempt from these policies.	Disallow all these submission points.
S148 Wellington International Airport Ltd (WIAL)	S148.039	Oppose	Amendments sought do not give effect to s6 of the RMA.	Disallow whole submission point.
S148 Wellington International Airport Ltd (WIAL)	S148.040	Oppose	Policy 23 is an existing policy and there is no evidence that it has been used in the way expressed by WIAL. This policy needs to be retained to give effect to s6 of the RMA.	Disallow whole submission point.
S162 Winstone Aggregates	S162.001	Oppose	It is not clear what the, if any, environmental benefits of the utilisation of mineral and aggregates resources are. Provision of a clear consenting pathway for this extractive industry is not a requirement of the RMA and should be addressed using the appropriate RMA process as laid out in the legislation and higher order planning instruments.	Disallow whole submission point.
S162 Winstone Aggregates	S162.002	Oppose in part	We are concerned at the uncertainty of the provisions being requested. As above, this should be addressed using due process.	Disallow submission point.
S162 Winstone Aggregates	S162.007	Oppose in part	We acknowledge the wording of Policy 7 (The loss of river extent and values is avoided to the extent practicable) in the NPS-FM. However, Policy 18, as interpreted by (e), is appropriate.	Disallow amendment to (e).
S162 Winstone Aggregates	S162.008	Oppose	Policy 23 is an existing policy. It is not clear how mineral mapping is relevant to the interpretation of this policy. It is not clear how the submitter proposes the policy should be amended to update the defined terms mentioned.	Disallow submission point.
S162 Winstone Aggregates	S162.009	Oppose in part	Accept this policy could be improved however rejecting all proposed amendments would not achieve the purpose of the RMA.	Disallow submission point.

S162 Winstone Aggregates	S162.010 - S162.012	Oppose	Recognition of mineral resources is not an explicit requirement of the RMA.	Disallow all these submission points.
S162 Winstone Aggregates	S162.016	Oppose	The amendment sought is not a requirement of the RMA.	Disallow submission point.
S162 Winstone Aggregates	S162.018	Oppose	Deletion of Appendix 1A is not appropriate.	Disallow submission point.
S162 Winstone Aggregates	S162.037	Oppose	Recognition of mineral resources is not an explicit requirement of the RMA.	Disallow submission point.
S163 Wairarapa Federated Farmers	Whole submission	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow whole submission.

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

Who can make a Further Submission:

A further submission may only be made by a person who:

- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

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- Email your Further Submission and this completed form to: regionalplan@gw.govt.nz
- Post your Further submission and this completed form to: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser. **N.B. Due to delays in postal services and the timeframe for making Further Submissions we highly recommend that an electronic copy of your Further Submission is provided by the closing date OR delivered to one of our offices.**
- Drop your Further Submission and this completed form to reception at one of Greater Wellington's offices.

(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter	
Name (First and Last) OR Organisation / Company: Guardians of the Bays Inc _____	
Address for Service (Email OR Postal Address): 1 4 3 Queens Drive, Lyall Bay, Wellington 6022 Phone: _____ 027225390	
Contact name and postal address for service of person making submission: <u>Yvonne Weeber 143 Queens Drive, Lyall Bay, Wellington 6022</u>	
(If different from above)	
Only certain people may make further submissions Please tick the option that applies to you:	
<input checked="" type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input type="checkbox"/>	I am the local authority for the relevant area.

Specify below the grounds for stating that you are within the category you have ticked:

Guardians of the Bays (GOTB) is an incorporated society that represents concerned Wellington residents working to reduce the adverse effects that arise from Wellington airport on an isthmus surrounded by either sea or predominately residential neighbourhoods. GotB objectives are to reduce the adverse effects that arise from Wellington airport including proposed runway extensions, expansions, increased aircraft and land transport movements and other related activities on the environment. The adverse effects may include but are not limited to coastal reclamation, emissions, noise, stormwater, reduction of visual and landscape amenity and neighbourhood disruption.

2. Appearance at hearing Please select from the following:

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
<input checked="" type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearing

3. For the further submitter to action

Service of your further submission:

Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**

Each submitter has an address for service available at: <https://www.gw.govt.nz/rps-pc-1-submissions>

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: _____



Date: 19 December 2021 _____

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

All Further Submissions (including name and address for service) are made publicly available on our website. Your name and address for service will be used for correspondence during the hearing process. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

Please enter further submission points in the table on the following pages

4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

Submitter name or, Submitter number of the submission you are commenting on:	Submission point number: <i>Identified in the summary of decisions requested table</i>	Stance on the submission point: (Support, Oppose, Support in part, or Oppose in part)	Reasons: <i>Why you support or oppose this point</i>	Decision sought: (Allow, Disallow, Allow in part, or Disallow in part) <i>Identify the whole or part(s) of the submission point that this is in reference to</i>
S165 Forest and Bird	S165.003	Support	The wording change to Objective CC.1 from low to zero is in alignment with the Climate Change Response Act 2002 which requires all greenhouse gases, other than biogenic methane, to reach net zero by 2050. Therefore by 2050 the Wellington Regions should be a zero emissions and climate resilient region.	Allow
S148 WIAL	S148.006	Oppose	Guardians of the Bays considers the RPS should promote biodiversity and natural habitats that infrastructure providers such as WIAL are placed within. Biodiversity should not be feared but considered and enhanced in all projects in and around Wellington Airport.	Disallow
S148 WIAL	S148.039	Oppose	Guardians of the Bays supports the proposed wording of Plan Change 1 Objective 16: <u>Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are maintained-protected, enhanced, and restored to a healthy functioning state.</u> The WIAL proposed wording would water down this key objective. WIAL's fear of biodiversity and the coastal environment, that Wellington Airport has been placed in, should not stop	Disallow

			protection and enhancement of indigenous ecosystems and habitats particularly in relationship to airport seawall maintenance.	
S151 NZ Centre for Sustainable Cities	S151.016	Support	Objective 16 should be supported by related policies or methods to enhance and restore significant ecosystem functions.	Allow
S165 Forest and Bird	S165.021	Support	Objective 16 needs to include protection of significant habitats which could be exotic for indigenous fauna e.g. in the Lyall Bay and area Tui are feed on nectar from bottle brush and banksias.	Allow
S148 WIAL	S148.021	Oppose	Transportation needs to include all transport modes including aviation. The only way we can achieve zero emissions in the aviation industry is to proactively look for alternatives now rather than in 30 years time.	Disallow
S148 WIAL	S148.022	Oppose	Wellington Airport creates a large amount of private vehicle, taxi, uber, public transport, freight and construction traffic. Wellington Airport needs Travel Demand Management Plans for its development and new facilities located in the airport. Wellington Airport needs to embrace zero and low carbon multi modal transport options.	Disallow
S148 WIAL	S148.031	Oppose	The changes proposed would remove Wellington Airport from being a regionally significant infrastructure carbon emitter. Wellington Airport is not a public health and safety provider and does not need to be added to Policy 7 (a)(iii)	Disallow
S148 WIAL	S148.034	Oppose	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan -People living without a private vehicle should be the normal situation rather than something to be worry about by a aviation infrastructure provider. Travel to Wellington Airport should not be done solely by a private vehicle. The majority of users	Disallow

			coming to the airport should be able to come by public transport, cycling and walking.	
S148 WIAL	S148.040	Oppose	There shouldn't be limitations on a broad framework of significant areas in the region due to the aviation industry. A RPS on biodiversity can be incorporated in the future into Policy 23 Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values.	Disallow
S148 WIAL	S148.041	Oppose	Policy 24 Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values is not inappropriate and needs to be retained.	Disallow
S148 WIAL	S148.014	Oppose	We note that clarity, refinement and methods are mentioned by other submitters as a way of improving Policy Policy IM.2: Equity and inclusiveness, rather than removal. Clearly it is an important policy to Taranaki Whanui and Rūnanga o Toa Rangatira that should be retained.	Disallow
S148 WIAL	S148.025	Oppose	Wellington Airport and the aviation industry with both is aviation and land based transport should not be removed from Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure. The air transport should be included in greenhouse emissions.	Disallow
S148 WIAL	S148.026	Oppose	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions – should contain stronger direction and link to specific reduction targets rather than being amended or deleted because of air transport freight.	Disallow
S165 Forest and Bird	S165.064	Support	The amendments are supported in giving stronger direction in reducing greenhouse gas emissions.	Allow
S148 WIAL	S148.027	Oppose	Adaption of the aviation industry needs to include a whole of life carbon emissions assessment now. The Aviation industry is not	Disallow

			adapting rapidly enough. NOR's can be adapted to contemplate and detail Policy CC.11: Encouraging whole of life carbon emissions assessment	
S148 WIAL	S148.028	S148 WIAL	Policy CC.12: Protect, enhance and restore ecosystems that provide nature based solutions to climate change should be retained. We support strengthening this policy	Disallow
S165 Forest and Bird	S165.066	Support	Support stronger policy direction and the removal of wording proposed by Forest and Bird.	Allow
S148 WIAL	S148.029	Oppose	Policy CC.14: Climate resilient urban areas needs to include Wellington Airport. Other airports in New Zealand e.g. Auckland airport clearly create green spaces around the airport which are not an aviation hazard. In fact stormwater ponds at Auckland Airport are used to lead birds away from the runway.	Disallow
S148 WIAL	S148.035	Oppose	Oppose the deletion of the wording to Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure.	Disallow
S165 Forest and Bird	S165.068	Support	Support link between reduction in greenhouse gas emission to targets in Objective CC.3	Allow
S148 WIAL	S148.048	Oppose	Supports policies such as Policy 51: Minimising the risks and consequences of natural hazards - surrounding effective management and measures for climate change and climate change effects especially for regionally significant infrastructure such as Wellington Airport. There could be a time when climate change adaptation and even retreat will be required by Wellington Airport buildings and even the airport itself.	Disallow
S165 Forest and Bird	S165.075	Support	Support Policy 51 rewording proposed by Forest and Bird as this needs to be consistent with the NZCPS.	Allow

S148 WIAL	S148.049	Oppose	Policy 52: Minimising adverse effects of hazard mitigation measures. We support the first preference should always be to avoid hard structures in the coastal environment. In Lyall Bay the sand dunes are the first protection in stopping sea surges and storm events. Hard infrastructure is always going to be a poor second defense to raisings sea levels and storm events.	Disallow
S148 WIAL	S148.053	Oppose	Wellington Airport which is a major traffic generator should always be considering the public transport network and how to enhance its connection to it. We support Policy 58: Coordinating land use with development and operation of infrastructure -relating to Wellington Airport and its developments.	Disallow
S148 WIAL	S148.043	Oppose	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation should include important marine plants such as giant kelp, similar to a tall tree forest on the land.	Disallow

Add further pages as required

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



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- (All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter

Name (First and Last) OR **Organisation / Company**: Wairarapa Water Users Society

Address for Service (Email OR Postal Address): wairarapawaterusers@gmail.com

Phone: 021 638 629

Contact name and postal address for service of person making submission: Geoff Copps. P O Box 920, Masterton

(If different from above)

Only certain people may make further submissions Please tick the option that applies to you:

<input checked="" type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input type="checkbox"/>	I am the local authority for the relevant area.

Specify below the grounds for stating that you are within the category you have ticked:

Wairarapa Water Users Society has around 60 members who are rural water users who produce food and beverage products predominantly for human consumption

2. Appearance at hearing Please select from the following:

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
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Service of your further submission:

wairarapawaterusers@gmail.com

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Signature: **Geoff Copps**

Date: **19 December 2022**

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

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Beef + Lamb NZ	S78.001	Support	The removal of the provisions related to Climate Change, Biodiversity and Fresh Water and only addressing the provisions to give effect to the NPS-UD will allow the other topics to be consulted on in more depth in a process separate to the RPS change 1.	Only retain elements in the RPS change 1 that give effect to the NPS-UD
	S78.002	Support	<u>Policy FW.7: Water attenuation and retention – non-regulatory</u> Promote and support water attenuation and retention including: (a) nature based solutions including slowing water down in the landscape and increasing groundwater recharge (riparian management, wetland enhancement/restoration, flood management); and (b) built solutions including storage at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds).	Retention of total Policy FW.7 to be more consistent with other work being conducted by GWRC and community outside the RPS change 1
Dairy NZ	S136.001	Support	The removal of the provisions related to Climate Change, Biodiversity and Fresh Water and only addressing the provisions to give effect to the NPS-UD will allow the other topics to be consulted on in more depth in a process separate to the RPS change 1.	Only retain elements in the RPS change 1 that give effect to the NPS-UD
	S136.017	Support	Addressing the implementation of Te Mana o te Wai in a more appropriate timeframe will lead to a better outcome.	Remove Policy 44
	S136.019	Partial Support	Given the importance of the FW provisions, formally stating that a collaborative approach will be undertaken will help to include all relevant viewpoints.	Retain FW.7 with the addition of an explicit reference to adopting a collaborative approach that includes the regulator, community and iwi to the extent they wish to be involved to setting implementation FW plans and tools to be consistent with the NPS Freshwater provisions.

	S136.021	Partial Support	Given the importance of the FW provisions, formally stating that a collaborative approach will be undertaken will help to include all relevant viewpoints.	Retain Method 48 with the addition of an explicit reference to adopting a collaborative approach that includes the regulator, community and iwi to the extent they wish to be involved to setting implementation FW plans and tools to be consistent with the NPS Freshwater provisions.
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Wairarapa Federated Farmers	S163.001	Support	The removal of the provisions related to Climate Change, Biodiversity and Fresh Water and only addressing the provisions to give effect to the NPS-UD will allow the other topics to be consulted on in more depth	Only retain elements in the RPS change 1 that give effect to the NPS-UD
	S163.083	Support	That due recognition is given to the community driven processes that resulted in the Ruamahanga Whaitua Implementation Plan and the Wairarapa Water Resilience Strategy	That the wording of Policy FW7 is amended to include references to the RWIP and the WWRS. These work programs and recommendation presented to GWRC that have included in their development the regulator, community and iwi to the extent they wish to be involved are consistent with the requirements for implementation of FW plans and as set out in the NPS Freshwater provisions.
Horticulture NZ	S128.013	Support	Recognition of the value to the community of highly productive land that allows food production	Add "The region also includes highly productive land, a finite resource which has long-term values for land-based primary production, including for food security."
	S128.018	Partial support	Support for the need to highlight the value of highly productive land but needs to link that with access to water	Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features identified in this RPS and highly productive land are managed effectively. This includes appropriate access to fresh water to enable the value of HPL class to be realised.
	S128.033	Support	All forms of water storage should be supported in both urban and rural environments including in-channel and at all sizes. The consenting process should be used to limit developments from having excessive negative effects. At the level of the RPS, all options should be on the table to mitigate Climate Change and produce food for human consumption.	As requested by Horticulture NZ
	S128.045	Support	Water storage should be supported in both urban and rural environments and not just urban	As requested by Horticulture NZ with the addition of wording to include both urban and rural environments.

IrrigationNZ	S86.001	Support	The importance of primary industries to serve the needs of the human population must be recognised	Amend to better reflect the needs of primary industries in the Greater Wellington Region.
	S86.002	Support	The NPS-HPL must be factored into this RPS Review process	Amendment of Policy 44 to give effect to the National Policy Statement on Highly Productive Land 2022 (NPS-HPL).
	S86.005	Support	Water storage at a range of sizes and both in and off channel should be promoted at the RPS level as well as all attenuation methods	Amendment sub-clause (b) of Policy FW.7 to provide further specification of natural and built solutions to attenuate and retain water to provide adequate provision for primary industries. Include references to the RWIP and the WWRS. These work programs and recommendation presented to GWRC that have included in their development the regulator, community and iwi to the extent they wish to be involved are consistent with the requirements for implementation of FW plans and as set out in the NPS Freshwater provisions.
	S86.006	Support	Provides recognition of the community input that resulted in the RWIP and the WWRS	Amend Method 34 to place a greater emphasis on the importance of water storage as part of a resilient regional water supply strategy. This will also be consistent with the recommendations and actions set out in the National Climate Adaptation Plan 2022.

**FURTHER SUBMISSIONS BY THE FUEL COMPANIES ON SUBMISSIONS TO
PROPOSED CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE
WELLINGTON REGION**

To: Greater Wellington Regional Council
Environmental Policy
PO Box 11646, Manners St
Wellington 6142
ATT: Hearings Adviser

Via email: regionalplan@gw.govt.nz

Submitter:	BP Oil New Zealand Limited PO Box 99 873 Auckland 1149	Mobil Oil New Zealand Limited PO Box 1709 Auckland 1140
	Z Energy Limited PO Box 2091 Wellington 6140	

Hereafter referred to as The Fuel Companies

- 1. The Fuel Companies further submissions are as contained in the attached Table.**
- 2. The Fuel Companies are making further submissions as a person that has an interest in the proposal that is greater than the interest of the general public.**
- 3. The Fuel Companies do wish to be heard in support of their further submissions.**
- 4. If others make similar submissions the Fuel Companies may be prepared to consider presenting a joint case with them at any hearing.**

Signature of person authorised to sign on behalf of the Fuel Companies:



Georgina McPherson
Principal Planning and Policy Advisor

Dated at AUCKLAND this 19th day of December 2022

Address for service:

4SIGHT CONSULTING LIMITED
201 Victoria Street West
PO Box 911 310

Attention: Georgina McPherson

Phone: 021 0244 3961

Email: georinam@4sight.co.nz

**FURTHER SUBMISSIONS OF THE FUEL COMPANIES ON
SUBMISSIONS TO PROPOSED CHANGE 1 TO THE WELLINGTON REGIONAL POLICY STATEMENT**

Submitter name / number:	Sub number:	RPS Change 1 Provision	Support or Oppose	Reasons:	Decision sought:
S83 CentrePort Limited	S83.004	Policy 32: Identifying & protecting key industrial based employment locations in district plans	Support	There is a need to provide for industrial activities in appropriate locations and to protect those industrial activities from encroachment by sensitive activities and associated reverse sensitivity effects.	Allow the submission and retain Policy 32 as notified.
S32 Director-General of Conservation	S32.014	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	The Fuel Companies agree that until target attribute states are set there is uncertainty around the implications of the policy. However, any return to the operative version of Policy 15 would need to include reinstatement of those parts of the Explanation that clarify how the term 'minimise' is to be interpreted in this context. Specifically, that minimisation involves reduction of effects to the extent reasonably achievable and that effects cannot always be completely avoided. Any interpretation of the term 'minimise' that required effects to be reduced to the smallest amount possible without enabling consideration of the practicality of doing so in the context of the activity and receiving environment would be opposed.	Allow the submission only if the explanatory text relating to the term 'minimise' is reinstated along with the operative version, or components of the operative version of Policy 15.
S32 Director-General of Conservation	S32.020	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	The changes sought introduce a requirement to avoid all subdivision, use and development that results in any increase in risk and are more onerous than NZCPS Policy 25. The proposed change does not recognise that some activities, such as Ports and associated infrastructure, have a functional need to locate in the coastal environment and can be designed and operated in a way that enables risk to be managed to acceptable levels.	Disallow the submission and do not include the new subclause sought in Policy 29.
S32 Director-General of Conservation	S32.023	Policy 41: Controlling the effects of earthworks and vegetation disturbance	Support in part	The Fuel Companies agree that until target attribute states are set there is uncertainty around the implications of the policy. However, any return to the operative version of Policy 41 would need to include reinstatement of those parts of the Explanation that clarify how the term 'minimise' is to be interpreted in this context. Specifically, that minimisation involves reduction of effects to the extent reasonably achievable and that effects cannot always be completely avoided. Any interpretation of the term 'minimise' that required effects to be reduced to the smallest amount possible without enabling consideration of the practicality of doing so in the context of the activity and receiving environment would be opposed.	Allow the submission only if the explanatory text relating to the term 'minimise' is reinstated along with the operative version, or components of the operative version of Policy 41.
S99 Genesis Energy Limited	S99.001	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans	Support	Agree that the social, economic, cultural & environmental benefits of renewable energy and regionally significant infrastructure should be protected from reverse sensitivity effects.	Allow the submission and include an additional clause in Policy 7 relating to the protection of renewable energy and regionally significant infrastructure from reverse sensitivity effects.
S137 Greater Wellington Regional Council	S137.009	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Oppose in part	The Fuel Companies agree that changes are required to Policy CC.9 to clarify the intent. However, the changes proposed by S137 to the wording of Policy CC.9 place an obligation on all subdivision, use or development to demonstrate a contribution to reducing greenhouse gas emissions and supporting the move towards low and zero-carbon modes. While the general intent is acknowledged, there will continue to be reliance on carbon-based energy sources and associated infrastructure, at least in the short term. The proposed policy wording may undermine the ability for such facilities to undertake essential maintenance, repair and upgrade work (for example replacement of underground fuel tanks at a service station) to ensure the risk and effects of such facilities continue to be managed in an appropriate manner.	Allow the submission to the extent that amendments are made to clarify the intent of Policy CC.9, but do not make the wording changes sought by GWRC.
S137 Greater Wellington Regional Council	S137.062	General comments - definitions	Support	Introduction of a definition for 'minimise' would be useful in order to avoid an interpretation of the term that requires reduction of effects to the smallest possible amount. While it may be possible to reduce certain effects to the	Allow the submission and introduce the proposed definition for 'minimise', as follows:

**FURTHER SUBMISSIONS OF THE FUEL COMPANIES ON
SUBMISSIONS TO PROPOSED CHANGE 1 TO THE WELLINGTON REGIONAL POLICY STATEMENT**

Submitter name / number:	Sub number:	RPS Change 1 Provision	Support or Oppose	Reasons:	Decision sought:
				smallest possible amount, it may not always be practicable to do so in the context of the specific activity proposed, its location, any benefits associated with the activity or any functional and operational constraints.	<i>Minimise: Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.</i>
S128 Horticulture New Zealand	S128.005	Objective CC.3	Support	Agree that Objective CC.3 should be amended to enable transition, rather than just limiting increases in emissions.	Allow the submission and amend Objective CC.3 as necessary to ensure a policy approach of enabling transition. The Fuel Companies seek to be involved in the development of any amendments.
S115 Hutt City Council	S115.013	Objective 12	Support	Support the intent of the submission to amend Objective 12 to give effect to the NPS-FW in the regional context, rather than simply repeating the higher order direction, subject to review of any amended wording.	Allow the submission and amend Objective 12 as sought. The Fuel Companies seek to be involved in the development of any amendments.
S115 Hutt City Council	S115.014 to S115.019	Indigenous ecosystems - Introductory text - Objective 16 - Objective 16B - Objective 16C - Objective 16A -	Support	Agree with concern raised that the appropriateness of the Change 1 provisions relating to indigenous biodiversity is uncertain, until such time as the NPS-IB is gazetted, and that the existing Operative RPS provisions should be retained. Any change to provisions relating to indigenous biodiversity should be made only after gazettal of the NPS-IB.	Allow the submission and delete all new provisions and amendments to existing provisions relating to indigenous biodiversity and retain existing Operative RPS provisions.
S115 Hutt City Council	S115.029	Policy CC.3: Enabling a shift to low and zero carbon emission transport - district plans	Support	Support retention of Policy CC.3 to enable infrastructure that supports the update of zero and low-carbon transport; as well as introduction of a definition for "zero and low-carbon multi-modal transport". The Fuel Companies anticipate this would include enabling infrastructure such as EV charging facilities and biofuels facilities.	Allow the submission and retain Policy CC.3 and introduce an appropriate definition for "zero and low-carbon multi-modal transport".
S115 Hutt City Council	S115.031	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature based solutions to climate change - district and regional plans	Support	The Fuel Companies expressed concerns in their own submission around the Policy CC.7 requirements to deliver 'nature based solutions' and the need to enable continued use of existing traditional infrastructure types. Deletion of the policy in its entirety is supported.	Allow the submission and delete Policy CC.7 in its entirety.
S115 Hutt City Council	S115.037	Policy 12: Management of water bodies - Regional Plans	Support	Support the intent of the submission to amend Policy 12 to give effect to the NPS-FW in the regional context, rather than simply repeating the higher order direction, subject to review of any amended wording.	Allow the submission and amend Policy 12 as sought. The Fuel Companies seek to be involved in the development of any amendments.
S115 Hutt City Council	S115.047 to S115.049	Indigenous ecosystems - Policy 23 - Policy 24 - Policy IE.1	Support	Agree that provisions relating to indigenous biodiversity should only be reviewed once the NPS-IB is gazetted, or as a minimum, the timeframes should be amended to align with those set out in the most recent draft of the NPS-IB.	Allow the submission and delete all new provisions and amendments to existing provisions relating to indigenous biodiversity and retain existing Operative RPS provisions.
S115 Hutt City Council	S115.0122	Definitions – nature based solutions	Support	Agree with S115 that the definition of nature based solutions is not clear enough to provide direction to plan users.	Allow the submission and amend the definition to provide clarity about what is covered by the term.

**FURTHER SUBMISSIONS OF THE FUEL COMPANIES ON
SUBMISSIONS TO PROPOSED CHANGE 1 TO THE WELLINGTON REGIONAL POLICY STATEMENT**

Submitter name / number:	Sub number:	RPS Change 1 Provision	Support or Oppose	Reasons:	Decision sought:
S113 Wellington Water	S113.027	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Agree with S113 that not all activities can avoid high risk areas.	Allow the submission and amend Policy 29 to provide for the appropriate management of risk to regionally significant infrastructure, in addition to the changes sought in the Fuel Companies own submission.
S158 Kāinga Ora	S158.037	Objective 22	Support	Agree with the submitter that many of the sub-points within the objective are unnecessary and create the potential for confusion given these issues are addressed in separate, more comprehensive chapters.	Allow the submission and amend Objective 22 as sought.
S158 Kāinga Ora	S158.045	General comments - climate change	Support	The intent of the submission to re-write some of the objectives, policies and methods relating to climate change to be more directive and to avoid ambiguity to District Councils and Plan users is supported.	Allow the submission. The Fuel Companies seek to be involved in the development of any amendments.
S158 Kāinga Ora	S158.046	General comments – overall	Support	The Fuel Companies agree PC1 needs to be amended to align with and ensure it does not go beyond what is required under the NPS-FM (including the 8 Dec 22 amendments) and the NPS-IB (once gazetted).	Allow the submission. The Fuel Companies seek to be involved in the development of any amendments.
S148 Wellington International Airport Ltd (WIAL)	S148.051	Policy 55: Providing for appropriate urban expansion - consideration	Support	The Fuel Companies support the amendment sought to Policy 55 to ensure particular regard is had to whether urban development is compatible with and does not adversely affect or constrain the ability to operate existing regionally significant infrastructure.	Allow the submission and amend Policy 55 as sought by WIAL.
S124 KiwiRail Holdings Limited	S124.012	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support	Agree that significant development capacity needs to be managed to ensure that any effects at the interface of conflicting land uses, including reverse sensitivity effects, are appropriately managed.	Allow the submission and amend Policy UD.3 as sought, to require minimisation of land use conflicts and avoidance of reverse sensitivity effects.
S100 Meridian Energy Limited	S100.002	Overarching Objective A	Support	The Fuel Companies agree that the RPS should provide clear guidance on the importance of maintaining, upgrading and adapting or relocating regionally significant infrastructure where this is necessary to support community resilience.	Allow the submission and amend Objective A as sought by Meridian.
S100 Meridian Energy Limited	S100.004	Chapter 3.1A: Climate change Objective CC.1	Support	The Fuel Companies agree that Objective CC.1 should apply to all types and scales of infrastructure including local infrastructure and regionally significant infrastructure.	Allow the submission and amend Objective CC.1 as sought by Meridian.
S100 Meridian Energy Limited	S100.014	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure	Support in part / oppose in part	The Fuel Companies agree that the benefits of all infrastructure are relevant (not just 'low and zero carbon regionally significant infrastructure'). Also, that the expression 'low and zero carbon regionally significant infrastructure' is uncertain as it is not defined in the RPS, and that additional text in the explanation would be useful. However, the wording suggested, particularly in clause (a)(ii) does not recognise the role that existing carbon-based RSI will continue to play in providing a diversity of energy sources, at least during a transition to low carbon energy provision.	Allow the submission in part and amend Policy 7 to ensure the benefits of all regionally significant infrastructure are recognised. The Fuel Companies seek to be involved in any redrafting of Policy 7.

**FURTHER SUBMISSIONS OF THE FUEL COMPANIES ON
SUBMISSIONS TO PROPOSED CHANGE 1 TO THE WELLINGTON REGIONAL POLICY STATEMENT**

Submitter name / number:	Sub number:	RPS Change 1 Provision	Support or Oppose	Reasons:	Decision sought:
S127 Neo Leaf Global	S127.006	General comments	Support	The Fuel Companies agree there is uncertainty around what end state will be expected to be achieved where the terms 'restore' and 'restoration' are used.	Allow the submission and replace "restore" and "restoration" with "enhancement" and "improvement" throughout the document.
S162 Winstone Aggregates	S162.032	Definitions: Restoration	Support	Agree that the basis for the definition is unclear and potential pre-empts the NPS-IB.	Allow the submission and amend the definition of restoration as sought.
S30 Porirua City Council	S30.034	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans	Support in part	While the Fuel Companies submission on this policy seeks deletion of the reference to 'low and zero carbon regionally significant infrastructure', if the reference is retained, they agree the term should be defined for clarity and certainty.	If reference to 'low and zero carbon regionally significant infrastructure' is retained, allow the submission and define the term for clarity and certainty. The Fuel Companies seek to be involved in the drafting of any such definition.
S30 Porirua City Council	S30.059	Policy CC.11: Encouraging whole of life carbon emissions assessment -consideration	Support	The Fuel Companies own submission seeks inclusion of a definition for 'transport infrastructure' to provide certainty around the type and scale of infrastructure this policy applies to. However, as an alternative, deletion of the policy, as sought by PCC, is supported. The Fuel Companies would not support application of this policy to EV points, as PCC suggests could be the result from the current lack of certainty.	Allow the submission and delete Policy CC.11.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.070	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The Fuel Companies do not support the 'avoidance' approach proposed by Forest & Bird, and note the wording proposed is more restrictive than the NZCPS.	Disallow the submission and do not make the amendments sought.
S10 Transpower New Zealand Limited	S10.002	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	Agree there is a need to recognise that some infrastructure has a functional or operational need to be constructed or operated in certain locations.	Allow submission and amend Policy 24 to recognise that regionally significant infrastructure may have a functional or operational need to locate in a particular location.
S129 Waka Kotahi	S129.018	Policy CC.9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	The Fuel Companies agree that further clarification is needed with regard to how the RPS will direct a shift to greenhouse gas reduction and low emission fuels.	Allow the submission and amend Policy CC.9 as sought.
S113 Wellington Water	S113.002	Overarching Objective A	Support	The Fuel Companies agree with the concerns raised by Wellington Water around the drafting of Objective A, in particular that it fails to provide for regionally significant infrastructure, for the characteristics & qualities of well-functioning urban environments and has some unclear drafting.	Allow the submission and amend Objective A as sought.

**FURTHER SUBMISSIONS OF THE FUEL COMPANIES ON
SUBMISSIONS TO PROPOSED CHANGE 1 TO THE WELLINGTON REGIONAL POLICY STATEMENT**

Submitter name / number:	Sub number:	RPS Change 1 Provision	Support or Oppose	Reasons:	Decision sought:
S140 Wellington City Council	S140.074	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	The Fuel Companies agree that as currently wording, Policy 51 is overly restrictive for certain use and development in area of high to extreme natural hazard risk and support the alternative wording suggested.	Allow the submission and amend Policy 52 as sought.

Form 6

Further Submissions on the Proposed Greater Wellington Regional Policy Statement 2022

To: Greater Wellington Regional Council
PO BOX 11646, Manners St
Wellington 6142

Attention: Hearings Advisor
Submitter: Fulton Hogan Limited

This is a further submission by Fulton Hogan Limited (Fulton Hogan) on the proposed Greater Wellington Regional Policy Statement Change 1.

Fulton Hogan has an interest in the proposal that is greater than the interest of the general public. This is because submissions have been made which, if relief is granted as sought, have the potential to positively or adversely impact on the ability of Fulton Hogan to operate their business in an efficient and effective manner.

The table annexed as **Appendix A** and forming a part of this further submission contains:

- a) The submissions which Fulton Hogan supports or opposes,
- b) The particular parts of those submissions supported or opposed,
- c) Reasons for support or opposition, and
- d) The decision sought by Fulton Hogan (whether the submission should be allowed or disallowed).

Fulton Hogan wishes to be heard in support of its further submission.

If others make a similar submission, Fulton Hogan will consider presenting a joint case with them at a hearing

Signed on behalf of
Fulton Hogan



Dated 19 December 2022

Address for Service of Submitter:

Tonkin + Taylor Ltd
Level 3, PwC Centre, 60 Cashel Street, Christchurch 8013
PO Box 13055, Christchurch
Attn: Tim Ensor

Phone +64 21 486 203
Email tensor@tonkintaylor.co.nz

Appendix A: Further Submissions

<i>Ref#</i>	<i>Fulton Hogan supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission Fulton Hogan supports or opposes is:</i>	<i>The reasons for Fulton Hogan's support or opposition are:</i>	<i>Fulton Hogan seeks the following:</i>
1	Horticulture New Zealand	Support	S128.001 Overarching Issue 1: Adverse impacts on natural environments and communities	Urban development can prevent access to suitable quarry sites for aggregate extraction. Also, reverse sensitivity effects resulting from urban growth can be significant for activities such as quarrying. Therefore, Fulton Hogan supports the identification of land loss and fragmentation and reverse sensitivity effects as overarching resource management issues.	The submission be allowed.
2	Porirua District Council	Support	S30.012 Objective 12	Objective 12 repeats the NPS-FM Te Mana o te Wai hierarchy. The pRPS needs to give effect to the NPS-FM but should provide a regional context to the priorities. It is unclear how the iwi statements, which form part of Objective 12, are to be applied when implementing the RPS. The statements cover a wide range of matters, include their own objectives and policies that sit within Objective 12, and include some matters that are outside the scope of the RMA. This will create significant confusion and complexity when implementing the RPS. The statements need to be refined if they are to be included and greater clarity is required on their implementation.	The submission be allowed.
3	Meridian Energy Limited	Support	S100.010 Objective 16	It may not always be possible to enhance or restore existing ecosystems which may be affected by a development. Therefore, it should be clarified that enhancement and restoration of an existing ecosystem should occur where appropriate.	The submission be allowed.
4	Meridian Energy Limited	Support	S100.011 Objective 16A	Similar to Objective 16, enhancement and restoration of an existing ecosystem will not be the most appropriate response in all situations and the wording should reflect this. Agree with the submitter that improving resilience and 'giving effect to Te Rito o te Harakeke' should be addressed through policy direction rather than being included within an objective. The policy should provide the direction as to how the 'maintain' and 'enhance' elements of the objective are to be achieved.	The submission be allowed.

Ref#	Fulton Hogan supports or opposes the submission of:	Support or opposition	The particular part of the submission Fulton Hogan supports or opposes is:	The reasons for Fulton Hogan's support or opposition are:	Fulton Hogan seeks the following:
5	Horticulture New Zealand	Support in part	S128.014 Regional form, design and function introductory text	<p>Fulton Hogan is supportive of the inclusion of the term 'highly productive land' as a regionally significant feature and value that should be recognised and provided for as part of regional form, design and function. However, we note that the use of highly productive land is not limited to food production and in reality, there are factors other than soil properties that influence whether land has productive value. This is recognised through the NPS-HPL by providing a consenting pathway for quarries on highly productive land.</p> <p>Aggregates are a vital, if under recognised component of everyday life. Without them there would be none of the infrastructure on which modern society relies. Transportation is often the single most important factor in determining the delivered price of aggregates highlighting the importance of establishing and protecting local sources of aggregate.</p> <p>Often the aggregate resources required are physically available but access to them may become constrained by, amongst other matters:</p> <ul style="list-style-type: none"> a) A lack of appropriate importance being placed on them by the local planning framework, b) Land use planning provisions that either fail to appropriately facilitate extraction opportunities or are overtly inhospitable to extraction activities, c) Establishment of incompatible land use activities on or adjacent to resources. <p>Consequently, it is vital that aggregates are specifically recognised as a regionally significant value and feature, similar to highly productive land, within the introductory text and throughout the pRPS.</p>	The submission be allowed.
6	Winstone Aggregates	Support	S162.041 Regional form, design and function introductory text	<p>As outlined above aggregate supply is a key requirement for building and development. Quarrying activities can only be located where the resource naturally occurs. This, coupled with the significant contribution transportation has to the cost of aggregate mean that local aggregate supplies are required to minimise construction costs. Locally available aggregate supplies are therefore a significant issue for the construction and development in the region and should be recognised in the introductory text.</p>	The submission be allowed.
7	Aggregate and Quarry Association (AQA)	Support	S29.001 Issue 2: Sporadic, uncontrolled and/or uncoordinated development	<p>As aggregate supplies are locationally constrained, and given their importance to infrastructure and urban construction and development, we agree that aggregate resources should be identified and protected through Council planning processes as part of regional form, design and function.</p>	The submission be allowed.

<i>Ref#</i>	<i>Fulton Hogan supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission Fulton Hogan supports or opposes is:</i>	<i>The reasons for Fulton Hogan's support or opposition are:</i>	<i>Fulton Hogan seeks the following:</i>
8	Horticulture New Zealand	Support	a Objective 22B	Highly productive land and primary production activities which occur on that land (which include more than just food production), should be protected from urban encroachment. Urban and rural residential development can sterilise land for aggregate extraction and result in reverse sensitivity effects. The submission is supported in so far as it requests greater clarity on what the 'significant values and features' are.	The submission be allowed.
9	Powerco	Support	S134.010 Policy 18	The submission identifies that clauses (c) and (e) of policy 18 are inconsistent with the direction provided in the NPS-FM. Specifically, they do not recognise the exceptions to clause (c) relating to natural wetlands and that the loss of river extent and values is to be avoided 'to the extent practicable'. These qualifiers are important and need to be represented in the RPS and the submission is supported on this basis.	The submission be allowed.
10	Winstone Aggregates	Support	S162.008 Policy 23	<p>The proposed 2025 date to map Significant Natural Areas (SNA) is 2.5 years shorter than the 5-year period contained within the exposure draft of the NPS-IB. This is a very short time to accurately map SNA.</p> <p>Agree that there is often conflict between areas of land that contain regionally significant mineral deposits and land that contains significant indigenous biodiversity values due to this land being set aside for future aggregate extraction. Further detailed analysis of the costs of creating SNA needs to be included within the s32 report.</p> <p>Support regional mapping of significant aggregate/mineral deposits and to inform the creation of a viable policy pathway for quarrying within the areas identified.</p> <p>Agree that policy 23 includes a number of undefined terms which are similar to new definitions in the pRPS (e.g. 'enhances connectivity' versus 'ecological connectivity'). It is unclear how policy 23 and the new definitions interrelate.</p>	The submission be allowed.

<i>Ref#</i>	<i>Fulton Hogan supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission Fulton Hogan supports or opposes is:</i>	<i>The reasons for Fulton Hogan's support or opposition are:</i>	<i>Fulton Hogan seeks the following:</i>
11	Winstone Aggregates	Support	S162.009 Policy 24	<p>The reason for limiting offsetting and compensation in policy 24 is unclear. Also, the list in Appendix 1A covers a significant number of ecosystems and species within the region. We understand that the list is based on ecosystems and species that are 'naturally uncommon'. Further investigation into the costs of such an approach to develop Appendix 1A is required.</p> <p>Limiting the use of offsetting and compensation has the potential to effectively halt developments across a significant portion of the region where effects cannot be avoided or mitigated. This effectively sterilises the use of the site. This has significant implications for quarrying which can only occur where the resource is located. By limiting offsets and compensation in such a way, the policy effectively prohibits activities where effects cannot be avoided or mitigated, does not allow for a site specific consideration and may in fact result in missed opportunities for net biodiversity gain.</p> <p>It is unclear if Appendix 1A has been developed based on the criteria in policy 23.</p>	The submission be allowed.
12	Horticulture New Zealand	Support	S128.036 Policy 29	Avoiding all subdivision, use and development in areas where hazards are high to extreme is too onerous. Low vulnerability structures/activities may be acceptable in certain circumstances and this should be based on a site specific consideration.	The submission be allowed.
13	Winstone Aggregates	Support	S162.035 Policy 33	Support the intent of the policy to create well-functioning urban environments. However, it should also be recognised that a well-functioning urban environment requires a locally available source of aggregate, often located in a rural environment, to support construction activities and reduce transport related costs and greenhouse gas emissions.	The submission be allowed.
14	Meridian Energy Limited	Support	S100.017 Policy IM.2	Policy IM.2 includes a number of vague terms that create uncertainty. Therefore, interpretation of the policy will likely be inconsistent, create significant complexity and result in differing interpretations. On this basis the submission is supported.	The submission be allowed.
15	Winstone Aggregates	Support	S162.010 Policy 39	The regional significance of mineral resources and local aggregate supply to development needs to be recognised through the policy direction. If a local aggregate supply is not available, the cost of transporting the material increases significantly. This will increase development costs within the region. Therefore, available mineral and aggregate sources need to be protected and their future use enabled. Furthermore, the policy direction needs to recognise that quarry activities are locationally constrained and can only occur where the resource exists.	The submission be allowed.

<i>Ref#</i>	<i>Fulton Hogan supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission Fulton Hogan supports or opposes is:</i>	<i>The reasons for Fulton Hogan's support or opposition are:</i>	<i>Fulton Hogan seeks the following:</i>
16	Winstone Aggregates	Support	S162.011 Policy 39	The regional significance of mineral resources and local aggregate supply to development needs to be recognised through the policy direction. If a local aggregate supply is not available, the cost of transporting the material increases significantly. This will increase development costs within the region. Therefore, available mineral and aggregate sources need to be protected and their future use enabled. Furthermore, the policy direction needs to recognise that quarry activities are locationally constrained and can only occur where the resource exists.	The submission be allowed.
17	Winstone Aggregates	Support	S162.012 Policy 39	The regional significance of mineral resources and local aggregate supply to development needs to be recognised through the policy direction. If a local aggregate supply is not available, the cost of transporting the material increases significantly. This will increase development costs within the region. Therefore, available mineral and aggregate sources need to be protected and their future use enabled. Furthermore, the policy direction needs to recognise that quarry activities are locationally constrained and can only occur where the resource exists.	The submission be allowed.
18	Winstone Aggregates	Support	S162.013 Policy 40	Clause (n) of policy 40 adopts an avoid approach to the removal or destruction of natural indigenous plants in wetlands. This is inconsistent with the NPS-FM which includes a number of exceptions that enable works within wetlands. Similarly, the NESF does not prohibit vegetation clearance in wetlands. Clause (h) needs to provide a clear link to the SNA's that are to be protected (e.g. those that are identified under policy 23). There is misalignment between this policy and Policy 18 which uses the terms protecting and restoring as opposed to protecting and enhancing.	The submission be allowed.
19	Powerco Limited	Support	S134.015 Policy 40	A requirement to enhance as well as protect the health and well-being of freshwater ecosystems in all situations is overly onerous. In practice, to be consistent with this policy all resource consent applications that relate to freshwater ecosystems will need to demonstrate that the proposed activity is not only protecting the water-body, but resulting in an overall improvement.	The submission be allowed.
20	Winstone Aggregates	Support	S162.015 Policy 47	Agree that point (i) relating to limits to offsetting and compensation in policy 24 should be removed for the reasons outlined in further submission point 11. Alignment of the terms used in the policy (e.g. maintaining connections) and the proposed new definitions (e.g. ecological connectivity) and any unintended consequences need to be investigated.	The submission be allowed.
21	Powerco Limited	Support	S134.017 Policy 51	The direction in clause (g) of policy 51 to avoid all subdivision, use and development in areas where hazards are high to extreme is opposed. Low vulnerability structures/activities may be acceptable in certain circumstances and this should be based on a site specific consideration.	The submission be allowed.

<i>Ref#</i>	<i>Fulton Hogan supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission Fulton Hogan supports or opposes is:</i>	<i>The reasons for Fulton Hogan's support or opposition are:</i>	<i>Fulton Hogan seeks the following:</i>
22	Winstone Aggregates	Support	S162.016 Policy 55	The amendments to the policy 55 fail to recognise the importance of protecting regionally significant quarries/mineral/aggregate resources as provided for in policy 60 and objective 30 in the operative RPS. Reverse sensitivity effects and the sterilisation of the aggregate resource by urban development is a significant issue for the quarrying industry. Poorly planned urban development can lead to local sources of aggregate being unavailable as a construction resource, impacting the cost of housing and infrastructure construction. Therefore, we agree with and support relief that protects regionally significant mineral and aggregate resources from inappropriate development.	The submission be allowed.
23	Aggregate and Quarry Association (AQA)	Support	S29.002 Policy 56	Aggregate supplies are locationally constrained and the quarrying activity cannot occur at another location. Also, quarries need to be able to operate in close proximity to urban areas where development is occurring to minimise transport costs and subsequent development costs. Therefore, it is important that the policy provides direction that land in close proximity to urban areas is not sterilised through urban development. We support relief which protects primary production activities and recognises reverse sensitivity effects as an issue for existing primary production activities. Policy 56 refers to 'primary production', however, there is no definition of primary production in either the operative or proposed RPS. To support policy interpretation the National Planning Standards definition for 'Primary Production' should be included in the pRPS.	The submission be allowed.
24	KiwiRail Holdings Limited	Support	S124.012 Policy UD.3	Minimising land use conflict and avoiding reverse sensitivity effects should be a key consideration of any proposed urban expansion. Land sterilisation and reverse sensitivity are key issues for the quarrying industry.	The submission be allowed.
25	Horticulture New Zealand	Support	S128.054 Policy 67	The value of highly productive land, primary production activities on this land, and their protection from urban encroachment and urban sprawl should be recognised when establishing the qualities and characteristics of a well-functioning urban environment.	The submission be allowed.

<i>Ref#</i>	<i>Fulton Hogan supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission Fulton Hogan supports or opposes is:</i>	<i>The reasons for Fulton Hogan's support or opposition are:</i>	<i>Fulton Hogan seeks the following:</i>
27	Winstone Aggregates	Support	S162.018 Appendix 1A	<p>the list in Appendix 1A covers a significant number of ecosystems and species within the region. We understand that the list is based on ecosystems and species that are 'naturally uncommon'. Further investigation into the costs of such an approach to develop Appendix 1A and the subsequent offsetting and compensation exclusions is required.</p> <p>Coupled with policy 24, limiting the use of offsetting and compensation has the potential to effectively halt developments across a significant portion of the region where effects cannot be avoided or mitigated. This effectively sterilises the use of the site. This has significant implications for quarrying which can only occur where the resource is located. By limiting offsets and compensation is such a way, the policy effectively prohibits activities where effects cannot be avoided or mitigated, does not allow for a site specific consideration and may in fact result in missed opportunities for net biodiversity gain.</p> <p>It is unclear if Appendix 1A has been developed based on the criteria in policy 23.</p>	The submission be allowed.
28	KiwiRail Holdings Limited	Support	S124.015 General comments – definitions	A definition for 'well-functioning urban environment' consistent with the NPS-UD may assist with minimising conflict between urban environments and activities such as quarrying.	The submission be allowed.
29	Winstone Aggregates	Support	S162.019 General comments – definitions	The pRPS does not currently have a definition of 'Quarrying Activity'. Quarries and quarrying activities are critical to the development, upgrade and maintenance of infrastructure and play a significant role in supporting urban growth and development across the region through supplying critical materials. It is therefore appropriate that the activity is identified and recognised at a regional level through the pRPS. A new definition for quarrying activities that is consistent with the National Planning Standards should be included within the RPS.	The submission be allowed.
30	Winstone Aggregates	Support	S162.034 General comments – definitions	Definitions within the NPS-FM should be included within the RPS, or reference made to the NPS-FM definitions, within the RPS.	The submission be allowed.
31	Winstone Aggregates	Support	S162.020 Definition – biodiversity compensation	It is unclear where the definition for biodiversity compensation within the RPS has come from but it differs from the definition contained in the exposure draft of the NPS-IB. This submission is supported in so far as it identifies potential challenges with the RPS definition and potential inconsistency with future NPS..	The submission be allowed.

<i>Ref#</i>	<i>Fulton Hogan supports or opposes the submission of:</i>	<i>Support or opposition</i>	<i>The particular part of the submission Fulton Hogan supports or opposes is:</i>	<i>The reasons for Fulton Hogan's support or opposition are:</i>	<i>Fulton Hogan seeks the following:</i>
32	Winstone Aggregates	Support	S162.021 Definition – biodiversity offsetting	It is unclear where the definition for biodiversity offsetting has come from within the RPS. This submission is supported in so far as it identifies potential challenges with the RPS definition and potential inconsistency with future NPS.	The submission be allowed.
32	Winstone Aggregates	Support	S162.022 Definition – Ecological connectivity	It is unclear where the definition of ecological connectivity has come from. It is also similar to the definition of 'connectivity' within the exposure draft of the NPS-IB. This submission is supported in so far as it identifies potential challenges with the RPS definition and potential inconsistency with future NPS.	The submission be allowed.
33	Winstone Aggregates	Support	S162.023 Definition – ecological integrity	The definition of ecological integrity includes vague terms like 'full potential' and 'functioning in sustainable communities'. The definition is inconsistent with the definition included within the exposure draft of the NPS-IB. This submission is supported in so far as it identifies potential challenges with the RPS definition and potential inconsistency with future NPS.	The submission be allowed.
36	Meridian Energy Limited	Support	S100.026 Definition – maintain/ maintained/ maintenance'	Restoration and enhancement infer improvement, rather than maintenance. The need for, and appropriateness of, restoration and enhancement should be addressed through policy direction and not included within the definition. The reference to restoration or enhancement should be deleted from the definition to be consistent with the exposure draft of the NPS-IB.	The submission be allowed.
37	Winstone Aggregates	Support	S162.030 Definition – protect	The definition is vague (e.g. buffered) and doesn't provide clear direction as to when 'protection' is achieved. Sentence two of the definition could be interpreted to mean that, provided the species is secured from extinction, it has been protected. This provides incomplete guidance for plan makers and submitters on future planning processes and is therefore inefficient.	The submission be allowed.
38	Genesis Energy Limited	Support	S99.007 Chapter 3.6 Indigenous ecosystems	This submission highlights the potential for inconsistency and conflict between the RPS and a future NPSIB. This is also of concern to Fulton Hogan and the submission is supported on this basis.	The submission be allowed.

Addresses of submitters

Submitter	Address
Winstone Aggregates	Winstone Aggregates C/o: Tyler Sharratt PO Box 17 195 Greenlane Auckland
KiwiRail Holdings Limited	KiwiRail Holdings Limited C/o: Sheena McGuire PO Box 593 Wellington 6140
Horticulture New Zealand	Horticulture New Zealand C/o: Ailsa Robertson PO Box 10-232 WELLINGTON
Meridian Energy Limited	Meridian Energy Limited C/o: Andrew Feierabend P O Box 2128 8140 Christchurch
Porirua District Council	Porirua City Council C/o: Wendy Walker PO Box 50218 Porirua 5240
Aggregate and Quarry Association (AQA)	Aggregate and Quarry Association C/o: Wayne Scott P O Box 10-668 Wellington 6140
Powerco	Powerco Limited Private Bag 2061 New Plymouth 4340
Genesis Energy Limited	Genesis Energy Limited Level 6, 155 Fanshawe Street PO Box 90477 Victoria Street West Auckland 1142 alice.barnett@genesisenergy.co.nz

Further Submission on Proposed Change 1 to the Regional Policy Statement for the Wellington Region by Kāinga Ora – Homes and Communities

Clause 8 of Schedule 1 to the Resource Management Act 1991

To: Greater Wellington Regional Council
100 Cuba Street
Te Aro
Wellington
Submitted via email to: regionalplan@gw.govt.nz

Name of Further Submitter: Kāinga Ora – Homes and Communities

1. **Kāinga Ora – Homes and Communities (“Kāinga Ora”)** makes this further submission on Proposed Change 1 (“**PC1**”) to the Regional Policy Statement (“**RPS**”) in support of/in opposition to original submissions to **PC1**.
2. Kāinga Ora has an interest in PC1 that is greater than the interest the general public has, being an original submitter on the PC1 with respect to its interests as Crown entity responsible for the provision of public housing, and its housing portfolio in the Wellington Region.
3. Kāinga Ora makes this further submission in respect of submissions by third parties to PC1.

Reasons for further submission

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:

- (a) The reasons set out in the Kāinga Ora primary submission on the PC1.
 - (b) In the case of the Primary Submissions that are opposed:
 - i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 (“**RMA**”);
 - ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
 - iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
 - iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora primary submission.
 - (c) In the case of Primary Submissions that are supported:
 - i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
 - ii) The reasons set out in the Primary Submissions; and
 - iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

DATED 19th of December 2022

Kāinga Ora – Homes and Communities



Brendon Liggett

Manager – Development Planning

ADDRESS FOR SERVICE:

Kāinga Ora – Homes and Communities

PO Box 74598

Greenlane, Auckland

Attention: Development Planning Team

Email: developmentplanning@kaingaora.govt.nz

Appendix A – Further Submission Table

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Director General of Conservation	S32.020	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Amend the policy to give effect to the NZCPS, including by adding a new subclause as follows or words to like effect: "include objectives, polices and rules to avoid subdivision, use or development within the coastal environment that would increase the risk of adverse effects from coastal hazards"	Oppose	Kāinga Ora opposes this submission to the extent that it would apply to any coastal hazard. Policy 25 of the NZCPS is relevant only to areas potentially affected by coastal hazards over at least the next 100 years. Notwithstanding this, District Plans are required to give effect to the NZCPS therefore any duplication of such requirement through the RPS, in the absence of additional guidance, is unnecessary and superfluous.	Disallow
Director General of Conservation	S32.033	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	Support	add a new subclause as follow or words to like effect: "Require that urban development is located and designed to allow water bodies to meander and move naturally" .	Oppose	Kāinga Ora acknowledges that, where possible, urban development should be located and designed to allow water bodies to meander and move naturally; however, Kāinga Ora considers that this will not be possible in all development situations. Further to this, Kāinga Ora considers that this is a matter that is more appropriately managed through a Regional Plan, rather than District Plan.	Disallow
Greater Wellington Regional Council	S137.026	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Amend Clause (d) of Policy 29 as follows: ... (d) use a risk-based approach to assess the consequences to new or existing subdivision, use and development from natural hazard and climate change impacts over a 100 year planning horizon;	Oppose	Kāinga Ora opposes the proposed inclusion of "existing" into Policy 29, particularly insofar as it relates to managing effects of natural hazards on existing uses and activities through District Plans. District plans can only address future use, development and subdivision and cannot require change to existing use or development.	Disallow
Greater Wellington Regional Council	S137.026	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Amend Clause (e) and (f) in Policy 29 to read: (e) include hazard overlays , objectives, polices and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (f) include hazard overlays , objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.	Oppose	Kāinga Ora opposes mandatory use of hazard overlays. Kāinga Ora notes that hazards, such as flood hazards, are dynamic and change depending on the infrastructure and development in the area. Kāinga Ora supports flood hazard maps sitting outside the District Plan, in Council GIS mapping. To complement this, Kāinga Ora considers that definitions of differing hazard profiles should apply regionally, so as to provide an alternative tool in identifying hazards within District Plans. Further to this, Kāinga Ora considers that only 'inappropriate' use and development should be avoided. Kāinga Ora considers that the appropriate method for managing hazards is specific to the particular hazard and the local context.	Disallow

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Hutt City Council	S115.004	Overarching Issue 2: Increasing pressure on housing and infrastructure capacity	Oppose	Delete the issue statement (along with other issues), or if issue statements are retained amend Issue 2 as follows: "Population growth is putting pressure on housing and infrastructure capacity. To meet the needs of current and future populations, development will place additional pressure on the natural and built environments. At the same time, there is a need to increase housing supply across the region and ensure that future communities have good access to key services and employment opportunities. Planning decisions will need to consider a range of factors that contribute to a well- functioning urban environment and how the natural and built environment can work together to achieve this. "	Support	Kāinga Ora agrees that Issue 2 could be amended to recognise greater emphasis on achieving a well-functioning urban environment	Allow
Hutt City Council	S115.014	Chapter 3.6: Indigenous ecosystems – General Comments	Oppose	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.	Support	Noting the anticipated release of a National Policy Statement on Indigenous Biodiversity ("NPS-IB"), Kāinga Ora request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.	Allow
Hutt City Council	S115.030	Policy CC.4: Climate resilient urban areas - district and regional plans	Oppose	Delete Policy CC.4.	Support	Kāinga Ora agrees that Policy CC.4 as proposed is uncertain and unclear in how it would be implemented.	Allow
Hutt City Council	S115.028	Policy CC.2: Travel demand management plans - district plans	Oppose	Delete Policy CC.2	Support	Kāinga Ora considers that this policy should be deleted. The broad application of this policy is not adequately refined to achieve the outcome sought.	Allow
Kāpiti Coast District Council	S16.094	Chapter 3.9: Regional form, design and function – General Comments	Support in part	Delete all references to, and information from the WRGF throughout proposed RPS Change 1. Replace all references to the WRGF with placeholder references to a Future Development Strategy that has been prepared and published in accordance with the requirements of Subpart 4 of the NPS-UD.	Support	Kāinga Ora supports the deletion of reference to the WRGF within the RPS	Allow

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
KiwiRail Holdings Limited	S124.011	Policy 57: Integrating land use and transportation consideration	Support in part	<i>[Note: stated "Seek amendment" in original submission]</i> New subclause. iii. Let's Get Wellington Moving Growth Corridor; and (g) avoids the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.	Oppose	Kāinga Ora opposes the relief sought in relation to reverse sensitivity effects and considers that effects from the operation of transport corridors should first be mitigated at the source. Kāinga Ora considers that a policy requiring decision makers to consider 'avoiding the potential' for reverse sensitivity effects is ambiguous, overly directive, and places undue responsibility on the receiving environment to mitigate adverse effects.	Disallow
KiwiRail Holdings Limited	S124.012	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<i>[Note: stated "Seek amendment" in original submission]</i> New subclause under (a) (a) the location, design and layout of the proposal:.....iv. minimises land use conflicts as far as practicable, including avoiding the potential for reverse sensitivity effects.	Oppose	Kāinga Ora opposes the relief sought, particularly in relation to "avoiding the potential for reverse sensitivity effects" and consider that UD.3(a)(i) and the assessment in relation to the 'well-functioning urban environment' has broad coverage of issues with respect to future plan changes providing for development capacity.	Disallow
Porirua City Council	S30.022	Objective 22	Oppose	Amend the objective so that it is clear what the outcome sought is, and/or reword as follows: The Wellington regional form:A. Is compact, well designed and has good accessibility between housing, employment opportunities, community services, natural spaces, and open spaces, including:1. A network and hierarchy of commercial centres which support the primacy of the Wellington city centre followed by:i. Metropolitan Centres,ii. Town Centres, iii. Local Centres; andiv. Neighbourhood Centres; iii. Local Centres; andiv. Neighbourhood Centres; 2. A Regional urban form that is integrated with existing and planned transport network;3. Commercial and industrial activities distributed in appropriate locations and in a way that supports the commercial centres hierarchy	Support in part	Kāinga Ora supports this submission, to the extent that it is consistent with its primary submission.	Allow in part

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p>identified in A.1 above;4. More people living in, and more business and community services located in, areas that are in or near a commercial centre and/or well-served by public transport;5. Urban built environments that meet the health and wellbeing needs of people.B. Supports the competitive operation of land and development markets in ways that contribute to improved housing affordability and business activity, including:1. A variety of homes that meet the needs, in terms of type and location, of different households.2. Sufficient housing and business development capacity in the short and medium term as identified in Table 9A to RPS Objective 22A.3. A range of buildings and sites in appropriate locations that provide opportunities for commercial and industrial activities in a way that achieves the commercial centres hierarchy identified in A.1 above and maintains the primacy of the Wellington city centre.C. Optimises the efficient use of existing infrastructure.</p>			
Porirua City Council	S30.050	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: Regional and district plans shall include objectives, policies, rules and / or other methods that: (a) identify areas affected by natural hazards; and (b) use a risk-based approach to assess the</p>	Support in part	It is unclear what constitutes an "extreme" risk. Kāinga Ora agrees that low, medium, and high categorization of risk is consistent with best practice. Kāinga Ora further considers that definitions should be provided for consistent use throughout the region.	Allow in part

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				consequences to subdivision, use and development from natural hazard and climate change impacts over at least a 100 year planning horizon, which identifies the hazards as being low, medium or high; (c) include objectives, policies and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (d) include objectives, policies and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.			
Porirua City Council	S30.051	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Oppose	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: ...	Support in part	Kāinga Ora considers that the RPS should give better guidance on how the NPS-UD should be implemented across the Wellington region. Kāinga Ora supports this submission, to the extent that it is consistent with its primary submission.	Allow in part
Porirua City Council	S30.0104	Appendix 3: Definitions High Density Development	Support [Oppose]	Delete definition, or amend so that it provides clear and appropriate direction to plan users.	Support	Kāinga Ora agrees that the proposed definition reads as a zone statement, or direction to be provided within provisions, rather than a definition.	Allow
Porirua City Council	S30.0107	Appendix 3: Definitions Medium Density Development	Oppose	Delete definition, or amend so that it provides clear and appropriate direction to plan users.	Support	Kāinga Ora agrees that the proposed definition reads as a zone statement, or direction to be provided within provisions, rather than a definition.	Allow
Toka Tu Ake EQC	S132.004	Objective 22	Support in part	Add: l) minimise the exposure of residents to natural hazards, and account for future natural hazard risk increased by the effects of climate change	Oppose	Kāinga Ora opposes the relief sought. Consistent with its primary submission, Kāinga Ora considers that Objective 22 operates as a 'plan within a plan'. Natural hazards provisions are provided within separate, more comprehensive section of the RPS.	Disallow
Toka Tu Ake EQC	S132.007	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Strengthen, change to: "Avoid subdivision, use and development in areas at high risk from natural hazards and manage in areas of lower risk" Add guidance on what constitutes low, medium, and high natural hazard risk, to avoid inconsistent application of these terms in district plans.	Oppose in part	Kāinga Ora considers that a qualifier is required, such that only <i>'inappropriate'</i> subdivision, use and development be avoided, in areas at high risk from natural hazards. Kāinga Ora agrees that additional guidance on what constitutes low, medium, and high natural hazard risk, would be useful within the RPS to avoid inconsistent application of these terms in district plans.	Disallow in part

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Toka Tu Ake EQC	S132.012	Method 22: Integrated hazard risk management and climate change adaptation planning	Support in part	Re-instate the phrase: "Prepare and disseminate information about how to identify areas at high risk from natural hazards, as relevant to the development of hazard management strategies to guide decision-making"	Support	Kāinga Ora supports there being a consistent approach to the identification and management of natural hazards across the region, particularly in relation to high risk natural hazards.	Allow
Transpower New Zealand Limited	S10.003	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support in part	Define the terms used in Policy 29 or provide the reader with guidance. For example, in the Explanation, on where definition of these terms can be found. Clarify the wording of Policy 29 in relation to hazards and risks and different hazard and risk levels or categories.	Support	Kāinga Ora agrees that low, medium, and high categorisation of risk is consistent with best practice. Kāinga Ora considers that definitions should be provided for consistent use throughout the region.	Allow
Waka Kotahi NZ Transport Agency	S129.024	General comments - urban development	Support in part	Clarify how Objective 22A provides the scope for Policy 55 to define what appropriate urban expansion is and how it will be provided.	Support	Kāinga Ora supports the relief sought.	Allow
Waka Kotahi NZ Transport Agency	S129.025	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Add explanation to note that urban expansion occurring as anticipated by strategic planning or zoning within district plans should be prioritised. Out of sequence or out of zone urban expansion can result in the inefficient use of, and has adverse effects on, infrastructure.	Support	Kāinga Ora supports the relief sought.	Allow
Waka Kotahi NZ Transport Agency	S129.027	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Amend Policy UD.3 as follows: Responsive planning to developments that provide for a within the existing urban environment is priorities ahead of greenfield developments when significant development capacity is considered – consideration	Support	Kāinga Ora supports the relief sought, accepting that intensification within existing urban areas should be a priority.	Allow
Waka Kotahi NZ Transport Agency	S129.034	Method UD.1: Development manuals and design guides	Support in part	Amend method to ensure that urban design guidance and development manuals include mode choice and encourage development in close proximity to existing transport choices.	Support in part	Kāinga Ora supports non-regulatory urban design guidance, including encouraging development in close proximity to existing public transport. Kāinga Ora considers that this method should also refer to planned public transport.	Allow in part

Submitter Name	Submission Point Number	Provision / Chapter Topic	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	34.049	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	<i>Support in part</i>	Define extreme, high, moderate and low risk and amend policy to read: Policy 29: Avoiding inappropriate Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans.	Support in part	Kāinga Ora agrees that definitions should be provided for each hazard profile, for consistent use throughout the region. Any reference to “avoiding” and/or “avoid” should be followed with “inappropriate” in the context of Policy 29.	Allow in part

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

Who can make a Further Submission:

A further submission may only be made by a person who:

- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

- Online using our submission portal *Spoken*, at: <https://tinyurl.com/gwrc-rps-change-furthersubs>
- Email your Further Submission and this completed form to: regionalplan@gw.govt.nz
- Post your Further submission and this completed form to: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser. **N.B. Due to delays in postal services and the timeframe for making Further Submissions we highly recommend that an electronic copy of your Further Submission is provided by the closing date OR delivered to one of our offices.**
- Drop your Further Submission and this completed form to reception at one of Greater Wellington's offices.

(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter	
Name (First and Last) OR Organisation / Company: Wellington City Council	
Address for Service (Email OR Postal Address): District.Plan@wcc.govt.nz Phone: 021 198 7136	
Contact name and postal address for service of person making submission: John McSweeney, PO Box 2199, Wellington 6140, New Zealand (If different from above)	
Only certain people may make further submissions Please tick the option that applies to you:	
<input type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input checked="" type="checkbox"/>	I am the local authority for the relevant area.
Specify below the grounds for stating that you are within the category you have ticked:	

2. Appearance at hearing Please select from the following:

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
<input checked="" type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearing

3. For the further submitter to action

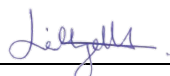
Service of your further submission:

Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**

Each submitter has an address for service available at: <https://www.gw.govt.nz/rps-pc-1-submissions>

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: _____



Date: 8 / 12 / 2022

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

All Further Submissions (including name and address for service) are made publicly available on our website. Your name and address for service will be used for correspondence during the hearing process. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

Wellington City Council's Further Submission

Note: Words in **bold** reflect suggested additions and words in strikethrough reflect suggested deletions.

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S151 NZ Centre for Sustainable Cities	S151.012	Support in part	General comments - overall	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.	Consistent with Wellington City Council's position on the matter.	Allow
S158 Kāinga Ora Homes and Communities	S158.043	Support	General comments - overall	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.	Consistent with Wellington City Council's position on the matter.	Allow
S129 Waka Kotahi NZ Transport Agency	S129.002	Support in part	Objective CC.1	Supports (b) and the provision of well-functioning urban areas.	Seeks further clarification of how low emission and climate mitigation and adaptation is defined.	Consistent with Wellington City Council's position on the matter.	Allow
S129 Waka Kotahi NZ Transport Agency	S129.004	Support	Objective CC.2	Supports the costs and benefits of transitioning to low carbon being shared fairly.	Seeks clarification of how the costs and benefits will be shared.	Consistent with Wellington City Council's position on the matter.	Allow

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S30 Porirua City Council	S30.001	Oppose	Overarching Issue 1: Adverse impacts on natural environments and communities	<p>Resource management issue 1 is titled 'adverse impacts on natural environments and communities', however unlike adverse effects on natural resources, adverse effects on communities are not identified. The issue is framed very negatively. For instance, not all ecosystems have been destroyed, but certainly some have, and many have been degraded. Some ecosystems are still intact. This creates an unbalanced issue statement and associated Objective A which fails to identify the benefits of urban development as identified by the National Policy Statement on Urban Development 2020.</p>	<p>Amend reason 1 to identify adverse effects on communities and the benefits of urban development, and relocate effects of climate change into a separate issue; and/or reword as follows:</p> <p>Adverse impacts on natural environments and communities Inappropriate and poorly managed use and development of natural and physical resources the environment, including both urban and rural activities, have damaged and continue to impact the natural environment, and to contribute to an increase in greenhouse gas emissions. It has also resulted in destroying degraded ecosystems, degrading and water quality, adversely impacting the relationship between mana whenua and the taiao, and leaving communities and nature increasingly exposed to the impacts of climate change.</p> <p>Increasing pressure on housing supply and choice and infrastructure capacity Population growth is putting pressure on housing and infrastructure capacity. To meet the needs of current and future populations, poorly managed development will place additional pressure on the natural and built environments.</p>	Consistent with Wellington City Council's position on the matter.	Allow
S115 Hutt City Council	S115.008	Support in Part	Objective CC.3	<p>The general intent of the objective is supported. However, we question whether the proposed policies and methods (or any possible policies and methods of an RPS) can take primary responsibility for achieving this goal.</p> <p>In addition, clause (a)(ii) refers to a percentage change in mode share. Mode share is already a percentage - the objective should clarify whether this goal is 40 percent of the relevant current mode share figure, or 40 percentage points.</p>	<p>Amend Objective CC.3 to clarify the intent of clause (a)(ii) add to the following note: "Note: while policies and methods of this RPS contribute to achieving this objective, it is primarily achieved outside the resource management system, including through the New Zealand Emissions Trading Scheme"</p>	Inconsistent with Wellington City Council's position on the matter.	Disallow

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S137 Greater Wellington Regional Council (GWRC)	S137.007	Support in part	Objective CC.3	Insert 'contribute to' into clause (b) for consistency with clause (a).	Clause (b) to read: (b) By 2050, to contribute to achieving net-zero emissions.	Consistent with Wellington City Council's position on the matter.	Allow
S113 Wellington Water	S113.004	Support in part	Objective CC.4	Nature based solutions aren't always practicable in Wellington's constrained urban environments.	Amend Objective CC.4 as follows: Objective CC.4: Where practicable , Nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment.	Consistent with Wellington City Council's position on the matter.	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.058	Support in part	Objective CC.5	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and particularly in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon sink. Amendments are required to make the intent clear.	Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.	Consistent with Wellington City Council's position on the matter.	Allow
S113 Wellington Water	S113.020	Support in part	General comments - fresh water	There is an overlap between GW and District and City Councils regarding the control of land use for water quality. This is critical for delivery of our upcoming stormwater consent application. Provisions addressing the overlap must be clear about the extent of mutual responsibilities and avoid the risk of regional or territorial authorities individually taking less responsibility due to mutual obligations. This applies generally and particularly to Policy 14, Policy 15, Policy FW.3 Policy FW.6 and Policy 41.	Clarify district, city and regional councils' roles and functions regarding water quality, including the extent of mutual responsibilities.	Consistent with Wellington City Council's position on the matter.	Allow

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S25 Carterton District Council	S25.014	Oppose	General comments - regulatory policies	CDC considers that the approach of scattering climate change, indigenous ecosystems and freshwater policies throughout Chapter 4.1 makes the plan very difficult to use.	Re-label policies so that numbering is continuous, or group the CC, FW and IE policies together	Consistent with Wellington City Council's position on the matter.	Allow

<p>S30 Porirua City Council</p>	<p>S30.026</p>		<p>Policy CC.2: Travel demand management plans - district plans</p>	<p>Council opposes this policy and seeks its deletion. The policy requirement represents a piecemeal "ambulance at the bottom of the cliff" approach. It is more effective to intervene at an earlier stage in the development process by requiring:</p> <ul style="list-style-type: none"> • Regulatory land use frameworks that manage the distribution of activities across urban environments in a way that achieve Objective 3 to the NPS-UD. • The location of urban subdivisions together with subdivision design enable people to have a choice in transport modes. • Good quality urban design that ensures new developments are laid out and/or incorporate features that encourage active and public transport usage. The policy applies equally to "out of zone" development as much as "in-zone" development, and in so doing fails to incentivise or recognise the location of developments. For example, a new office building in the Porirua Metropolitan Centre Zone is already well served by active and public transport modes yet it would be required to incur consenting costs in producing a travel demand management plan as would an "out of zone" office building in a rural zone. <p>The policy also cannot address operational issues that present barriers to active and public transport usage such as ticketing policies, fares, levels of services etc. As such it alone cannot "maximise" use of public and active transport modes.</p> <p>The policy only requires that a travel demand management plan is produced. It is silent on the implementation of such plans nor what happens if the plan fails to maximise the use of public and active modes, for example due to people's preferences.</p> <p>Travel demand management plans are just a type of method to implement the policy and should be deleted from the policy. Rather, the policy needs to be</p>	<p>Delete policy. OR</p> <p>Alternatively, amend policy so that it provides appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>Policy CC.2: Travel demand management plans Increased reliance on public transport and active transport modes - district plans</p> <p>By 30 June 2025, district plans shall include objectives, policies and rules that:</p> <p>require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions; and</p> <p>minimise reliance on private vehicles.</p>	<p>Consistent with Wellington City Council's position on the matter.</p>	<p>Allow</p>
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				reframed to provide direction on increasing the use of public transport and active modes.			
S137 Greater Wellington Regional Council (GWRC)	S137.030	Support in part	Policy CC.4: Climate resilient urban areas - district and regional plans	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section: Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.	Consistent with Wellington City Council's position on the matter.	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.059	Support in part	Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and particularly in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon sink. Amendments are required to make the intent clear.	Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.	Consistent with Wellington City Council's position on the matter.	Allow

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S113 Wellington Water	S113.014	Support in part	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change - district and regional plans	Nature-based solutions are not always viable in Wellington due to its topography and spatially constrained urban environment	Amend the Policy as follows: District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design, where practicable.	Consistent with Wellington City Council's position on the matter.	Allow
S16 Kāpiti Coast District Council	S16.021	Oppose	Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting - district and regional plans	<p>The suggestion that district plans include methods to prioritise reducing greenhouse gas emissions rather than offsetting is not supported by the RMA. City and district councils do not have any functions under the RMA to manage greenhouse gas emissions or apply greenhouse gas offsetting.</p> <p>It is unclear to us why GWRC would consider it appropriate to apply a mandatory policy that district plans would be required to give effect to when there is no lawful ability to do so. The statutory underpinning for this policy (and many other policies in the plan change) do not appear to have been explored or evaluated fully in the section 32 evaluation.</p>	Delete Policy CC.8.	Inconsistent with Wellington City Council's position on the matter.	Disallow

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S137 Greater Wellington Regional Council (GWRC)	S137.015	Support in part	Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Proposed RPS Change 1 as notified does not specifically address public transport vehicle fleets reducing emissions, which is identified as an outcome in Objective CC.3 seeks (among other things) that public transport emissions are reduced by 20% from 2018 levels. However, there is no policy or method to implement this part of the objective. Policy 9 and Method CC.10, which link to Objective CC.3, should be amended to reflect this outcome sought.	Insert new clause: (d) the decarbonisation of the public transport vehicle fleet.	Consistent with Wellington City Council's position on the matter	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.017	Support in part	Policy EIW.1: Promoting affordable high quality active mode and public transport services - Regional Land Transport Plan	Amendments are required to improve readability and clarity.	Amend Policy EIW.1 as follows: The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle., by contributing to reducing greenhouse emissions.	Consistent with Wellington City Council's position on the matter	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.004	Support in part	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Amendments to wording for consistency with Policy 12. Addition of 'urban' for clarity on development referred to.	Amend Policy 14 as follows: Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, and methods including rules that, must give effect to Te Mana o te Wai and in doing so must: ... (e) Require the urban development, including stormwater discharges, earthworks and vegetation clearance to meet any limits set in a regional plan;	Consistent with Wellington City Council's position on the matter	Allow

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S137 Greater Wellington Regional Council (GWRC)	S137.005	Support in part	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Amendments are required to improve readability.	Amend Policy 18 as follows: ... (c) ensuring there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted; ... (h) ensuring freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;	Consistent with Wellington City Council's position on the matter	Allow
S113 Wellington Water	S113.017	Support in part	Policy FW.3: Urban development effects on freshwater and the coastal marine area - district plans	This policy is reliant on the definition of hydrological controls, which is a very unclear definition. Clarity would be improved by adding the suggested wording to these this clause.	Add the following to subclause FW.3(m): Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;	Consistent with Wellington City Council's position on the matter	Allow
S115 Hutt City Council	S115.046	Oppose	Policy FW.4: Financial contributions for urban development - district plans	The question of how to fund stormwater management measures is a solely a decision for territorial authorities and their communities under the Local Government Act. There are a number of different tools territorial authorities can use, one of which is financial contributions. Councils also have other funding options, such as using general revenues, targeted rates, or central government funding assistance. These decisions are best made by territorial authorities based on their local context, rather than being directed through the Regional Policy Statement. There are also a number of issues with this policy as drafted, including the lack of a definition for "fair share", the application to financial contributions levied for permitted activities, and the inaccurate note.	Delete Policy FW.4	Consistent with Wellington City Council's position on the matter	Allow

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S137 Greater Wellington Regional Council (GWRC)	S137.026	Support in part	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Amendments are required to improve clarity and consistency, and to provide certainty that for the hazard provisions to be successful in district plans they need to be linked to hazard overlays.	Amend Clause (e) and (f) in Policy 29 to read: (e) include hazard overlays , objectives, polices and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (f) include hazard overlays , objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.	Consistent with Wellington City Council's position on the matter	Allow

S158 Kāinga Ora Homes and Communities	S158.026	Support in part	Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres - district plans	Seeks a regionally consistent approach in the hierarchy of centres and therefore seeks amendments to the policy to align with those submissions (of IPI Plan Changes) and the national planning standards.	<p>Amend the policy as follows: District plans shall include policies, rules and/or methods that enable and manage a range of land use activities, including high density residential living that maintain and enhance the viability and vibrancy of:</p> <ol style="list-style-type: none"> 1. the regionally significant central business district of Wellington City centre; 2. other regionally significant centres The Metropolitan Centres of:(i) Johnsonville(ii) Kilbirnie (iii) Upper Hutt Centre (iv) Lower Hutt Centre(v) Petone (vi) Porirua (vii) Paraparaumu (viii) Masterton 3. The Town Centres locally significant centres of: (i) Kilbirnie; (ii) Mirimar; (iii) Newtown; (iv) Tawa; (v) Petone; (vi) Naenae (vii) Waterloo (viii) Mana; (ix) Johnsonville (x) Ōtaki (Township); (xi) Ōtaki (Main Road); (xii) Paraparaumu Beach; (xiii) Raumati Town (xiv) Waikanae; (xv) Featherston; (xvi) Greytown (xvii) Carterton; and (xviii) Martinborough <p>Explanation Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region for which district plans must maintain and enhance their vibrancy and vitality. The centres identified are of significance to the Wellington region's to achieve a well functioning urban environment and compact form that provides many employment opportunities, is well- served by public transport and has a high demand for housing and business activities for economic development, transport movement, civic or community investment. Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. Development and intensification of these areas will achieve a regional form that will contribute to meeting the objectives and policies of the RPS associated with climate change and land-use and transportation integration. It is also important for their prosperity and resilience in the face of social and economic change. Wellington City centre The regional central business district is the major centre in the Wellington region; the other key</p>	Consistent with Wellington City Council's position on the matter	Allow
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					centres also provide significant business, retailing and community services. This policy does not limit territorial authorities from identifying additional centres of local significance within the district plan		
S137 Greater Wellington Regional Council (GWRC)	S137.032	Support in part	Policy 32: Identifying and protecting key industrial-based employment locations - district plans	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section: Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region	Consistent with Wellington City Council's position on the matter.	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.009	Support in part	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Amendments are required to improve readability and consistency with Policy CC.1.	Amend Policy CC.9 as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and-or development have has been planned in a way that contributes to reducing greenhouse gas emissions by to-optimise optimising overall transport demand, maximising mode shift from private vehicles to public transport or active modes, and supporting the move towards low and zero-carbon modes in a way that contributes to reducing greenhouse gas emissions.	Consistent with Wellington City Council's position on the matter.	Allow

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S113 Wellington Water	S113.036	Not Stated / Neutral	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	<p>Consideration of the matters in clauses (p) and (q) of Policy 42 should also apply to District Plans as they control the form of development and are more commonly used than regional plans. Then developers can be made aware of source water protection area risks earlier in their process, increasing the potential for a good outcome.</p>	<p>Insert new Policy 42A as follows: Policy 42A: Effects on freshwater from urban development - district plans District plans shall include policies and methods to:</p> <p>(a) Support and achieve efficient end use of reticulated water, and alternate water supplies for non-potable uses</p> <p>(b)Where appropriate, protect drinking water sources from inappropriate use and development by use of policies and overlays advising of the restrictions in the Regional Plans and recommending early engagement with GW. This is supported by a non-regulatory method that District and City council staff will advise of the drinking water protections in the regional plan via LIMs and PIMs, responses to public enquiries and preapplication meetings.</p>	Inconsistent with Wellington City Council's position on the matter.	Disallow

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S137 Greater Wellington Regional Council (GWRC)	S137.040	Support in part	Policy 55: Providing for appropriate urban expansion - consideration	<p>Amendments are required to improve readability, consistency and clarity, including fixing references to policy numbers. Add 'improving' into clause (a) for consistency with Policy 31. Ensure reference to 'low and zero-carbon multi modal transport' is consistent with other provisions.</p> <p>Amendment of the wording of clause (a)(ii)(1) is required to amend an error, in that the notified version uses the language from an older version of Policy 29.</p> <p>Amendments are also required to align with the National Policy Statement for Highly Productive Land 2022. NPS-HPL Policy 2 requires that the identification and management of highly productive land is undertaken in an integrated way, considering interactions with freshwater and urban development.</p>	<p>Amend Policy 55 as shown below: When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region's urban areas (as at March 2009 August 2022), particular regard shall be given to whether:</p> <p>(a) the urban proposed development is the most appropriate option to achieve Objective 22 contributes to establishing, improving or maintaining the qualities and characteristics of a well-functioning urban environment, including:</p> <p>(i) the urban development will be well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors;</p> <p>(ii) the location, design and layout of the proposed development shall apply applies the specific management or protection for values or resources identified by this Regional Policy Statement RPS, including by:</p> <p>1. Avoiding inappropriate Managing subdivision, use and development in accordance with the risk areas at from natural hazards as required by Policy 29;</p> <p>... 6. Providing Supporting for climate resilience and supporting a low and zero-carbon multi modal transport network consistent with Policies CC.1, CC.4, CC. 940 and CC147;</p> <p>... 9. Protecting highly productive land for use in land-based primary production consistent with Policies 56 and 59; and</p> <p>...</p> <p>the Any urban development that would provide for significant development capacity as outlined in Policy UD.3, regardless of if the development was out of sequence or unanticipated by growth or development strategies.</p> <p>Explanation ... <u>Clause (a) also aligns with direction from the National Policy Statement for Highly Productive Land 2022 to protect highly productive land for use in land-based primary production.</u></p>	Consistent with Wellington City Council's position on the matter.	Allow

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S137 Greater Wellington Regional Council (GWRC)	S137.036	Support in part	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.	Consistent with Wellington City Council's position on the matter.	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.048	Support in part	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Amendments are required to improve readability, consistency and clarity, and reduce duplication. Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.	Amend Policy UD.3 as shown below: Policy UD.3: Responsive planning to unanticipated or out-of-sequence developments that provide for significant development capacity - consideration	Consistent with Wellington City Council's position on the matter.	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.049	Support in part	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Add 'improving' into clause (a)(i) for consistency with Policy 31.	Amend clause (a)(i) to read: (a) the location, design and layout of the proposal: (i) contributes to establishing, improving or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22;	Consistent with Wellington City Council's position on the matter.	Allow

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	Sub no./ point no.	Submitter 's position	Provision				
S137 Greater Wellington Regional Council	S137.050	Support in part	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p> <p>Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.</p>	Amend clause (c)(ii) to read: (ii) is likely to will be realised in a timely (i.e., rapid) manner, and earlier than the anticipated urban development ;	Consistent with Wellington City Council's position on the matter.	Allow
S137 Greater Wellington Regional Council	S137.051	Support in part	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p> <p>Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer</p>	Delete clause (c)(iii)	Consistent with Wellington City Council's position on the matter.	
S137 Greater Wellington Regional Council (GWRC)	S137.052	Support in part	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p> <p>Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.</p>	Amend clause (c)(iv) to read: (iv) (iii) will facilitate a net increase in district-wide development uptake up-take in the short to medium term;	Consistent with Wellington City Council's position on the matter.	Allow

I support/oppose the submission of:	The particular part/s of the submission I allow/disallow are:			Original Reasons:	Original Decision Requested:	The reasons for my support/ opposition are:	I seek that the whole (or part) of the submission be allowed/ disallowed:
	Sub no./ point no.	Submitter 's position	Provision				
S137 Greater Wellington Regional Council (GWRC)	S137.053	Support in part	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p> <p>Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.</p>	Amend clause (d) to read: (d) the required development infrastructure can be provided effectively and efficiently for the proposal, and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term.	Consistent with Wellington City Council's position on the matter.	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.054	Support in part	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p> <p>Policy UD.3 is necessary to ensure a pathway for out-of-sequence development is available, as required by the National Policy Statement for Urban Development 2020. Amendments are suggested to make the policy intent clearer.</p>	Amend policy to read: When considering a change of a district plan for a development, to determine whether it provides significant development capacity in accordance with clause (d) of Policy 55, particular regard shall be given to whether all of the following criteria is are met.	Consistent with Wellington City Council's position on the matter.	Allow
S158 Kāinga Ora Homes and Communities	S158.030	Support in part	Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	Seeks that this policy is amended to be in line with the NPS-FM and NES-F.	Amend policy to be in line with the NPS-FM and NES-F: (b) In relation to wetlands, Wellington Regional Council is responsible for managing land use within, and within a 100m setback margin of natural wetlands as directed by the NES-F 2020, as well as areas adjoining and/or upstream for the purpose of protecting wetlands	Consistent with Wellington City Council's position on the matter	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.057	Support in part	General comments - non-regulatory methods	Greater Wellington considers a new non-regulatory method to support Policy CC.11 is required. This will assist with implementation of the policy.	Under Chapter 4.5.2 - Non-regulatory methods - information and guidance, insert a new method CC.3A as follows: Method CC.3A - Whole of life carbon emissions assessments Develop information to support the development of whole of life carbon emission assessments, in accordance with Policy CC.11.Implementation: Wellington Regional Council	Consistent with Wellington City Council's position on the matter	Allow

I support/oppose the submission of:	The particular part/s of the submission I allow/disallow are:			Original Reasons:	Original Decision Requested:	The reasons for my support/ opposition are:	I seek that the whole (or part) of the submission be allowed/ disallowed:
	Sub no./ point no.	Submitter 's position	Provision				
S137 Greater Wellington Regional Council (GWRC)	S137.012	Oppose	Method CC.2: Develop carbon emissions offsetting guidance	This method is no longer necessary. It was developed to implement an earlier iteration of Policy CC.8, which took a more complex approach to dealing with offsetting. Policy CC.8 (as notified) does not require a method requiring offset guidelines to be developed as it prioritises reducing emissions over offsetting.	Remove Method CC.2 from Proposed RPS Change 1.	Consistent with Wellington City Council's position on the matter.	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.056	Support in part	Method UD.2: Future Development Strategy	Amend to explicitly require consideration of the impacts of climate change in the preparation of the Future Development Strategy, to implement Objective CC.1 and Policy 55.	Amend Method UD.2 as below: ... The Future Development Strategy will provide a framework for achieving Well-Functioning Urban Environments in the Wellington Region, including specifying how and where future growth will occur to provide for sufficient capacity to meet future growth needs over the next 30 years, and considering the impacts of climate change.	Consistent with Wellington City Council's position on the matter.	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.061	Support in part	Method CC.4: Prepare a regional forest spatial plan	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and particularly in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon sink. Amendments are required to make the intent clear.	Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.	Consistent with Wellington City Council's position on the matter	Allow

I support/oppose the submission of:	The particular part/s of the submission I allow/disallow are:			Original Reasons:	Original Decision Requested:	The reasons for my support/ opposition are:	I seek that the whole (or part) of the submission be allowed/ disallowed:
	Sub no./ point no.	Submitter's position	Provision				
S137 Greater Wellington Regional Council (GWRC)	S137.016	Support in part	Method CC.10: Establish incentives to shift to active and public transport	<p>The notified heading does not reflect the method as well as it could.</p> <p>A minor change to ensure 'low and zero-carbon' is consistently referred to, and to reflect the direction to decarbonise public transport included in Policy 9.</p>	<p>Amend Method CC.10 as follows: Method CC.10: Establish incentives to shift to low and zero-carbon multi modal transport active and public transport Establish, support and promote a range of incentives for uptake of low and zero-carbon zero and low-carbon multi modal transport, including public transport, to reduce greenhouse gas emissions, and to support an equitable and inclusive transition.</p>	Consistent with Wellington City Council's position on the matter	Allow
S137 Greater Wellington Regional Council (GWRC)	S137.064	Support in part	Greenhouse gases	Amend definition for greenhouse gases to refer to greenhouse gas emissions, to support the removal of the definition for emissions.	<p>Amend the definition to read:</p> <p>Greenhouse Gases Emissions Atmospheric gases that trap or absorb heat and contribute to climate change. The gases covered by the Climate Change Response Act 2002 are The release of carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), or sulphur hexafluoride (SF6) into the atmosphere, where they trap heat or radiation and contribute to climate change.</p>	Consistent with Wellington City Council's position on the matter.	Allow

I support/oppose the submission of:	The particular part/s of the submission I allow/disallow are:			Original Reasons:	Original Decision Requested:	The reasons for my support/ opposition are:	I seek that the whole (or part) of the submission be allowed/ disallowed:
	Sub no./ point no.	Submitter 's position	Provision				
S113 Wellington Water	S113.051	Oppose	Hydrological controls	<p>The purpose of the definition is unclear. The intent might be better served by creation of a policy, rather than a definition.</p> <p>The following issues need to be addressed:</p> <ul style="list-style-type: none"> The definition refers to annual means rather than annual peaks The practicability test for brownfield and infill developments may be better served with a more specific target It is unclear whether the modelling is based on an undeveloped state or the surrounding catchment also being in an undeveloped state? This would affect water flowing onto the site and water attenuation It is unclear what purpose the (a) clauses serve. The (b) clauses re to address stream scour that adversely impacts aquatic ecosystem health. If the (a) clauses are trying to achieve a different outcome to the (b) clauses, then this should be reflected in the policies. Currently the policies are only referring to one outcome, related to stream form. 	<p>The following issues need to be addressed:</p> <ul style="list-style-type: none"> Refer to annual means rather than annual peaks Include a more specific target in the practicability test for brownfield and infill developments. <p>Clarify whether modelling is based on an undeveloped state or the surrounding catchment also being in an undeveloped state.</p> <ul style="list-style-type: none"> Clarify the purpose of clause (a) and how it is different to clause (b) <p>OR</p> <p>Create as a policy, rather than a definition.</p>	Consistent with Wellington City Council's position on the matter.	Allow

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

Who can make a Further Submission:

A further submission may only be made by a person who:

- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

- Online using our submission portal *Spoken*, at: <https://tinyurl.com/gwrc-rps-change-furthersubs>
- Email your Further Submission and this completed form to: regionalplan@gw.govt.nz
- Post your Further submission and this completed form to: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser. **N.B. Due to delays in postal services and the timeframe for making Further Submissions we highly recommend that an electronic copy of your Further Submission is provided by the closing date OR delivered to one of our offices.**
- Drop your Further Submission and this completed form to reception at one of Greater Wellington's offices.

(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter	
Name (First and Last) OR Organisation / Company : Masterton District Council	
Address for Service (Email OR Postal Address): PO Box 444 Masterton, 5810 Phone : 06 370 6300	
Contact name and postal address for service of person making submission : Nerissa Aramakutu (If different from above)	
Only certain people may make further submissions Please tick the option that applies to you:	
<input type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input checked="" type="checkbox"/>	I am the local authority for the relevant area.
Specify below the grounds for stating that you are within the category you have ticked: <hr/> Masterton District Council is one of the local authorities in the Wairarapa	

2. Appearance at hearing Please select from the following:

<input type="checkbox"/>	I do not wish to be heard in support of my further submission; or
<input checked="" type="checkbox"/>	I do wish to be heard in support of my further submission; and, if so,
<input type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearing

3. For the further submitter to action

Service of your further submission:

Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**

Each submitter has an address for service available at: <https://www.gw.govt.nz/rps-pc-1-submissions>

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: _____ **Date:** _____

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

All Further Submissions (including name and address for service) are made publicly available on our website. Your name and address for service will be used for correspondence during the hearing process. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

Please enter further submission points in the table on the following pages

4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

Submitter name or, Submitter number of the submission you are commenting on:	Submission point number: <i>Identified in the summary of decisions requested table</i>	Stance on the submission point: (Support, Oppose, Support in part, or Oppose in part)	Reasons: <i>Why you support or oppose this point</i>	Decision sought: (Allow, Disallow, Allow in part, or Disallow in part) <i>Identify the whole or part(s) of the submission point that this is in reference to</i>
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.007	Support in part	Agree with the following: It is not only the resilience of communities and the natural environment that need strengthening against the adverse effects of climate change. Infrastructure including regionally significant infrastructure should also be resilient and should have explicit mention under Objective CC.6.	Agree with relief sought as follows: Objective CC.6: Resource management and adaptation planning increase the resilience of communities, infrastructure (including regionally significant infrastructure) and the natural environment to the short, medium, and long-term effects of climate change.
Carterton District Council	S25.002	Support	Agree with CDC's reasons regarding uncertainty on how consistency of this objective will be addressed.	Agree with CDC's decision requested that better guidance on how this objective and related policies should be implemented by district councils.
Carterton District Council	S25.008	Support		Agree with CDC's decision requested that funding is allocated to the implementation of this objective.
Carterton District Council	S25.019	Support		Agrees with CDC's decision requested to amend the policy so that permanent forest is not encouraged on highly productive land, and to provide a more supportive policy framework for this when a variation is prepared to respond to the NPS-HPL.
Carterton District Council	S25.023	Support		Agrees with CDC's decision requested to remove reference to district plans from this policy so that the requirements only apply to regional plans.
Director General of Conservation	S32.002	Support in part	Agree with the following: Amend as follows, or words to like effect: "(c)protects and enhances mana whenua / tangata whenua values, in particular Mahinga kai; and(d) protects and enhances the life-supporting capacity of the environment; and..."	Further clarity is needed to explain what this looks like in practice, and what guidance will be provided to district councils.
Greater Wellington Regional Council	S137.058	Support in part	Agree with: The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and particularly	Agree with relief sought: Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region

			in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon sink. Amendments are required to make the intent clear.	that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.
Greater Wellington Regional Council	S137.014	Support in part	Agree with: Proposed RPS Change 1 as notified does not specifically address public transport vehicle fleets reducing emissions, which is identified as an outcome in Objective CC.3 seeks (among other things) that public transport emissions are reduced by 20% from 2018 levels. However, there is no policy or method to implement this part of the objective. Policy 9 and Method CC.10, which link to Objective CC.3, should be amended to reflect this outcome sought.	Agree with relief sought: Amend Policy 9 as follows: The Wellington Regional Land Transport Plan shall include objectives and policies that promote: ... (c) increasing the uptake of low emission or zero carbon fuels, biofuels and new technologies.; and Insert new clause: (d) the decarbonisation of the public transport vehicle fleet.
Greater Wellington Regional Council	S.137.25	Support in part	Agree with: Amendments are required to improve clarity and consistency, and to provide certainty that for the hazard provisions to be successful in district plans they need to be linked to hazard overlays.	Agree with relief sought: Amend Clause (d) of Policy 29 as follows: ... (d) use a risk-based approach to assess the consequences to new or existing subdivision, use and development from natural hazard and climate change impacts over a 100 year planning horizon;
Kāinga Ora Homes and Communities	S158.020	Support in part	Agree that further clarification is needed as to Regional Plan functions vs. District Plan functions under Policy 15.	Agree with the specific point made by Kāinga Ora that the regional and district plan functions need to be separated and amended under the policy.
Kāinga Ora Homes and Communities	S.158.021	Support in part	Agree with: Seeks that the policy is amended to remove the requirement to improve the efficiency of the end use of water on a per capita basis. Seeks that the policy rather seek for the inclusion of water efficient methods are installed per new household or alternative solutions are provided within larger developments where more efficient solutions that are more 'nature-based' could be used. e.g. community rain gardens, stormwater ponds.	Agree with relief sought: Amend the policy as follows: District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable: (a) provisions improving the efficiency of the end use of water on a per capita basis for new developments per new household equivalent through devices such as low flow fixtures; and (b) provisions improving the efficiency of the end use of water at a community scale for large scale developments; and (c) provisions requiring alternate water supplies for non-potable use in new developments.

Meridian Energy Limited	S100.006	Support in part	Agree with: It is not only the resilience of communities and the natural environment that need strengthened resilience against the adverse effects of climate change. Infrastructure, including regionally significant infrastructure is particularly vulnerable to climate change effects and represents considerable financial investment that is critical to the resilience of communities. It warrants explicit mention in Objective CC.6.	Agree with relief sought: Insert into Objective CC.6 reference to infrastructure, including regionally significant infrastructure: "Resource management and adaptation planning increase the resilience of communities, infrastructure (including regionally significant infrastructure) and the natural environment to the short, medium, and long-term effects of climate change."
Rangitāne o Wairarapa	S168.020	Support		Agrees with RoW decision requested seeking that tangata whenua are co-governing, co-managing and co-designing solutions for our future with our communities.
Rangitāne o Wairarapa	S168.0134	Support		Agrees with addition of "cultural" as an amendment to this policy.
Rangitāne o Wairarapa	S168.0151	Support		Mana whenua should be a partner in preparing the regional forest spatial plan.
Sustainable Electricity Association of NZ (SEANZ)	S117.006	Support	Agree with: The suite of "CC" policies fails to include recognition of / support for the role that renewable generation will play in reducing greenhouse gas emissions.	Agree with the relief sought: General support for these policies but strengthen to give effect to 'Option 3' from the section 32 analysis.
South Wairarapa District Council	S79.001	Support in part	Agree with: 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.	Agree with relief sought: Ensure the objective is supported by a more detailed assessment of benefits and costs.
South Wairarapa District Council	S79.002	Support in part	Agree with: The Objective is generally supported. However, it is not sufficiently robust enough to ensure that rural 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 recognize 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,	Agree that the burden of transitioning to a low emission region does not disproportionately fall on rural communities.

			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.	
South Wairarapa District Council	S79.006	Support	Agree with: 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	Agree with relief sought: 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 . [End of amendments to Objective CC.6] Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.
South Wairarapa District Council	S79.009	Support in part	Agree with: 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.	Agree with relief sought: Amend Objective 16 as follows: Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are 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
South Wairarapa District Council	S.79.016	Support in part	Agree with: 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 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	Agree with the relief sought: 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: (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

			<p>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.</p> <p>Competitive land markets</p> <p>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.</p> <p>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.</p> <p>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 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.</p> <p>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.</p> <p>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.</p> <p>It is unclear why the whole objective must go through the Freshwater Planning process.</p>	<p>and quantity of freshwater; and</p> <p>(e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity can be met; and</p> <p>(f) Support the transition to a low- emission and climate-resilient region; and</p> <p>(g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and</p> <p>(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 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</p> <p>(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.</p> <p>[End of amendments to Objective 22]</p> <p>Or, similar relief to the same effect;</p> <p>AND;</p> <p>Any consequential amendments to give effect to the relief sought.</p> <p>And;</p> <p>Separate out matters in the objective that are required to go through the Freshwater Planning Process from those that need not.</p>
South Wairarapa District Council	S.79.018	Support in part	<p>Agree with:</p> <p>It is unclear as to the degree of change that can be undertaken by the South Wairarapa District in particular that;</p>	<p>Agree with Relief sought:</p> <p>Amend Policy CC.1 as follows:[<i>Note no change from Policy CC.1 shown in submission point</i>]</p>

			<p>a. The towns of the South Wairarapa are largely 'walkable' and 'cyclable' already for those who are able bodied;</p> <p>b. Very little regional funding for public transport is provided to the South Wairarapa;</p> <p>c. It is unclear how the large network of rural transport infrastructure in the rural environment can be amended to achieve the outcomes sought;</p> <p>d. There are limited or no alternatives provided for agricultural and forestry transport in the near future;</p> <p>e. Assumes alternatives are available for those who are aged, have limited mobility, have fixed/low incomes. Managing in this manner may be piecemeal and lead to sub-optimal outcomes. More strategic network wide assessments need to be undertaken and priorities set that was rather than imposing change on an ad-hoc basis.</p> <p>While the intent of this policy is supported, applying the requirements in (a)-(c) to all new and altered transport infrastructure does not allow for the scale or type of the alterations to be considered.</p> <p>For example, an alteration to transport infrastructure could comprise a new roundabout, or creation of a heavy vehicle bypass - there are many types of alterations where consideration of these matters would not be appropriate, either because the alteration is minor in nature, or because it provides greater efficiency for the wider transport network - but not necessarily for zero- or low-carbon modes. While there might be flow-on effects (e.g. a heavy vehicle bypass might make other urban streets more attractive for active modes), these would not necessarily meet the criteria in (b) and (c).</p>	<p>District and regional plans shall include objectives, policies, rules and/or methods to require that all new and altered transport infrastructure is designed, constructed, and operated in a way that contribute to reducing greenhouse gas emissions by:</p> <p>(a) Optimising overall transport demand;</p> <p>(b) Maximising mode shift from private vehicles to public transport or active modes; and</p> <p>(c) Supporting the move towards low and zero-carbon modes.</p> <p>[End of amendments to Policy CC.1]</p> <p>AND;</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought.</p>
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South Wairarapa District Council	S79.021	Support in part	<p>Agree with: Submission relates to Policy CC.4. The purpose of the policy is unclear. The policy refers to matters that are included for a Freshwater Planning Process, but is not of itself considered part of it. This is confusing and will complicate the hearing process. It is arguable that parts of CC.14 do not either directly or indirectly relate to freshwater matters contained in the NSP FM and therefore should be open to the standard schedule 1 process.</p> <p>While noting TA's functions in s.31 (b)(i), construction standards of buildings is a matter appropriately and adequately managed by the Building Act.</p>	<p>Agree with relief sought: 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 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 [End of amendments to Policy CC.4] Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.</p>
South Wairarapa District Council	S79.025	Support	<p>Agree with: 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.</p>	<p>Agree with relief sought: Retain as notified</p>
South Wairarapa District Council	S79.26	Support in part	<p>Agree with: It is unclear what 'low and zero carbon regionally significant infrastructure' might include, and how this might be assessed.</p>	<p>Agree with: Amend the explanation so that it is clear what is meant by 'low and zero carbon regionally significant infrastructure';</p>

South Wairarapa District Council	S79.028	Support in part	<p>Agree with: This policy is generally supported in that the matters contained within it are best managed or directed by a Regional Authority and their functions under s.30 of the RMA. Similarly, the roles of TA's, including as owners and operators of infrastructure, ensures that the matters can be addressed as conditions attached to consents, particularly for stormwater.</p> <p>Council does have concerns that any required planting for open water races in an urban setting would preclude maintenance and result in overtopping or counterintuitive outcomes for water quality.</p> <p>Council would support the development of good practice guidelines and engineering standards to assist implementation where they are not currently available.</p>	<p>Agree with relief sought: Retain as notified Include method that develops non- regulatory guidance on good practice to achieve the policy.</p>
South Wairarapa District Council	S79.029	Support in part	<p>Agree with: The policy is written in a manner that holds TA's responsible for meeting freshwater targets and limits in regional plans. this is not the function of Territorial Authorities under s.31 of the RMA to manage the use of land to achieve water quality and quantity attribute states. Similarly, this is not within the scope of 3.5(3) of the NPS which looks to 'promote positive effects' and avoid, remedy, mitigate for general health and wellbeing, not to achieve target and limits.</p> <p>TA's contributions to meeting NPS FM is adequately addressed above in the amended Policy 14 and FW.1 as part of GWRC discharge consent decisions and other regional plan matters.</p> <p>Further, much of the activities requires by the policy is managed by not only the regional plan but also the NES F. Duplication where this is required by both TA's and RC's inefficient and doesn't meet s.32.</p> <p>It is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m²). SWDC does not have the capacity to undertake an</p>	<p>Agree with the relief sought: Remove the requirement in Policy 15 for TA's to manage activities to achieve attribute states.</p>

			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.	
South Wairarapa District Council	S79.041	Support	Agree with: 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.	Agree with the need to consider solutions that ensures afforestation is not forced on rural communities.
Sustainable Wairarapa	S.144.015	Support	Agree with: It is vital that the indigenous ecosystems and habitats of the region are maintained as our biodiversity continues to decline. It is important that somewhere in the document, the need for controlling pest animals and plants is highlighted. Ideally funding needs to be found to restore our indigenous ecosystems - if pest species are removed from remnants, these systems can bounce back.	Agree with relief sought: Retain as notified
Sustainable Wairarapa Inc	S144.031	Support	Agree with: Engaging people in the changes will be essential to successfully reducing emissions. Many low-cost and simple methods are available, from kerbside composting to public-facing foot printing services.	Agree with relief sought: Retain as notified.
Waka Kotahi NZ Transport Agency	S129.002	Support in part		Agree with the <u>decision requested</u> by Waka Kotahi re. Further clarification needed of how low emission and climate mitigation and adaptation is defined.
Waka Kotahi NZ Transport Agency	S129.028	Support in part	Agree with Waka Kotahi that it is important to have integrated transport, land use planning and multi-modal transport But agree, further clarification is required with how the Policy is to be implemented.	Agree with Waka Kotahi re: Seeking clarification on how Policy 58 will be implemented.
Waka Kotahi NZ Transport Agency	S129.012	Support	MDC is supportive in principle but agrees with Waka Kotahi that there is a lack of clarity as to how this will be implemented.	Agree with Waka Kotahi re: Seeking clarification on this will be implemented.
Waka Kotahi NZ Transport Agency	S129.043	Support in part	Agree in principle, more guidance would be useful around the use of transport pricing tools under Method CC.7. Agree with Waka Kotahi that further direction is required from central government before being able to support this method.	Agree with Waka Kotahi that: There needs to be alignment / guidance with the direction from Central Government.

Waka Kotahi NZ Transport Authority	S.129.019	Support	Agree with Supports the Regional Council providing direction to territorial authorities to receive Financial Contributions to manage actual effects	Agree with relief sought: Retain as notified.
Waka Kotahi NZ Transport Agency	S129.004	Support	Agree with: Supports the costs and benefits of transitioning to low carbon being shared fairly.	Agree with relief sought: Seeks clarification of how the costs and benefits will be shared.
Wellington City Council	S140.030	Support	Agree with WCC that: <ul style="list-style-type: none"> the lack of specificity will lead to inconsistencies in the approach across the region and create tension between the intended outcome of this policy and the practical implementation carried out by Territorial Authorities. when looking at the definition of a 'travel demand management plan', the policy will likely result in the consideration of the individual development only, which has the risk of ignoring region-wide pressures. Policy CC.2 also reads as being more appropriate as a consideration policy, where having a more flexible approach is enabled and can be utilised more effectively by a Territorial Authority. 	Agree with WCC re: <ul style="list-style-type: none"> Delete policy CC.2 and the integrate the Policy into the Regional Land Transport Plan. Or Amend Policy CC.2 to be a consideration policy with clearer direction on the outcomes being sought.
Wellington City Council	S140.032	Support	Agree with WCC that: <ul style="list-style-type: none"> This policy is not sufficiently clear for policy statement users to understand what is required. Policy direction is unclear as to what the RPS is intending, particularly as resilience in relation to climate change is not defined in the RPS. The Explanation reads as policy direction rather than a requirement to provide additional information and should be included in the main section of the policy. 	Agree with WCC re: <ul style="list-style-type: none"> Amend to clarify and refine policy Amend Policy to include a portion of the explanation in the Policy section.
Wellington City Council	S140.045	Support in part	Agree with reasons that WCC have outlined.	We don't support deleting the policy but agree with some of the points WCC have raised regarding Policy FW.2
Wellington City Council	S140.046	Support in part	Agree with WCC that: <ul style="list-style-type: none"> Vegetation clearance and earthworks in the riparian margin has a direct effect on the water quality of the waterbody, therefore the land use and subsequent discharge of sediment laden material should be managed by Regional Council. Otherwise, development would need to go to the relevant territorial authority for the s9 consent and then to 	Agree with points made by WCC regarding regional council responsibilities.

			<p>GWRC for the s15 discharge consent. This would not promote integrated management.</p> <ul style="list-style-type: none"> The effects of the development on drinking water sources should be managed by Regional Council with the identification of Drinking Protection Zones and relevant requirements for discharge consents. The piping of rivers is a s13 matter that should be managed by Regional Council. <p>Water efficiency is also managed by Regional Council under s14 of the RMA and is unclear how s9 would have any influence on water use.</p>	
Toka Tu Ake EQC	S.132.012	Support in part	<p>Agree with</p> <p>It is important that policies to increase resilience to natural hazards and the effects of climate change are consistently applied throughout the region. As such we recommend that the Regional Council provide guidance on identification of high risk areas and application of the policies in this RPS</p>	<p>Agree with relief sought:</p> <p>Re-instate the phrase: " Prepare and disseminate information about how to identify areas at high risk from natural hazards, as relevant to the development of hazard management strategies to guide decision- making"</p>
Sustainable Wairarapa	S144.050	Support	<p>Agree with:</p> <p>The vast majority of the public water supplies are sourced from the ranges. It is important to shield this source from natural hazards. This will require management to ensure the fabric of the ranges is maintained. Also that understanding where possible new sources may be tapped will require substantial investigation. At present there is no specific work to protect the water sources for Wairarapa towns in the Tararua Ranges within the DoC estate. DoC, iwi, GWRC and district councils should develop a working arrangement to ensure these water sources receive best practice protection</p>	<p>Agree with relief sought:</p> <p>Retain as notified</p>
South Wairarapa District Council	S.79.050	Support	<p>Agree with:</p> <p>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</p>	<p>Agree with relief sought:</p> <p>Retain as notified</p>
Waka Kotahi NZ Transport Agency	S129.043	Support in part	<p>Agree with:</p> <p>Agrees in principle with the behaviour change being sought however believe that further direction is required from central government before being able to support this method.</p>	<p>Agree with relief sought:</p> <p>Seeks alignment with the direction from Central Government.</p>
South Wairarapa District Council	S79.052	Support in part	<p>Agree with:</p> <p>The method is appropriate but it should include partnering with appropriate stakeholders.</p>	<p>Agree with relief sought:</p> <p>Amend the chapeau of Policy CC.8 to include that this method is undertaken in conjunction with stakeholders.</p>

Sustainable Wairarapa	S144.025	Support	Agree with: Assistance is needed by care-groups and landowners to care for indigenous ecosystems. Nature based solutions offer a wide range of benefits to be provided compared to grey/hard infrastructure. (see policy FW.7)	Agree with relief sought: Retain as notified.
Waka Kotahi NZ Transport Agency	S129.013	Support in part	Agrees with: Generally supports, including that the policy promotes modal choice including active modes, and encourages consideration of the accessibility needs to the community. It is however noted that the current wording can be interpreted to suggest that the onus falls on transport infrastructure providers to provide the incentives to achieve the outcomes of this method. Much of this can be achieved through utilizing the Regional Land Transport Plan process to identify activities to be put forward for funding.	Agree with relief sought: Seeks to amend wording to provide clarity on the responsibilities to achieve Method CC.10.
Wellington City Council	S140.0116	Support in part	Agree with: Requiring just the consideration of rates rebates is restrictive and may not necessarily be the best option to assist landowners to maintain, enhance and restore indigenous ecosystems.	Agree with relief sought: Assist landowners to maintain, enhance and/or restore indigenous ecosystems identified by Methods IE.2 and CC.7, including by, but not limited to: (a) assisting with the costs of legally protecting indigenous ecosystems by way of open space covenants with Queen Elizabeth the Second National Trust (QEII);(b) considering opportunities for rates rebates;(b) considering opportunities for an incentive packages; (c) assisting with the costs of controlling pest plants and animals; and (d) supporting landowners to restore significant indigenous ecosystems by fencing and planting
Wellington City Council	S140.0125	Support in part	Agree with: Actions such as planting street trees and water sensitive urban design are not enhancing natural ecosystems as they are often isolated from other areas of biodiversity and serve a different function than the 'natural ecosystem' would perform. The definition should not include examples as that should be incorporated into the implementation (method) of the policy.	Agree with relief sought: Amend: Actions to protect, enhance, mimic, or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce greenhouse gas emissions and/or strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects climate change.
Wellington City Council	S140.0126	Support in part	Agree with: Part of the definition reads as policy and should be incorporated into the relevant policy/method or be removed	Agree with relief sought: Amend: A travel demand management plan sets out interventions and actions to influence travel behaviour, with the aim of minimising travel demand or redistributing demand from traditional car usage to more sustainable transport modes for new subdivision, use and development. A travel demand management plan should include mitigation measures that so that planned subdivision, use and development is designed and implemented to maximise quality of life for people without access to a private vehicle,

				reducing the demand for vehicle trips and associated externalities like greenhouse gas emissions. For example, a travel demand management plan for a new retail development might promote cycle parking facilities and a delivery service, as an intervention to promote travel with low carbon emissions.
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Add further pages as required

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)

Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. The closing date for Further Submissions is 5pm Monday 19 December 2022.

1. Details of further submitter

Name Organisation / Company: DairyNZ

Address for Service: anna.sing@dairynz.co.nz Phone: 0274588546

Optional Contact name and postal address for service of person making submission: David Cooper, david.cooper@dairynz.co.nz, 0211975608

Only certain people may make further submissions Please tick the option that applies to you:

	I am a person representing a relevant aspect of the public interest
X	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission)
	the local authority for the relevant area.
Grounds:	DairyNZ is making this Further Submission because, as the industry good organisation representing New Zealand's dairy farmers, it has an interest in the proposed plan which is greater than the general public's interest.

2. Appearance at hearing Please select from the following

	I do not wish to be heard in support of my further submission
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X	I do wish to be heard in support of my further submission; and, if so,
X	I would consider presenting a joint case with others making a similar further submission at any hearing

3. For the submitter to action

Service of your further submission:

Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.

Each submitter has an address for service available at: <https://www.gw.govt.nz/rps-pc-1-submissions>

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: David Cooper	Date: 19/12/22
Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means	

4. Further submission points

The following table details which original submission points DairyNZ supports and/or opposes, and why.

Submitter	Submission Point number	Stance on the submission point: (Support, Oppose, Support in part, or Oppose in part)	Reasons: Why you support or oppose this point	Decision sought: (Allow, Disallow, Allow in part, or Disallow in part) Identify the whole or part(s) of the submission point that this is in reference to
S25 Carterton District Council	S25.018	Support in part	DairyNZ support the concerns raised around lack of clarity in implementation and lack of clarity and potential misalignment with Government policy.	Allow

S30 Porirua City Council	S30.029	Oppose	The submitter does not recognise that agricultural emissions will be subject to regulation, underlining DairyNZ's concern that any provisions associated with management of agricultural emissions should be deleted until there is clarity of policy settings.	Disallow
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.036	Support in part	DairyNZ support the concerns raised around implementation and alignment with Government policy. However, we consider the appropriate response is to delete the policy and related provisions.	Allow in part <i>Delete the policy in its entirety</i>
S79 South Wairarapa District Council	S79.022	Support in part	DairyNZ support the concerns raised around implementation and lack of impact analysis	Allow in part <i>Delete Policy CC.5</i>
S163 Wairarapa Federated Farmers	S163.046	Support	DairyNZ agrees with the concerns expressed by the submitter, and relief sought.	Allow
S167 Taranaki Whānui	S167.065	Oppose	DairyNZ considers this policy should be deleted until there is greater clarity on regulation of emissions at a national level, and a more complete analysis of the proposed provisions is undertaken.	Disallow
S168 Rangitāne O Wairarapa Inc	S168.0119	Oppose	DairyNZ considers this policy should be deleted until there is greater clarity on regulation of emissions at a national level, and a more complete analysis of the proposed provisions is undertaken.	Disallow
S137 Greater Wellington Regional Council (GWRC)	S137.002	Oppose	DairyNZ considers further community engagement is required to determine freshwater visions at the FMU scale.	Disallow
S137 Greater Wellington Regional Council (GWRC)	S137.003	Oppose	DairyNZ considers further community engagement is required to determine freshwater visions at the FMU scale.	Disallow
S163 Wairarapa Federated Farmers	S163.022	Support	DairyNZ agrees further community engagement is required to determine freshwater visions at the FMU scale, and that the proposed amendments to Chapter 3.4 should be deleted.	Allow

S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.019	Oppose	DairyNZ does not agree that freshwater visions should be set for the region as a whole. Clause 3.3 (2) of the NPS-FM makes it clear that freshwater visions should be set at the FMU, part of the FMU or catchment levels. Clause 3.3(3) makes it clear freshwater visions should be developed through engagement with communities and tangata whenua.	Disallow
S163 Wairarapa Federated Farmers	S163.023	Support	DairyNZ agrees with the submitters concerns and the relief sought.	Allow
S79 South Wairarapa District Council	S79.041	Support in part	DairyNZ support the concerns raised around implementation and lack of impact analysis, however we consider the policy and related provisions should be deleted, rather than redrafted.	Allow in part <i>Delete Policy CC.13</i>
S128 Horticulture New Zealand	S128.061	Oppose in part	DairyNZ agrees with the proposal to develop a nonregulatory programme to support farmer decision making around transitioning to alternative land uses However, we consider any provisions related to climate change emissions directed towards to the agricultural sector should be deleted and revisited once there is greater clarity around national direction, and there has been more appropriate analysis of how the PRPS should respond to this.	Disallow
S115 Hutt City Council	S115.014	Support	DairyNZ agrees that Council should defer provisions related to biodiversity until the National Policy Statement on Indigenous Biodiversity has been gazetted.	Allow
S163 Wairarapa Federated Farmers	S163.026	Support	DairyNZ agrees that Council should defer provisions related to biodiversity until the National Policy Statement on Indigenous Biodiversity has been gazetted.	Allow
S113 Wellington Water	S113.006	Support in part	DairyNZ agrees there are limited pathways for Regionally Significant Infrastructure. DairyNZ's position is that Council should	Allow in part • <i>Deleting this component of the RPS change</i>

			<p>delete provisions related to biodiversity until the National Policy Statement on Indigenous Biodiversity has been gazetted, rather than updating the RPS once the NPS is gazetted as sought by the submitter.</p> <p>Deletion and redrafting once the NPS has been gazetted provides for full consideration of how the NPS may be best implemented, as well as allow for consideration around important related aspects, such as the proposed definition of Regionally Significant Infrastructure.</p>	
S140 Wellington City Council (WCC)	S140.019	Oppose in part	DairyNZ agrees that the provisions related to biodiversity should be consistent with the National Policy Statement on Indigenous Biodiversity. However, given the potential for changes to the exposure draft of the NPS Biodiversity we consider it more prudent to delete the relevant provisions and revisit once the NPS is gazetted.	<p>Allow in part</p> <ul style="list-style-type: none"> • <i>Deleting this component of the RPS change</i> • <i>Reviewing the RPS once the NPS-IB has been gazetted</i>
S167 Taranaki Whānui	S167.035	Oppose	DairyNZ does not support the suggested wording as the PRPS already appropriately identifies the adverse impacts of agriculture more broadly in the introductions to Chapters 3.4 and 3.6, as well as being captured through identification of human use and development. Introducing specific activities like farming on top of existing wording risks focusing on only part of the problem where the issue is much larger.	Disallow
S147 Wellington Fish and Game Council	S147.018	Oppose	The submitters proposed amendments reduce the clarity of the text, do not appropriately reflect the importance of indigenous biodiversity as a priority, and do not reflect the importance of ecosystem processes.	Disallow
S34 Te Kaunihera o Te Awa Kairangi ki	S34.072	Support in part	DairyNZ agrees with the submitter's concerns. However, we consider the focus should be on	<p>Allow</p> <p>Either</p>

			significant indigenous habitats and significant habitats of indigenous fauna, as per our original submission.	<ul style="list-style-type: none"> - Focus the objective on significant indigenous habitats and significant habitats of indigenous fauna, as per our original submission <p>Or</p> <ul style="list-style-type: none"> - Adopt the submitters wording as proposed (or words to similar effect)
S134 Powerco Limited	S134.003	Support in part	DairyNZ agrees with the submitter's concerns. However, we consider the focus should be on significant indigenous habitats and significant habitats of indigenous fauna, as per our original submission.	<p>Allow Either</p> <ul style="list-style-type: none"> - Focus the objective on significant indigenous habitats and significant habitats of indigenous fauna, as per our original submission <p>Or</p> <ul style="list-style-type: none"> - Adopt the submitters wording as proposed (or words to similar effect)
S147 Wellington Fish and Game Council	S147.019	Oppose	The submitters proposed amendments reduce the clarity of the objective and do not appropriately reflect the importance of indigenous biodiversity as a priority, nor the critical interaction between introduced species which predate on indigenous species.	Disallow
S140 Wellington City Council (WCC)	S140.019	Oppose in part	While DairyNZ agrees with the submitter's concerns in respect of potential inconsistencies between this Objective and the NPS-IB, we consider the relief sought in our original submission (deletion of the Objective until a full review of the RPS is undertaken) or amendments to wording as sought in our original submission.	Disallow

FURTHER SUBMISSION ON PROPOSED CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION

To: Greater Wellington Regional Council
PO Box 11646
Wellington 6142

regionalplan@gw.govt.nz

Name of Submitter: Stride Investment Management Limited

Address: c/- MinterEllisonRuddWatts
PO Box 105249
AUCKLAND 1143
Attention: Bianca Tree / Amy Dresser

bianca.tree@minterellison.co.nz

Further Submission on Proposed Change 1

1. Stride Investment Management Limited (**Stride**) appreciates the opportunity to make this further submission on Proposed Change 1 (**PC 1**) to the Regional Policy Statement for the Wellington Region (**RPS**).
2. Stride has an interest in PC 1 that is greater than the interest of the general public, as Stride manages Johnsonville Shopping Centre. Stride also made a primary submission on PC 1. An overview of the Johnsonville Shopping Centre and Stride's interests in PC 1 are set out in Stride's primary submission.
3. This is a further submission on behalf of Stride to support in part the primary submissions of Wellington City Council (**WCC**) and Kāinga Ora – Homes and Communities (**Kāinga Ora**) on PC 1.

Further Submission

4. Stride supports Wellington City Council's (**WCC**) submission to the extent that it seeks for Johnsonville to be recognised as a sub-regional centre and as one of the 'other regionally significant centres' in the Wellington region.
5. Stride also supports Kāinga Ora's submission on PC 1 to the extent that it seeks Johnsonville Shopping Centre to be recognised as a metropolitan centre, as that terminology is consistent with the National Planning Standards,

Proposed Wellington City District Plan, and Johnsonville's role as a sub-regional centre. Stride also supports other parts of Kāinga Ora's submission which seek to enable development in Wellington and give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**).

6. The details and specific reasons for Stride's further submission in support of WCC's and Kāinga Ora's submissions on PC 1 is set out in **Appendix A**.

Reasons for Submission

7. In addition to the specific reasons identified in Appendix A, the reasons for Stride's further submission are to ensure that PC 1:
 - (a) will give effect to the objectives and policies of the NPS-UD;
 - (b) will comply with the National Planning Standards;
 - (c) will contribute to well-functioning urban environments;
 - (d) is consistent with the sustainable management of physical resources and the purpose and principles of the Resource Management Act 1991 (**RMA**);
 - (e) will meet the requirements to satisfy the criteria of section 32 of the RMA;
 - (f) will meet the reasonably foreseeable needs of future generations; and
 - (g) is consistent with sound resource management practice.

Relief Sought

8. Stride seeks the relief sought in Appendix A, and such other additional or consequential relief to give effect to the matters raised in this submission.
9. Stride wishes to be heard in support of its submission.

10. If others make a similar submission, Stride will consider presenting a joint case with them at a hearing.

DATED this 19th day of December 2022

Stride Investment Management Limited by
its solicitors and duly authorised agents
MinterEllisonRuddWatts



Bianca Tree / Amy Dresser

Address for service of submitter

Stride Investment Management Limited c/- MinterEllisonRuddWatts

PO Box 105249

AUCKLAND 1143

Attention: Bianca Tree / Amy Dresser

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Appendix A – Further submission of Stride Investment Management Limited (**Stride**) on Proposed Change 1 (**PC 1**) to the Wellington Regional Policy Statement (**RPS**)

Submitter	Sub no./ point no.	Support/ oppose	Provision	Reasons for support / opposition	Decision sought
Wellington City Council	S140.052	Support	Policy 30	Stride agrees that Johnsonville should be identified as a regionally significant centre, which would align with the approach taken in the Proposed Wellington City District Plan. This would recognise that Johnsonville Shopping Centre is a hub of retail activity which supports the economic and social wellbeing of the Wellington community.	Allow
Kāinga Ora – Homes and Communities	S158.010	Support	Objective 20	Stride supports taking a practical approach to climate change risk assessment, including recognising that natural hazard and climate change mitigation and adaptation activities should not increase risks from natural hazards.	Allow
	S158.013	Support	Policy CC.2	It is inappropriate and unnecessary for the RPS to require district plans to require consent applicants to provide travel demand management plans; territorial authorities have the capability to request travel demand management plans when required.	Allow
	S158.21	Support	Policy FW.4	It is inappropriate and unnecessary for the RPS to require district plans to require financial contributions to be paid for stormwater mitigation. The territorial authority should retain discretion to undertake an assessment.	Allow
	S158.026	Support	Policy 30	Johnsonville should also be identified as a metropolitan centre which is consistent with the National Planning Standards, Proposed Wellington City Plan and its sub-regional status. Stride also supports other submission points which seek consequential amendments to the RPS to reflect Johnsonville being recognised as a Metropolitan Centre.	Allow

Submitter	Sub no./ point no.	Support/ oppose	Provision	Reasons for support / opposition	Decision sought
	S158.027	Support	Policy 31	Stride considers PC 1 does not adequately give effect to the requirements of the NPS-UD and supports providing better direction for where intensification can occur, for example, by amending Policy 31.	Allow

FORM 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSION ON NOTIFIED PROPOSED POLICY STATEMENT
OR PLAN, CHANGE OR VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To Greater Wellington Regional Council
Environmental Policy
PO Box 11646
Wellington 6142

Name: Wellington International Airport Limited (“WIAL”)

- 1. These are further submissions in opposition to or support of submissions on the Proposed Change 1 to the Regional Policy Statement for the Wellington Region (“the RPS”).**

- 2. WIAL has an interest in the RPS that is greater than the interest the general public has within the Region.**
 - 2.1 WIAL made a number of original submissions on the RPS.
 - 2.2 As set out in WIAL’s original submissions on the RPS:
 - 2.2.1 Wellington Airport is managed by WIAL. WIAL is a network utility operator and a requiring authority under section 166 of the Resource Management Act 1991 (“**the RMA**” or “**the Act**”).
 - 2.2.2 WIAL owns and operates the regionally and nationally significant Wellington Airport.
 - 2.2.3 The Airport plays a fundamental role in the social and economic wellbeing of the city, region and the country.
 - 2.2.4 The Airport provides an important national and international transport link for the local, regional and international community and has a major influence on the regional and national economy.

2.2.5 The Airport is also a provider of emergency services and is a lifeline utility under the Civil Defence Emergency Management Act 2002 (“**CDEM 2002**”).

2.3 Given WIAL’s role in managing the Airport and as a submitter on the RPS, WIAL has an interest greater than the general public and is concerned to ensure the RPS appropriately recognises and provides for the Airport to operate in a safe, efficient and effective manner, whilst ensuring that reverse sensitivity effects are avoided.

3. WIAL therefore makes the following further submissions pursuant to clause 8 of the First Schedule to the RMA. Further submissions from WIAL on the RPS, including the particular parts of the submission that WIAL supports or opposes, and WIAL’s reasons for that support or opposition, are attached to this document in Appendix A.

4. WIAL will not gain an advantage in trade competition through these further submissions.

5. General reasons for WIAL’s further submissions:

5.1 In its original submission, WIAL emphasized the importance of ensuring that the RPS adequately addresses the following matters (refer to the primary submission for the full suite of considerations):

5.1.1 That regionally significant infrastructure, such as Wellington International Airport, is appropriately recognised and provided for in the RPS.

5.1.2 WIAL recognises that the effects of climate change and global sustainability are of increasing importance to the community, WIAL’s customers and the aviation industry. WIAL is committed to playing its part in helping New Zealand to achieve the national target of net zero emissions by 2050.

5.1.3 WIAL, together with its airline and aviation sector partners, work closely with government agencies to ensure that all policy requirements are met and is closely engaged in the development of climate-related policy. The changes to the RPS need to appropriately recognise that there are many regulatory layers, and that the RMA is not the only or primary legislative vehicle in which climate change is being addressed in New Zealand. This is currently the Climate Change Response Act 2002 (“**CCRA**”) which sets out the legal framework to drive domestic emissions reductions to enable New Zealand to meet its international climate change commitments.

- 5.1.4 The RPS also needs to suitably recognise that the emission trading scheme (“**ETS**”) is the cornerstone of New Zealand’s climate change regulation. The ETS covers all sectors of the economy, including domestic aviation emissions. The RPS should ensure it is not out of step with existing or higher order legislation in this regard.
- 5.1.5 The RPS needs to appropriately provide for climate change adaptation, particularly given the airport has a functional and operational need to be located by the coast. WIAL submits that the RPS needs to include sufficient flexibility in the proposed climate change provisions so that the Airport can appropriately adapt to the challenges and opportunities that the changing climate will present.
- 5.1.6 The only thing that is certain about the future of aviation in a low carbon economy is that airports, including Wellington Airport, will need the flexibility to accommodate changes in technology as there is a move toward meeting our nation’s net carbon zero 2050 commitment. Local Government’s efforts are best placed in facilitating the local development of supporting infrastructure, such as SAF plants, electrical grid improvements and commercial hydrogen production capabilities, to help make these changes a reality.
- 5.1.7 That a number of the freshwater related provisions also refer to the coastal marine area / coastal environment which may result in the management of the coastal resources which is inconsistent with the New Zealand Coastal Policy Statement.
- 5.1.8 That the RPS provides clear provisions which properly recognise the significant benefits of existing regionally significant infrastructure, and which enable its protection and adaptation. This includes the provisions relating to biodiversity offsetting and compensation for certain species.
- 5.1.9 That there is suitable recognition within the natural hazard provisions of the RPS that infrastructure often has a functional or operational requirement to locate in a certain area, even if that area is subject to natural hazard risk. For such infrastructure providers the RPS needs to suitably recognise that natural hazard tolerance is therefore inherently different to those without the same operational or functional need to be located in such areas
- 5.1.10 That the provisions need to appropriately recognise that in some situations housing developments can be constrained by the “qualifying matters” that are also set out in the National Policy Statement on Urban Development. This specifically includes areas of land which are subject to designations and the ability to safely and efficiently operate regionally significant infrastructure.

5.1.11 The Freshwater Planning Process (“**FPP**”) has been applied to a number of provisions more broadly relating to climate change, urban environments and all biodiversity and natural hazards. It is unclear how these should be progressed through the FPP, as 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 focused on outcomes that are much broader.

6. **WIAL seeks that the submissions be allowed or disallowed as set out in Appendix A.**

7. **WIAL does wish to be heard in support of these further submissions. If others make a similar submission, WIAL will consider presenting a joint case with them at a hearing.**

Signature: 

Date: 19 December 2022

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Dunedin 9054

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Appendix A: Wellington International Airport Ltd's Further Submission on the Regional Policy Statement for the Wellington Region – Plan Change 1

Submitter	Submitter No.	Provision	Relief Sought by Submitter	WIAL Position	The reasons for my support / opposition	WIAL seeks that the whole (or part) of the submission be Allow / Disallow
Chapter 3.1A: Climate Change						
Meridian Energy Limited	S100.004	Objective CC.1	Insert explicit reference to 'regionally significant infrastructure' into clause (c) of objective CC.1.	Support	WIAL supports the relief sought, insofar as it is consistent with WIAL's primary submission, as it appropriately provides for the Airport as regionally significant infrastructure, owned and operated by WIAL.	Allow
Waka Kotahi NZ Transport Agency	S129.002; S129.003	Objective CC.1	Seeks further clarification of how low emission and climate mitigation and adaptation is defined and seeks further clarification on how (c) will be implemented.	Support	WIAL supports the relief sought as it considers further clarification is required on how CC.1 will be measured and implemented by the GWRC so that the outcomes sought can be achieved.	Allow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.003	Objective CC.1	Seek amendment: By 2050, the Wellington Region is a low <u>zero</u> emission and climate resilient region, where climate change mitigation and adaptation are an integral part of: (a) sustainable air, land, freshwater, and coastal management, (b) well-functioning urban environments and rural areas, and (c) well-planned infrastructure.	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission. In particular, it is noted that for certain industries, such as aviation and shipping, emissions from these activities are not currently included in the net-zero target but are separately accounted for as part of New Zealand's broader commitments.	Disallow
Hutt City Council	S115.027	Policy CC.1	Substitute new Policy CC.1 completely with: <u>Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure - district and regional plans</u> <u>District and regional plans shall include objectives, policies, and methods that only enable new transport infrastructure or significant alterations to transport infrastructure where it:</u> (a) <u>does not provide added transport network capacity for high-carbon passenger transport modes; and</u> (b) <u>to the extent possible for a project of its scale, maximises local and regional mode shift from high-carbon passenger transport modes to low and zero-carbon modes; and</u> (c) <u>is designed and constructed to minimise greenhouse gas emissions; and</u> (d) <u>can be and is intended to be operated to minimise greenhouse gas emissions</u>	Oppose in part	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission. Aircraft emission technology is still evolving, and it would therefore be inappropriate if this policy were extended to air transportation.	Disallow or for example amend to ensure the policy relates to land transportation infrastructure only.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.038	Policy CC.5	Amend as follows: Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that <u>contribute to greenhouse gas</u>	Oppose	WIAL oppose the relief sought as it does not appropriately provide for the Airport as regionally significant infrastructure. Aircraft emission technology is still evolving, and it would therefore be	Disallow

Appendix A: Wellington International Airport Ltd's Further Submission on the Regional Policy Statement for the Wellington Region – Plan Change 1

Submitter	Submitter No.	Provision	Relief Sought by Submitter	WIAL Position	The reasons for my support / opposition	WIAL seeks that the whole (or part) of the submission be Allow / Disallow
			<u>emissions or</u> result in an increase in gross greenhouse gas emissions from agriculture.		inappropriate if this policy were extended to air transportation.	
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.041	Policy CC.8	Amend as follows: District and regional plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply. Include additional policy direction to require that, where there is no possible alternative to reducing greenhouse gas emissions, offsets must be achieved by the planting of indigenous vegetation over plantation forestry	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission and does not appropriately provide for the Airport as regionally significant infrastructure.	Disallow
Greater Wellington Regional Council	S137.009	Policy CC.9	Amend Policy CC.9 as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and <u>or</u> development have has been planned in a way that contributes to reducing greenhouse gas emissions by to optimise <u>optimising</u> overall transport demand, maximising mode shift from private vehicles to public transport or active modes, <u>and supporting the move towards low and zero-carbon modes in a way that contributes to reducing greenhouse gas emissions.</u>	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission.	Disallow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.063	Policy CC.9	Amend as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether <u>ensure</u> 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 <u>achieves the greenhouse gas emission targets in Objective CC.3.</u> contributes to reducing greenhouse gas emissions	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission.	Disallow
Royal Forest and Bird Protection Society of New Zealand Inc.	165.066	Policy CC.12	Amend as 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 to climate change and particular regard shall be given to avoiding any adverse effects on the climate change mitigation or adaptation functions <u>must be avoided.</u>	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission and it may unduly constrain development associated with the Airport as regionally significant infrastructure, owned and operated by WIAL.	Disallow

Appendix A: Wellington International Airport Ltd's Further Submission on the Regional Policy Statement for the Wellington Region – Plan Change 1

Submitter	Submitter No.	Provision	Relief Sought by Submitter	WIAL Position	The reasons for my support / opposition	WIAL seeks that the whole (or part) of the submission be Allow / Disallow
Rangitāne O Wairarapa Inc	S168.0125	Policy CC.12	Amend policy to provide stronger protection for nature-based solutions, given the importance of such solutions in the region's climate change response.	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission and it may unduly constrain development associated with the Airport as regionally significant infrastructure, owned and operated by WIAL.	Disallow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.042	Policy 3	Amend this policy, or include a new policy, to ensure that all areas of natural character in the coastal environment are adequately protected in accordance with Policy 13 NZCPS.	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission.	Disallow
Genesis Energy Limited	S99.001	Policy 7	<p>Amend Policy 7 as shown below.</p> <p>Policy 7: Recognising <u>Promote, enable and protects</u> the benefits from renewable energy and regionally significant infrastructure - regional and district plans.</p> <p>District and regional plans shall include policies and/or methods that recognise:</p> <p>(a) <u>Promotes and enables</u> the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including:</p> <p>(i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to low or zero carbon multi modal travel modes;</p> <p>(ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</p> <p>(iii) people have access to <u>secure and affordable</u> energy, <u>maximising</u> and preferably low or zero carbon energy sources, so as to meet their needs; and</p> <p>(iv) people have access to telecommunication services.</p> <p>(b) <u>Promotes and enables</u> the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</p> <p>(i) security of supply and diversification of our energy sources;</p> <p>(ii) reducing dependency on imported energy resources; and</p> <p>(iii) reducing greenhouse gas emissions.</p> <p>(c) <u>Protects the social, economic, cultural and environmental benefits of renewable energy and regionally significant infrastructure from reverse sensitivity effects.</u></p>	Support	WIAL supports the relief sought as it appropriately recognises and provides for regionally significant infrastructure.	Allow

Appendix A: Wellington International Airport Ltd's Further Submission on the Regional Policy Statement for the Wellington Region – Plan Change 1

Submitter	Submitter No.	Provision	Relief Sought by Submitter	WIAL Position	The reasons for my support / opposition	WIAL seeks that the whole (or part) of the submission be Allow / Disallow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.043	Policy 7	Replace "low and zero carbon regionally significant infrastructure" with "regionally significant infrastructure that contributes to the achievement of the greenhouse gas emission targets in Objective CC.1" Make consequential amendments to explanation.	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission and does not appropriately provide for all types of regionally significant infrastructure.	Disallow
Hutt City Council	S115.064	Policy 39	Amend Policy 39 to clarify that the policy does not require renewable energy projects and regionally significant infrastructure projects to conduct a greenhouse gas assessment at resource consent stage, unless the applicant is relying on the beneficial environmental effects of greenhouse gas emissions reductions to justify the project.	Support	WIAL supports the relief sought as it appropriately provides for regionally significant infrastructure. The aviation sector has other ways to manage emissions that sit outside of the resource consent process and this approach sought is generally consistent with that.	Allow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.068	Policy 39	Amend Policy 39(a) as follows: the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions <u>in a way that achieves the targets in Objective CC.3;</u> and	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission and does not appropriately provide for regionally significant infrastructure.	Disallow
Chapter 3.4 Freshwater						
BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.029	Policy 14	(h) Require that urban development is located and designed to <u>reduce the potential for adverse effects on</u> protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;	Support	WIAL support the relief sought as it is consistent with Part 2 and provisions of the Act, the New Zealand Coastal Policy Statement and other relevant statutory documents.	Allow
Director-General of Conservation	S32.025	Policy 42	Retain as notified, except for the following changes or words to like effect: (j) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries <u>and the coastal marine area;</u>	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission. WIAL is concerned the submission seeks to apply the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area and considers reference to the coastal marine area in this policy should be deleted.	Disallow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.055	Policy FW.3	Amend (g) and (h) as follows: (g) Consider the avoid the adverse effects on freshwater and the coastal marine area of subdivision, use and development of land; (h) Consider <u>control</u> the use and development of land in relation <u>order</u> to <u>achieve</u> target attribute states and <u>comply with</u> any limits set in a regional plan; Amend clause (p) as follows: (p) Consider <u>promote</u> daylighting of streams, where practicable; and	Oppose	WIAL oppose the relief sought as it is inconsistent with Part 2 and provisions of the Act, the New Zealand Coastal Policy Statement and other relevant statutory documents.	Disallow

Appendix A: Wellington International Airport Ltd's Further Submission on the Regional Policy Statement for the Wellington Region – Plan Change 1

Submitter	Submitter No.	Provision	Relief Sought by Submitter	WIAL Position	The reasons for my support / opposition	WIAL seeks that the whole (or part) of the submission be Allow / Disallow
Chapter 3.6 Indigenous Ecosystems						
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.021	Objective 16	As written this objective does not give effect to s6(c) of the RMA and needs to include protection of significant habitats of indigenous fauna which could be exotic.	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission.	Disallow
Transpower New Zealand Limited	S10.002	Policy 24	Amend Policy 24 to recognise that regionally significant infrastructure may have a functional or operational need to locate in a particular location. This could be achieved by adding a qualifying statement: <u>This does not apply to nationally and regionally significant infrastructure that has a functional or operational need to locate in a particular location. In the case of the National Grid, following a route, site and method selection process and having regard to the technical and operational constraints of the network, new development or major upgrades of the National Grid shall seek to avoid adverse effects, and otherwise remedy or mitigate adverse effects, on ecosystems or habitats with significant indigenous biodiversity values.</u>	Support in part	WIAL support the relief sought, subject to the relief sought in WIAL's primary submission, as it recognises the functional and operational need for regionally significant infrastructure to locate in a particular location.	Allow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.074	Policy 47	Include (j) as a matter that has to be "given effect to", not "have regard to." Also include a requirement to give effect to a full set of mandatory offsetting and compensation principles, that are included in the RPS.	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission.	Disallow
Chapter 3.8 Natural Hazards						
Kāpiti Coast District Council	S16.070	Objective 20	Amend Objective 20 so it reads as follows: Natural hazard and climate change mitigation and adaptation activities <u>avoid minimise</u> the risks from <u>significant</u> natural hazards and mitigate the risks from all other natural hazards and impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity.	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission.	Disallow
BP Oil NZ Ltd, Mobil Oil Ltd, and Z Energy Ltd	S157.007	Objective 20	Amend Objective 20 as follows: Objective 20: <u>Natural hazard and climate change mitigation and adaptation activities minimise the risks from natural hazards-Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events and seek to minimise</u> impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity.	Support	WIAL support the relief sought as it will achieve the management of natural and physical resources in a manner that is sustainable, efficient and effective for the Wellington community, including Wellington International Airport.	Allow
Kāinga Ora Homes and Communities	S158.011	Objective 21	Amend the objective to provide measurable clarity. The resilience of our communities and the natural environment is <u>strengthened to avoid loss of life and damage to property due to the to the short, medium, and long-term</u>	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission.	Disallow

Appendix A: Wellington International Airport Ltd's Further Submission on the Regional Policy Statement for the Wellington Region – Plan Change 1

Submitter	Submitter No.	Provision	Relief Sought by Submitter	WIAL Position	The reasons for my support / opposition	WIAL seeks that the whole (or part) of the submission be Allow / Disallow
			effects of climate change, and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.			
Director-General of Conservation	S32.020	Policy 29	Amend the policy to give effect to the NZCPS, including by adding a new subclause as follows or words to like effect: "include objectives, policies and rules to avoid subdivision, use or development within the coastal environment that would increase the risk of adverse effects from coastal hazards"	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission and does not appropriately provide for regionally significant infrastructure.	Disallow
Toka Tu Ake EQC	S132.007	Policy 29	Strengthen, change to: " <u>Avoid subdivision, use and development in areas at high risk from natural hazards and manage in areas of lower risk</u> " Add guidance on what constitutes low, medium, and high natural hazard risk, to avoid inconsistent application of these terms in district plans	Oppose	WIAL oppose the relief sought as it does not appropriately provide for regionally significant infrastructure. Disallow the proposed amendment or for example clarify that it does not apply to regionally significant infrastructure.	Disallow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.058	Policy 29	Retain "Avoid inappropriate" in the original policy to give effect to the NZCPS. Seek retention of original wording as the term 'manage' is not appropriate and fails to achieve NZCPS Objective 19.	Oppose	WIAL oppose the relief sought as it does not appropriately provide for regionally significant infrastructure. Disallow the proposed amendment or for example clarify that it does not apply to regionally significant infrastructure.	Disallow
Director-General of Conservation	S32.028	Policy 51	Retain as notified, except to retain the operative version of subclause (b): " <u>the potential for climate change and sea level rise to increase in the frequency or magnitude of a hazard event</u> "	Support	WIAL support the relief sought as it is considered the impacts of climate change and sea level rise on natural hazard events are relevant matters to consider in order to minimise the risks and consequences associated with natural hazards.	Allow
Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand Trading Limited	S49.005	Policy 51	Remove the ability for regional and district plans to regulate the resilience of infrastructure to identified natural hazards.	Support	WIAL support the relief sought, as it appropriately provides for regionally significant infrastructure.	Allow
Wellington Water	S113.043	Policy 51	Insert new clause: (k) <u>recognising that it may not always be practicable for regionally significant infrastructure to avoid high to extreme hazard areas and providing appropriate management regimes.</u>	Support	WIAL support the relief sought, as it appropriately provides for the Airport as regionally significant infrastructure.	Allow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.075	Policy 51	Amend the heading and chapeau to Policy 51 as follows: Policy 51: Minimising <u>Avoiding</u> the risks and consequences of natural hazards - consideration "When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be	Oppose	WIAL oppose the relief sought as it does not appropriately provide for regionally significant infrastructure, such as the Airport, which has a functional and operational need to be located by the coast.	Disallow

Appendix A: Wellington International Airport Ltd's Further Submission on the Regional Policy Statement for the Wellington Region – Plan Change 1

Submitter	Submitter No.	Provision	Relief Sought by Submitter	WIAL Position	The reasons for my support / opposition	WIAL seeks that the whole (or part) of the submission be Allow / Disallow
			minimised <u>avoided</u> , and/or in determining whether an activity is inappropriate particular regard shall be given to:"			
Director-General of Conservation	S32.029	Policy 52	Add a new subclause as follows or words to like effect: " <u>avoiding hazard mitigation measures within the coastal environment that would increase the risk of social, environmental and economic harm or other adverse effects from coastal hazards</u> "	Oppose	WIAL oppose the relief sought as it does not appropriately provide for the Airport as regionally significant infrastructure.	Disallow
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.076	Policy 52	Policy 52: Minimising <u>Avoiding</u> adverse effects of hazard mitigation measures – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given to: (a) the need for structural protection works or hard engineering methods; (b) whether <u>prioritising</u> non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options or nature-based solutions provide as <u>as</u> a more appropriate or suitably innovative solution; ... (e) <u>avoiding</u> adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity; ... so that they minimise <u>avoid</u> the risks from of natural hazards.	Oppose	WIAL oppose the relief sought as it is inconsistent with WIAL's primary submission.	Disallow
Chapter 3.9: Regional Form, Design and Function						
Porirua City Council	S30.022	Objective 22	Amend the objective so that it is clear what the outcome sought is, and/or reword as follows: <u>The Wellington regional form:</u> A. <u>Is compact, well designed and has good accessibility between housing, employment opportunities, community services, natural spaces, and open spaces, including:</u> 1. <u>A network and hierarchy of commercial centres which support the primacy of the Wellington city centre followed by:</u> i. <u>Metropolitan Centres,</u> ii. <u>Town Centres,</u> iii. <u>Local Centres; and</u> iv. <u>Neighbourhood Centres;</u>	Oppose in part	WIAL oppose the relief sort as it is inconsistent with WIAL's primary submission. WIAL seeks that the amendments be disallowed or for example amended to exclude regionally significant infrastructure.	Disallow

Appendix A: Wellington International Airport Ltd's Further Submission on the Regional Policy Statement for the Wellington Region – Plan Change 1

Submitter	Submitter No.	Provision	Relief Sought by Submitter	WIAL Position	The reasons for my support / opposition	WIAL seeks that the whole (or part) of the submission be Allow / Disallow
			<p>2. <u>A Regional urban form that is integrated with existing and planned transport network;</u></p> <p>3. <u>Commercial and industrial activities distributed in appropriate locations and in a way that supports the commercial centres hierarchy identified in A.1 above;</u></p> <p>4. <u>More people living in, and more business and community services located in, areas that are in or near a commercial centre and/or well-served by public transport;</u></p> <p>5. <u>Urban built environments that meet the health and wellbeing needs of people.</u></p> <p>B. <u>Supports the competitive operation of land and development markets in ways that contribute to improved housing affordability and business activity, including:</u></p> <p>1. <u>A variety of homes that meet the needs, in terms of type and location, of different households.</u></p> <p>2. <u>Sufficient housing and business development capacity in the short and medium term as identified in Table 9A to RPS Objective 22A.</u></p> <p>3. <u>A range of buildings and sites in appropriate locations that provide opportunities for commercial and industrial activities in a way that achieves the commercial centres hierarchy identified in A.1 above and maintains the primacy of the Wellington city centre.</u></p> <p>C. <u>Optimises the efficient use of existing infrastructure.</u></p>			
Kāinga Ora Homes and Communities	S158.049	Regional form, design and function Anticipated environmental results	<p>Amend anticipated environmental results as follows:</p> <p>1. District plans:</p> <p>(a) contain policies, rules and/or other methods that encourage a range of land use activities to maintain and enhance the viability and vibrancy of Wellington City Centre, the Metropolitan Centres and the Town Centres the regionally and locally significant centres, including the regional central business district; and</p> <p>(b) identify and contain policies and methods to enable a range of building heights and density, including high and medium density development.</p> <p>(c) identify and enable urban intensification, including building heights and built form density:</p> <p>i. <u>As much capacity development capacity as possible to maximise the benefits of intensification within the Wellington City Centre and within at</u></p>	Oppose in part	WIAL opposes the relief sought to the extent that it is not clear where the “town centres” are located and the extent to which these may / may not be located within WIAL’s Obstacle Limitation Surface designation or the Air Noise Boundary of 60dB Ldn Noise Boundary for Wellington International Airport.	Disallow

Appendix A: Wellington International Airport Ltd's Further Submission on the Regional Policy Statement for the Wellington Region – Plan Change 1

Submitter	Submitter No.	Provision	Relief Sought by Submitter	WIAL Position	The reasons for my support / opposition	WIAL seeks that the whole (or part) of the submission be Allow / Disallow
			<p><u>least a 15-20 minute / 1200m-1500m walkable catchment from the edge of the City Centre Zone;</u></p> <p><u>ii. Building heights of at least 6 storeys and density of urban form to reflect demand for housing and business use within the Metropolitan Zones and at least 15min/800m walkable catchment from the edge of the Metropolitan Centre Zone and from existing and planned rapid transit stops;</u></p> <p><u>iii. Within and adjacent to the town centres, building heights of at least 6 storeys and densities of urban form commensurate with the level of commercial activity and community services and at least within a 10 min/400-800m walkable catchment from the edge of the Town Centre Zones.</u></p>			
Definitions						
Kāinga Ora Homes and Communities	S158.041	Definitions – Regionally Significant Infrastructure	Seeks to delete definition in its entirety.	Oppose	WIAL note that this definition appears to have been incorrectly included and Kāinga Ora's primary submission seeks to delete the definition of regionally significant centres. However, if WIAL have misinterpreted the submission, WIAL opposes the relief sought as it does not appropriately provide for regionally significant infrastructure.	Disallow

Form 6

Further submission on notified proposed plan change

Clause 8 of Schedule 1, Resource Management Act 1991

To: Greater Wellington Regional Council

Name of persons making further submission: R P Mansell; A J Mansell, & M R Mansell

This is a further submission opposing a submission on the following plan change proposed to the Operative Regional Policy Statement for the Wellington Region (the **proposal**):

- Proposed Plan Change 1 (PPC1)

We are persons who have an interest in the proposal that is greater than the interest the general public has, as we own land that we consider should be the subject of the provisions of PPC1.

We oppose the following submission, as identified in the attached table:

- S16 - Kāpiti Coast District Council

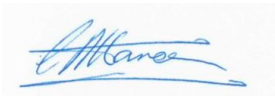
The particular parts of the submissions we oppose are identified in the attached table.

The reasons for our opposition are identified in the attached table.

We seek that the part of the submission we oppose be disallowed as identified in the attached table.

We wish to be heard in support of our further submission.

If others make a similar further submission, we will consider presenting a joint case with them at a hearing.



Signature of person making further submission
(or person authorised to sign
on behalf of person making further
submission)

Date: 19 December 2022

Electronic address for service of person making further submission:

Telephone: 02102645108

Email address: chris@rmaexpert.co.nz

Contact person: Chris Hansen; Planning Consultant

Submitter ID/Point No./ Name	Submission / Plan Provision	Support / Oppose	Relief Sought	Reason
S16.075 - Kāpiti Coast District Council	<p>General comment – urban development.</p> <p>The submitter notes there is no statutory requirement for the RPS to direct how city and district councils are to give effect to all other RPS provisions. The submitter opposes much of the content of the RPS Change 1 content in the regional form, design and function chapter directing how city and district councils are to meet their responsibilities under the NPS-UD.</p> <p>The submitter seeks all non-mandatory provisions that are intended to direct city and district councils on how to give effect to the NPS-UD to be deleted.</p>	Oppose	R P Mansell; A J Mansell, & M R Mansell seek for the relief sought by the submitter to delete all non-mandatory provisions that are intended to direct city and district councils on how to give effect to the NPS-UD be disallowed, and seek the intent and provisions in Proposed Plan Change 1 to implement the NPS-UD be retained.	<p>R P Mansell; A J Mansell, & M R Mansell supported the intent and provisions included in the RPS through Proposed Plan Change 1 to implement the NPS-UD in its submission, and consider the RPS provisions correctly provide direction for further urban development to implement the outcomes sought by the NPS-UD, and meet the sustainable management purpose of the RMA.</p> <p>R P Mansell; A J Mansell, & M R Mansell do not agree with the submitter that the RPS cannot provide direction to city and district councils on how the NPS-UD should be implemented, from a regional perspective.</p>
S16.094 - Kāpiti Coast District Council	<p>Introduction 3.9: Regional form, design and function</p> <p>The submitter opposes all references to the Wellington Regional Growth Framework (WRGF) within the RPS, and in particular the suggestion it forms the interim strategic growth direction for the region</p>	Oppose	R P Mansell; A J Mansell, & M R Mansell seek for the relief sought by the submitter to delete all references to, and information from, the WRGF throughout the Proposed RPS Change 1, and the replacement reference to a Future Development Strategy, be disallowed, and seek the provisions in	R P Mansell; A J Mansell, & M R Mansell supported the intent of the amendments to the introduction to Chapter 3.9 and sought they be retained as currently written in its submission, and consider the RPS reference to the WRGF is appropriate and necessary to implement the outcomes sought by the NPS-UD, and to meet the sustainable management purpose of the RMA.

	<p>prior to the development of a Future Development Strategy (FDS) under the NPS-UD.</p> <p>The submitter considers the development of the WRGF was not significantly robust and did not follow the special consultative procedure required for a plan or strategy under the Local Government Act, and it therefore lacks any statutory weight under the RMA as a document prepared under other legislation.</p> <p>The submitter seeks the deletion of all references to, and information from the WRGF throughout proposed RPS Change 1; and to replace all references to the WRGF with placeholder references to a Future Development Strategy that has been prepared and published in accordance with the requirements of Subpart 4 of the NPS-UD.</p>		Proposed Plan Change 1 to implement the NPS-UD be retained.	R P Mansell; A J Mansell, & M R Mansell do not agree with the submitter that the WRGF was not significantly robust and lacks any statutory weight under the RMA.
S16.077 - Kāpiti Coast District Council	<p>Objective 22</p> <p>While the submitter supports in part the new Objective 22, they consider the objective proposes to introduce policy-level direction on what well-functioning urban environments are. The submitter considers</p>	Oppose	R P Mansell; A J Mansell, & M R Mansell seek for the relief sought by the submitter to delete clauses (a) – (k) of the new Objective 22 to be disallowed, and seek the current wording of Objective 22 to be retained.	R P Mansell; A J Mansell, & M R Mansell supported the intent of the new Objective 22 and sought for its current wording to be retained as defining well-functioning urban environments is appropriate and necessary to implement the outcomes sought by the NPS-UD, and meet the sustainable management purpose of the RMA.

	<p>this level of detail should be deleted from the objective, with the objective retaining a high-level goal.</p> <p>The submitter seeks for Objective 22 to be amended by deleting proposed clauses (a) - (k).</p>			<p>R P Mansell; A J Mansell, & M R Mansell do not agree with the submitter that the detail contained in clauses (a) – (k) of the new Objective 22 should be deleted.</p>
S16.040 - Kāpiti Coast District Council	<p>Policy 55</p> <p>While the submitter supports the intent of the policy, it raises a number of concerns specific to how the policy is drafted.</p> <p>Based on the concerns raised, the submitter seeks a range of amendments including additional wording and the deletion of parts of the policy as notified, and the deletion of the Explanation</p>	Oppose	<p>R P Mansell; A J Mansell, & M R Mansell seek for the relief sought by the submitter to amend Policy 55 by adding to and deleting parts of the policy, and the Explanation, be disallowed, and seek the current intent of Policy 55 to be retained, with the minor amendment sought to the Explanation as per their submission.</p>	<p>R P Mansell; A J Mansell, & M R Mansell supported the intent of the Policy 55 and sought for its current wording to be retained (with a minor amendment sought to the Explanation) as providing for appropriate urban expansion is appropriate and necessary to implement the outcomes sought by the NPS-UD, and meet the sustainable management purpose of the RMA.</p> <p>R P Mansell; A J Mansell, & M R Mansell do not agree with the submitter the range of amendments including additional wording and the deletion of parts of the policy, and the Explanation, are appropriate or necessary. These amendments to not retain the intent of Policy 55, which the submitter indicated they supported.</p>
S16.041 - Kāpiti Coast District Council	<p>Policy 56</p> <p>The submitter opposes the intent of the policy to place legal weight on the WRGF under the RMA and seeks deletion of the reference to the WRGF in clause d).</p>	Oppose	<p>R P Mansell; A J Mansell, & M R Mansell seek for the relief sought by the submitter to delete reference to the WRGF from Clause d) of Policy 56 be disallowed, and seek the current intent of Policy 56 to be retained.</p>	<p>R P Mansell; A J Mansell, & M R Mansell supported the intent of Policy 56 and sought for its current wording to be retained as managing development in rural areas is appropriate and necessary to implement the outcomes sought by the NPS-UD, and meet the sustainable management purpose of the RMA.</p> <p>R P Mansell; A J Mansell, & M R Mansell do not agree with the submitter that Policy 56 attempts to place legal weight on the WRGF, and that reference to the WRGF in Clause d) need to be deleted</p>

**FURTHER SUBMISSIONS OF WELLINGTON WATER LTD ON PROPOSED PLAN
CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION**

To: **Greater Wellington Regional Council**

Name of further submitter: **Wellington Water Ltd** ("Wellington Water")

1. This is a further submission in opposition to and support of submissions on Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region ("**PC1**").
2. Wellington Water's interest in these aspects of PC1 is greater than the general public's interest, because these aspects relate to provisions that affect freshwater, stormwater and wastewater infrastructure and services for which Wellington Water is responsible.
3. The attached table sets out extent and reasons for Wellington Water's support and opposition, and the outcomes Wellington Water is seeking.
4. Wellington Water wishes to be heard in support of its further submission.
5. If others make a similar submission, Wellington Water will consider presenting a joint case with them at a hearing.



M J Slyfield
Barrister
For and on behalf of Wellington Water Ltd

19 December 2022

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Telephone: 021 915 927

Postal Address: c/- Morgan Slyfield
Stout Street Chambers
PO Box 117
Wellington

Table 1: Ātiawa ki Whakarongotai

#	Stance	Reasons	Decision sought
S131.004	Support in part	Agree that the interim effect is not understood, however any changes need to be carefully considered as much of the work is currently underway rather than being complete	Accept with changes
S131.061	Support	Ki uta ki tai approach is appropriate for managing water bodies.	Accept
S131.066	Support in part	Ki uta ki tai approach is appropriate for managing water bodies if it provides for progressive improvement over an appropriate duration.	Accept with changes
S131.093	Support and oppose	Oppose (bb) as being redundant given the mention of Te Mana o te Wai in the chapeau. Ki uta ki tai approach is appropriate for managing water bodies if it provides for progressive improvement over an appropriate duration.	Accept and reject
S131.154	Oppose	Oppose inclusion of 'as soon as possible' as this work will take decades.	Reject

Table 2: Carterton District Council

#	Stance	Reasons	Decision sought
S025.023	Oppose	Doesn't provide sufficient certainty that the effects will be appropriately managed without matters falling into the gaps between councils.	Reject

Table 3: Dairy New Zealand

#	Stance	Reasons	Decision sought
S136.004	Oppose	Useful to have early indications about how to achieve Te Mana o te Wai in the RPS.	Reject

S136.017	Oppose	Te Mana o te Wai will take about a decade to fully realise in planning documents - an incremental approach is as valid as any other.	Reject
S136.019	Oppose	Te Mana o te Wai will take about a decade to fully realise in planning documents - an incremental approach is as valid as any other.	Reject
S136.021	Oppose	Te Mana o te Wai will take about a decade to fully realise in planning documents - an incremental approach is as valid as any other.	Reject

Table 4: Director-General of Conservation

#	Stance	Reasons	Decision sought
S032.013	Oppose	The unconsidered use of Te Mana o te Wai in coastal locations could bring the NPS-FM into play, without considering the impacts of implementing the NZCPS.	Reject
S032.015	Oppose	Not appropriate for management of the water in community supplies.	Reject

Table 5: Greater Wellington Regional Council

#	Stance	Reasons	Decision sought
S137.002	Support in part	The 20 year timeframe is unachievable. Where there are existing activities that impact on these outcomes, progressive improvement should be required.	Accept with changes
S137.003	Support in part	Not all the timeframes are achievable. Where there are existing activities that impact on these outcome, progressive improvement should be required.	Accept with change

Table 6: Hutt City Council

#	Stance	Reasons	Decision sought
S115.013	Support	Regional context would be helpful.	Accept
S115.037	Support	Regional context would be helpful.	Accept

Table 7: Irrigation New Zealand

#	Stance	Reasons	Decision sought
S086.001	Oppose	Water for community supplies should take precedence.	Reject
S086.002	Oppose	Water for community supplies should take precedence.	Reject

Table 8: Kāinga Ora

#	Stance	Reasons	Decision sought
S158.037	Oppose	The submission's approach fails to implement the NPS-FM	Reject

Table 9: Kapiti Coast District Council

#	Stance	Reasons	Decision sought
S016.049	Oppose	Doesn't provide sufficient certainty that the effects will be appropriately managed without matters falling into the gaps between councils.	Reject
S016.055	Oppose	Need as many tools available as possible.	Reject

S016.012	Support and oppose	Agree it's important to use the term 'and/or' carefully, but there are instances where it is appropriate. Wellington Water would like to be involved in any discussions about its use.	Reject and accept
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Table 10: Masterton District Council

#	Stance	Reasons	Decision sought
S166.017	Support	Appropriate for providing RSI.	Accept
S166.029	Oppose	Too challenging for wetlands set up to manage stormwater and wastewater discharges.	Reject

Table 11: Meridian

#	Stance	Reasons	Decision sought
S100.001	Support	Necessary for delivery of regionally significant infrastructure.	Accept
S100.004	Support	Necessary for delivery of regionally significant infrastructure.	Accept
S100.006	Support	Necessary for delivery of regionally significant infrastructure.	Accept
S100.021	Support	Important for enabling water treatment through artificial wetlands.	Accept

Table 21: Porirua City Council

#	Stance	Reasons	Decision sought
S030.044	Support in part	Support improving the clarity of the policy, however, the wording may need to be further refined to achieve the intended outcomes.	Accept with changes

Table 13: Rangitāne O Wairarapa Inc

#	Stance	Reasons	Decision sought
S168.041	Oppose	Not appropriate for management of the water in community supplies.	Reject

Table 14: Royal Forest and Bird Protection Society of NZ Inc

#	Stance	Reasons	Decision sought
S165.019	Oppose in part	The timeframe is unrealistic. Where there are existing activities that impact on these outcomes, progressive improvement should be required.	Accept with changes
S165.052	Oppose	Overly inhibiting for delivery of RSI.	Reject
S165.069	Oppose	Overly inhibiting for delivery of RSI.	Reject
S165.076	Oppose	As we can't achieve 'avoid' in either title or clause(e) the policy framework needs to allow for progressive improvement.	Reject
S165.081	Oppose	There is too much uncertainty about coastal wetlands to include this provision.	Reject
S165.138	Oppose	The policy framework needs to allow for progressive improvement for existing activities.	Reject

Table 15: Taranaki Whānui ki te Upoko o te Ika

#	Stance	Reasons	Decision sought
S167.027	Support in part	Support concept but the relief sought provides insufficient clarity.	Accept with changes
S167.028	Support in part	Support concept but the relief sought provides insufficient clarity.	Accept with changes

Table 16: BP Oil NZ Ltd, Mobil Oil NZ Ltd, Z Energy Ltd (the Fuel Companies)

#	Stance	Reasons	Decision sought
S157.024 -031	Oppose	The submission's approach fails to implement the NPS-FM and changes to clause (j) don't provide for drinking water protection.	Reject
S157.044	Oppose in part	Agree these works are important but no provision has been made for drinking water source protection.	Reject
S157.046	Support	Improved clarity of definitions is always helpful	Accept
S157.047	Support	Maintenance is already a very high bar and should mean what it says, rather than representing an aspiration.	Accept

Table 17: Wairarapa Federated Farmers

#	Stance	Reasons	Decision sought
S163.022	Oppose	It is useful to have clarity about Te Mana o te Wai.	Reject
S163.062	Oppose	The provisions provide useful guidance for regional implementation of the RMA	Reject
S163.079	Oppose	The provisions provide useful guidance for regional implementation of the RMA.	Reject
S163.087	Oppose	The provisions provide useful guidance for regional implementation of the RMA.	Reject
S163.002	Oppose	The provisions provide clarity about integrated management.	Reject
S163.008	Oppose	The provisions provide clarity about climate change.	Reject
S163.042	Oppose	The provisions provide useful guidance for regional implementation of the RMA.	Reject

Table 18: Wellington City Council

#	Stance	Reasons	Decision sought
S140.046	Oppose	FW.3 should be retained with changes as per Wellington Water's primary submission.	Reject
S140.074	Support	It's important that regionally significant infrastructure can locate in high risk locations	Accept
S140.083	Support in part	Improved clarity for riparian management would be useful	Accept with changes

Table 19: Wellington International Airport Ltd (WIAL)

#	Stance	Reasons	Decision sought
S148.012	Support	Flexibility for regionally significant infrastructure will be critical to achieving the outcomes of the RPS.	Accept
S148.016	Support	The suggested change would more appropriately provide for infrastructure	Accept
S148.046	Support	The suggested change is appropriate for providing RSI	Accept

Table 20: Beef + Lamb New Zealand Limited

#	Stance	Reasons	Decision sought
S78.001	Oppose	Wholesale withdrawal of provisions is not justified by the submitter's stated reasons. Further, the submission may lead to the provisions being retained, but amended in ways that are presently unknown due to the lack of specificity in the submission, which is opposed so as to ensure Wellington Water can have appropriate input in relation to any such amendments.	Reject

Table 21: Wellington Fish and Game Council

#	Stance	Reasons	Decision sought
All parts of S147 that seek amendments to PC1	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Reject



Ātiawa ki Whakarongotai Charitable Trust
10 Parata Street
Waikanae 5036

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Greater Wellington Regional Council
regionalplan@gw.govt.nz
(See also, distribution list below)

19 December 2022

Form 6: Submission on Proposed Plan Change 1 to Regional Policy Statement for the Wellington region

Mai i Kūkūtauākī ki Whareroa, tatu atu ki Paripari
Rere whakauta ngā tinitapu ko Wainui, Ko Maunganui,
Pukemore, Kapakapanui, Pukeatua,
Ūngutu atu ki te pou whakararo ki Ngāwhakangutu
Ko Te Ātiawa ki Whakarongotai e

Our unique identity as indigenous mana whenua, as Ātiawa ki Whakarongotai (Ātiawa), arises from the land and water. As much as we influence the local land and waterscapes, they have shaped who we are as a people; our identities are inextricably linked. The pepeha outlines our rohe from the key waterways and peaks that mark the extent of our mana whenua. Whakapapa, or the genealogical lineage and connection to the land and water, is a fundamental value for the people of Ātiawa. It is through this whakapapa to Ātiawa that we inherit our birthright and responsibility as kaitiaki of all that is living and existing within our rohe.

Ātiawa is submitting as a person that has an interest in the proposed policy statement greater than the interest that the general public has. I would like my address for service to be my email.

Ātiawa acknowledges the mana of the recognised hapū and iwi of the greater Wellington region, and supports their mana moutuhake within their rohe.

I wish to be heard in support of my further submission.

Nāku iti noa, nā

Melanie McCormick

Submitter name and address for service:	Submission point number:	Support/Oppose:	Reasons:	Decisions Sought:
Aggregate and Quarry Association (AQA) and Winstone Aggregates	S29.001-S29.006, and S162.001-S162.042	Oppose	<p>Ātiawa oppose the submissions from Aggregate and Quarry Association and Winstone Aggregates to the extent that the relief sought is inconsistent with national direction, particularly the NPS-FM.</p> <p>Ātiawa are particularly sensitive to aggregate extraction from awa, it is mana whenua who are guaranteed tino rangatiratanga over the land, waterways and all other taonga (including aggregate) through Te Tiriti o Waitangi. Historically aggregate extraction industry has failed to uphold the articles and the principles of Te Tiriti. Additionally, aggregate extraction has adverse effects on te taiao and mana whenua values.</p> <p>On the matter of 'balancing' national policy statements', recent case law states that the NPS-FM 2020 and NPS-UD 2020 are to be read together and reconciled under the regional policy statement and the district plans. It goes on to say, development capacity does not outweigh (trump) Te Mana o te Wai. Te Mana o te Wai is the fundamental concept of freshwater management: any thinking to the converse would not give effect to either national policy statement. Therefore, to reconcile national direction, it is not a balancing act, or even a compromise, the NPS-FM must be given effect to while achieving the purpose of the NPS-UD for example. This can be applied to aggregate extraction, the activity must be consistent with Te Mana o te Wai and the NPS-</p>	Oppose the submission from Aggregate and Quarry Association and Winstone Aggregates.

			FM. The need for housing capacity is not license to forgo the requirements of the NPS-FM.	
Beef + Lamb New Zealand Limited	S78.001-S78.040	Oppose	<p>Ātiawa oppose the entire submission by Beef + Lamb New Zealand Limited. The relief sought by Beef + Lamb is to withdraw all proposed amendments, apart from those which give effect to NPS-UD.</p> <p>The basis for deleting the proposed amendments (apart from NPS-UD provisions) is to delay decision-making until further national direction is gazetted or until the scheduled full review of the RPS. Ātiawa do not accept that delaying proposed RPS Change 1 is an appropriate course of action, further delays would permit further degradation of te taiao and continue to have perverse outcomes for mana whenua.</p>	Disallow the relief sought where the submitter seeks the deletion of proposed amendments.
Director General of Conservation	S32.004	Support in part	Ātiawa support iwi/mana whenua statements inclusion in Objective 12. Ātiawa support in part, providing further clarity on how iwi/mana whenua statements are to be applied, iwi/mana whenua statements are a mechanism to give effect to the NPS-FM and Te Mana o te Wai.	Allow in part. Ātiawa seek that the council partner with mana whenua to ensure their statements are applied as intended by mana whenua in keeping with resource management legislation.
Director General of Conservation	S32.011	Support in part	There is no one single action that gives effect to Te Mana o te Wai. In its most simple expression, Te Mana o te Wai will be given effect to when the mauri of our arawai are healthy and thriving (and the NPS-FM has been implemented). Therefore, expanding reference to include 2.2, while useful to include for policy direction, does not provide an exhaustive list for giving effect to Te Mana o te Wai.	Allow the submission point.

			<p>In addition, as it is drafted the sections referenced by the council directly reference the matters covered in Policy 12.</p> <p>Ātiawa, however do not see any harm in included reference to section 2.2.</p>	
Director General of Conservation	S32.011	Oppose	<p>Ātiawa oppose Policy 13, current water allocation policy and mechanism are not mana enhancing for mana whenua, nor does this approach reflect Te Tiriti o Waitangi which guaranteed tino rangatiratanga over the land, waterways and all other taonga. Policy 13 is outdated policy and not in accordance with the NPS-FM.</p> <p>Salt water intrusion and taking into account aquatic ecosystem health will be better provided for and addressed by readdressing water allocation, as provided for by the NPS-FM.</p>	Disallow. Retain deletion of operative Policy 13 as notified.
Director General of Conservation	S32.013	Support	<p>Ātiawa recognise the impact that urban development can have and continues to have on the coastal marine area, and therefore the need to protect the coastal marine area from urban development.</p>	Allow the submission point.
Director General of Conservation	S32.014	Support in part	<p>As stated in our original submission, the current drafting does not provide strong policy direction, the words 'to the extent necessary' are open to interpretation, and are a soft approach to the management earthworks and vegetation disturbance. Ātiawa has suggested the deletion of those words to ensure target attribute states are achieved and mana whenua values are provided for.</p>	<p>Disallow deleting proposed Policy 15 and retain operative Policy 15. Ātiawa do not support this outcome, the operative version of the policy does not provide for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga as provided for by first, Te Tiriti and the RMA.</p> <p>In addition, disallow the Director's other suggestion of maintaining both policies, it is</p>

			<p>Ātiawa recognise there is a timing issue where target attribute states are yet to set, Ātiawa seek to work with council to determine an approach where this is an issue.</p>	<p>unclear what the threshold would be to decide what version (operative or proposed) of the policy is applied. Also, no timeframe has been provided for when the operative version would expire.</p>
Director General of Conservation	S32.015	Support in part	<p>Ātiawa acknowledge the real concern set out by the Director General of Conservation, that industry and agriculture are actively seeking to be included under the second priority (of the hierarchy of obligation).</p> <p>Ātiawa support provisions that enforce the hierarchy of obligations. As it is drafted Policy 17 and the explanation provide clear guidance on how the policy is to be interpreted, in particular, that any take and use of water must be for the health needs of people.</p>	<p>Allow in part, in so far as clarifying the provisions enforces the intent of the hierarchy of obligations as set out in the NPS-FM, particularly that health needs of people directs takes and use to be for uses such as drinking water.</p>
Director General of Conservation	S32.016	Oppose	<p>It is not clear from the Director's explanation the reason why these changes are requested.</p> <p>It is difficult to follow how the changes requested by the Director would have any difference in effect, the reasoning provided talks about the appropriateness of "restricting" activities, and then the decision sought seeks to the wording of the policy that provides for Māori freshwater values. Which is not related to "restricting" activities. Ātiawa do not support this rationale, it is not appropriate for the Director General of Conservation to seek to change the effect of Māori freshwater values through this process.</p>	<p>Disallow the submission point.</p>
Director General of Conservation	S32.017, S32.025, S32.026, S32.033	Support	<p>Ātiawa support actions that enable streams to flow, move and meander naturally, including daylighting of streams.</p>	<p>Allow the submission point.</p>

Director General of Conservation	S32.020	Support in part	Ātiawa acknowledges that it is important to avoid development in areas where risk is high to extreme; however any remnants of land held by Māori that trigger this policy would be significantly limited. Ātiawa, alongside Māori landowners would like to work with Regional Council to determine which areas are affected by natural hazards (both low/tolerable and intolerable) to work together through any issues that capture land held by Ātiawa ki Whakarongotai uri.	Allow in part, allow suggested amendment in so far as council agree to partner with mana whenua to identify risks and the appropriateness of activities in the coastal environment.
Director General of Conservation	S32.022	Support	Ātiawa support strengthening provisions to ensure that the health and well-being of water bodies and freshwater ecosystems are protected and enhanced.	Allow the submission point.
Director General of Conservation	S32.024	Support	Ātiawa support strengthening provisions to ensure that the coastal marine area is protected from the impacts of urban development.	Allow the submission point.
Director General of Conservation	S32.027	Support	The Director has identified a minor error, Ātiawa support the correction of this clause.	Allow the submission point.
Director General of Conservation	S32.028	Support	Ātiawa support including operative subclause (b), it is a relevant consideration to include climate change and sea level rise which will exacerbate natural hazards.	Allow the submission point.
Horticulture New Zealand	S128.025	Oppose	Ātiawa are concerned that the relief sought minimises the intent of the NPS-FM, we oppose this approach. In regards to achieving visions for freshwater management, objectives, policies, and rules must be set to a standard that will achieve these visions, not only to contribute to achieving the visions.	Disallow the relief sought.
Horticulture New Zealand	S128.027	Oppose	Ātiawa oppose the submission point. Ātiawa support the notified version of Policy 17. The relief sought does not accurately reflect the intent of hierarchy of obligations – the first being, the health	Disallow the submission point.

			and well-being of water bodies and freshwater ecosystems. This priority is paramount and must be upheld, before resource decision-makers and user begin to consider water takes. The relief sought softens this approach, this is contrary to the legislation.	
Horticulture New Zealand	S128.029	Oppose	Ātiawa oppose the relief sought by the submitter. Domestic food production is provided for under the third priority of the hierarchy of obligations. It would be inappropriate and contrary to the national legislation for regional council to accept this submission point.	Disallow the submission point.
Horticulture New Zealand	S128.036	Oppose	Ātiawa oppose the submission point. Allowing non-habitable agricultural/horticultural infrastructure where the hazard and risks are assessed as high to extreme creates unnecessary risk – risk that the materials held in these facilities could cause damage to te taiao in a hazard event, additionally, landowners may then lobby council to provide protection to hazards (e.g. increase or maintain stop banks) to protect their investment in infrastructure.	Disallow the submission point.
Horticulture New Zealand	S128.037	Oppose	As Treaty Partners, Ātiawa ki Whakarongotai are guaranteed tino rangatiratanga over land, waterways and all other taonga in our rohe. Tino rangatiratanga should be enacted at all levels of decision-making, from governance and decision-making, through to the social and technical inputs into decision-making, into the analysis of decision-making, and in ensuring compliance with decision-making and other types of regulation. We note that, Ātiawa already have partnership arrangements with local authorities that include the consenting level, Ātiawa seek to ensure these	Disallow the submission point.

			partnership arrangements under Te Tiriti o Waitangi are protected.	
Horticulture New Zealand	S128.037	Oppose	Ātiawa oppose the submission point, as in our original submission, Ātiawa is pleased that the notified Policy IM.1 supports Te Tiriti; the policy principally recognises and upholds several core concepts that are fundamental to te ao Māori approach to resource management, including working in partnership with local government, ki uta ki tai/integrated management, mātauranga Māori.	Disallow the submission point.
Horticulture New Zealand	S128.047	Oppose	Ātiawa oppose the relief sought, the inclusion would provide for increased structural protection works and hard engineering in areas such as along the awa (i.e. stop-banks and works in the awa). Stop-banks limit the ability for streams to move naturally, and works in the awa have adverse effects for freshwater ecosystems, including mahinga kai and other mana whenua values (including sites, wāhi tapu and other taonga). These activities and the outcomes are contrary to Ātiawa are opposed to these works and seek the council avoid adopting a planning framework that provides for these activities to occur.	Disallow the submission point.
Irrigation New Zealand (IrrigationNZ)	S86.001	Oppose	Ātiawa do not support the relief sought by the submitter, it is not appropriate for regional council to amend national policy. In order to implement and achieve Te Mana o te Wai including the hierarchy of obligations it must be applied as intended and instructed by the NPS-FM.	Disallow the relief sought.
Irrigation New Zealand (IrrigationNZ)	S86.002	Oppose	Ātiawa oppose the submission point, we refer to recent case law on the matter of 'balancing' national policy statements', which states that the NPS-FM 2020 and NPS-UD 2020 are to be read	Disallow the submission point.

			<p>together and reconciled under the regional policy statement and the district plans. It goes on to say, development capacity does not outweigh (trump) Te Mana o te Wai. Te Mana o te Wai is the fundamental concept of freshwater management: any thinking to the converse would not give effect to either national policy statement. Therefore, to reconcile national direction, it is not a balancing act, or even a compromise, the NPS-FM must be given effect to while achieving the purpose of the NPS-HPL for example.</p>	
Irrigation New Zealand (IrrigationNZ)	S86.003, S86.004	Oppose	<p>Ātiawa oppose the submission point to the extent that Ātiawa do not think there is any ambiguity with these provisions. The provisions enable mana whenua to exercise kaitiakitanga and rangatiratanga in resource management decision-making. This is provided for under Te Tiriti o Waitangi and the RMA and recent national policy statements (including NPS-FM, NPS-HPL, NPS-UD).</p> <p>Ātiawa acknowledge that kupu Māori/Māori words and concepts may be foreign to plan users and perhaps the Council themselves. As a Treaty Partner, Ātiawa are committed to holding to account the regional council and resource users the intent and application of concepts and words.</p>	Disallow the submission point, noting that there is already an obligation for the Crown to partner with mana whenua.
Kāinga Ora Homes and Communities	S158.001	Oppose	<p>Ātiawa strongly oppose the submission point, it would be inappropriate to delete Chapter 4.2, the chapter contains important strategic policy direction to plan users on how te taiao must be managed, in accordance with Te Tiriti o Waitangi, the RMA, national policy and other statutory direction.</p>	Disallow the submission point.

Kāinga Ora Homes and Communities	S158.009	Oppose	<p>Ātiawa oppose the submission point, the outcome of the provision, is to enable and empower mana whenua to exercise their tino rangatiratanga. Practically, this may look like, partnering with mana whenua to develop climate change mitigation and adaptation strategies and plan changes to respond to these strategies where necessary, or partnering with mana whenua to apply mātauranga Māori to manage areas identified as at risk of climate change impacts.</p> <p>As Treaty Partners, local authorities are obligated to mana whenua to enable resource management is empowering to mana whenua.</p>	Disallow the submission point.
Kāinga Ora Homes and Communities	S158.010	Oppose	The relief sought is inappropriate given the risk the region faces due to the impacts of climate change. The regions response to climate change must be to minimise and avoid risks from natural hazards and climate change.	Disallow the submission point.
Kāinga Ora Homes and Communities	S158.012	Oppose	<p>Ātiawa oppose the relief sought to the extent that it is inconsistent with our original submission. In particular, Ātiawa oppose the amendment sought by Kāinga Ora which seek to minimise the intent of other national direction (particularly, NPS-FM and NPS-IB). Recent case law sets out that the NPS-UD and NPS-FW must be read together and reconciled under regional policy statements. Therefore, any amendments that seek to minimise the NPS-FM must be disallowed.</p> <p>Additionally, Ātiawa strongly oppose the amendment where it seeks to delete reference to mana whenua values. This is inappropriate and offensive to Ātiawa. Not only are our values and the role of mana whenua provided for through the</p>	Disallow the submission point.

			RMA and national direction (NPS-UD, NPS-FM and draft NPS-IB), but our partnership with regional council is enacted through Te Tiriti o Waitangi.	
Kāinga Ora Homes and Communities	S158.036	Oppose	Ātiawa oppose the submission point, development manuals and design guides are an integral part of informing development. In part, such manuals and guide are a mechanism to enable mana whenua to partner with the council to have input into urban development. The relief sought effectively minimises opportunities to include mana whenua in the design and development of urban development.	Disallow the submission point.
Kāinga Ora Homes and Communities	S158.037	Oppose	<p>Ātiawa strongly oppose the relief sought. Objective 22 as notified sets out all the components of well-functioning urban environments, to accept the relief sought would result in a continuation of the status quo (i.e. inappropriate subdivision, use and development and degradation of te taiao). This is unacceptable to Ātiawa, it is also contrary to NPS-UD, but also NPS-FM and the draft NPS-IB.</p> <p>Well-functioning urban environment requires an all-encompassing, integrated approach to resource management.</p> <p>Additionally, relief sought to delete (h) referencing mana whenua values is unconstitutional and offensive to Ātiawa. Not only are our values and the role of mana whenua provided for through the RMA and national direction (NPS-UD, NPS-FM and draft NPS-IB), but our partnership with regional council is enacted through Te Tiriti o Waitangi.</p>	Disallow the submission point.

Kāpiti Coast District Council	S16.009-S16.010	Oppose	Under the s7(i) all person's 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 the effects of climate change. This includes city and district councils, it is important that Kāpiti Coast District Council takes a leadership role in working with Greater Wellington Regional Council and mana whenua to achieve climate change adaptation and mitigation.	
Kāpiti Coast District Council	S16.013	Oppose	While Ātiawa acknowledge the limitations set out by the RMA in regards to iwi authorities, Ātiawa oppose the relief sought by Kāpiti Coast District Council. There are examples of hapū that are mandated on behalf of their iwi to represent their hapū interest in resource management processes, this requires careful consideration of how hapū and iwi and local authorities work together in this space.	Disallow the submission point.
Kāpiti Coast District Council	S16.014, S16.024	Oppose	Kāpiti Coast District Council have a role in roading, subdivision, use and development and therefore transportation. District and city councils should take a leadership role in ensuring that any resource consents that involve the design, construction, operation (including maintenance) of roads actively contribute to reducing green house gas emission. Kāpiti Coast District Council should consider climate change as part of their decision-making processes during the resource consent application process.	Disallow the submission point.
Kāpiti Coast District Council	S16.015, S16.016	Oppose	Kāpiti Coast District Council should take a leadership role in supporting and providing for outcomes that will result in reduce in green house gas emissions. While Kāpiti Coast District Council cannot influence individual choice, it can	Disallow the submission point.

			incentivise and disincentive actions, including developing travel management plans as part of resource consent applications. Considering the impacts of climate change is part of their role as decision-makers under the RMA.	
Kāpiti Coast District Council	S16.017	Oppose	Ātiawa oppose the rationale set out by Kāpiti Coast District Council. Ātiawa refer to s31 of the RMA which clearly sets out the roles and responsibilities of territorial authorities, while s7(i) of the Act sets out that particular regard shall be given to the impacts of climate change. Additionally, the NPS-UD also direct decision-makers to have particular regard to the likely current and future effects of climate change. These pieces of legislation explicitly define the role of territorial authorities to have particular regard to the impacts of climate change when considering land use and development (including subdivision). It is disappointing to that Kāpiti Coast District Council have taking this position, local authorities must consider and plan for climate change as a matter of law and to protection current and future generations.	Disallow the submission point.
Kāpiti Coast District Council	S16.020, S16.021, S16.022, S16.025	Oppose	Ātiawa are disappointed with the regressive approach taken by Kāpiti Coast District Council in regard to nature based solutions to climate change. It is evident that current approaches to managing the environment are inadequate, and that options such as nature-based solutions could provide better outcomes, culturally, socially and economically. While nothing in legislation specifically requires local authorities to consider nature-based solutions, the RMA (s7) and the NPS-UD (Objective 8, Policy 1, Policy 6) all require local authorities to have particular regard to the	Disallow the submission point.

			effects of climate change in resource management decision making and provide well-functioning urban environment that are resilient to the effects of climate change, which could include options such as nature-based solutions and mātauranga Māori.	
Kāpiti Coast District Council	S16.027	Oppose	Ātiawa strongly oppose Kāpiti Coast District Council's reasoning, giving effect to Te Mana o te Wai is required by the NPS-FM. The impacts of urban development on freshwater ecosystems, including Te Mana o te Wai must be considered by resource management decision-makers. While the suggestions put forward by Kāpiti Coast District Council would have benefit for te taiao, however they would not fulfil the requirements set out by the NPS-FM.	Disallow the submission point.
Kāpiti Coast District Council	S16.030	Oppose	Ātiawa oppose the submission point and the rationale set out by Kāpiti Coast District Council. As in our original submission, Ātiawa supports ensuring that resource management creates fair and equitable outcomes and avoids exacerbating inequalities.	Disallow the submission point.
Kāpiti Coast District Council	S16.060	Support in part	Ātiawa note that Council should consult with mana whenua/tangata whenua, iwi and hapū to determine the most appropriate term. Ātiawa note that the term should refer to the group that hold undisturbed collective whakapapa relationship to the whenua.	Disallow the relief sought, mana whenua/tangata whenua, iwi and hapū should first have the opportunity to wānanga this together and with Greater Wellington Regional Council.
Kāpiti Coast District Council	S16.062	Oppose	Ātiawa strongly oppose the reasoning set out by Kāpiti Coast District Council. The rationale is flawed and unfounded, Te Tiriti o Waitangi, the RMA and the NPS-FM all provide for mana whenua to exercise their kaitiakitanga over our ancestral lands, water, sites, wāhi tapu and other	Disallow the submission point.

			taonga. Ātiawa note that indigenous biodiversity includes freshwater ecosystems.	
Kāpiti Coast District Council	S16.079		While Ātiawa acknowledge the work Kāpiti Coast District Council has done with the ĀRT collective in regards to their own provisions for papakāinga. The amendments cannot be transferred to the regional policy statement without additional changes, specifically expanded the definition of papakāinga to include ancestral lands (meaning “Ancestral Land means land where mana whenua/tangata whenua have an undisturbed collective whakapapa relationship.”). Without these changes we do not support the proposed amendment by Kāpiti Coast District. Ātiawa recognise the scope of further submission must be limited to those matters raised in submissions. No new material may be brought up in further submissions. Therefore, limiting the scope of our comments.	Disallow the submission point.
Muaūpoko Tribal Authority	S133.001- S133.076	Oppose	<p>Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai.</p> <p>While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti</p>	Disallow the whole submission.

			<p>Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act).</p> <p>There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori.</p> <p>Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised.</p> <p>We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these</p>	
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			<p>must be left to the Crown, and that settlements must not pre-empted.</p> <p>Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.</p>	
Templeton Kāpiti Limited (TKL)	S126.001, S126.010	Oppose	<p>Ātiawa vehemently oppose the submission by Templeton Kāpiti Limited. Ātiawa take an active interest in this submission point, Ngāti Puketapu hapū are mana whenua in regards to the whenua where the Kāpiti Coast Airport is currently located.</p> <p>Ātiawa have not finalised our Treaty of Waitangi Settlement with the Crown it is therefore inappropriate to make further decisions in relation to this whenua given its history and Crown concessions that it breached Te Tiriti o Waitangi, and its own laws in relation to the surplus land sold.</p> <p>It is offensive to Ātiawa for the 'landowner' to suggest that this whenua should be enable for residential purposes given its illegitimate and unlawful possession.</p>	Disallow the submission point. Ātiawa request that Greater Wellington Regional Council engage with Ngāti Puketapu hapū who are mana whenua in regards to the whenua where the Kāpiti Coast Airport is currently located.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.001	Oppose	<p>Ātiawa note that the submitters admission regarding their lack of understanding on what an integrated management approach that is guided by Te Ao Māori would mean, Ātiawa note that this understanding is held by mana whenua, and as Treaty Partners we are committed to ensuring</p>	Disallow the submission point.

			these provisions are upheld and interpreted as intended.	
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.013	Support	Ātiawa support the amendment sought by Forest and Bird, it is a much more integrated approach to include the margins of freshwater environments. The relief sought is in-line with the RMA.	Allow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.015, S165.016, S165.017, S165.018	Support	Ātiawa support the recognised mana whenua of the Wellington region expressing Te Mana o te Wai relevant to their rohe.	Allow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.019	Oppose	While Ātiawa acknowledge the concerns raised by Forest and Bird, however, we do not support an overarching vision, it is not clear which vision would take a precedent (i.e. the FMU vision or 'overarching vision') in practice. In addition, Ātiawa support recognised mana whenua to work in partnership with regional council to identify their own vision statements as provided for by the legislation.	Disallow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.021	Oppose	Ātiawa do not support this submission point, Ātiawa seek policy relief that prioritise the protection of indigenous ecosystems over exotic/introduced ecosystems.	Disallow the submission point..
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.025	Support in part	Ātiawa support Objective 16C and the intention to recognise and provide landowner and community values, provided that the Council's relationship with mana whenua is upheld and supported in regards to Te Tiriti o Waitangi.	Allow the submission point..
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.027, S.165.030	Support	Ātiawa support these amendments, and seek that the provisions are retained as notified.	Allow the submission point..
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.034	Support in part	In principle, Ātiawa support the rationale set out by Forest and Bird. Ātiawa support actions to reduce greenhouse gas emissions, particularly the transport infrastructure should consider ways to reduce greenhouse gas emissions as part of their design, construction and operation. Ātiawa seek	Allow in part, provided that regional council engage sectors of the community that are vulnerable to transport decision-making outcomes as provided in our original submission.

			that planning provisions that maximise mode shift away from private vehicles does not exacerbate existing inequalities.	
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.036	Support in part	Ātiawa seek to ensure that the enabling of infrastructure does not cause adverse effects for indigenous biodiversity.	Allow the submission point..
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.038	Support	Ātiawa support the amendment suggested by Forest and Bird to ensure that any land use change is avoided where it will contribute or result in an increase in gross greenhouse gas emissions.	Allow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.039	Support in part	As in our original submission, Ātiawa support supports the overall intent of Policy CC.6 to increase permanent forest cover to reduce greenhouse gas emissions, promoting and incentivising indigenous forest cover and avoiding plantation forestry on highly erodible land. Ātiawa is concerned that this policy could affect whānau, hapū, and iwi that have an interest in plantation forestry. In addition, Ātiawa support in part reference to 'vegetation' over 'forest', provided that it is the right species in the right place.	Allow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.041	Support in part	As in our original submission, in principle Ātiawa supports the intent of Policy CC.8. However, the Policy (and RPS Change 1) lacks sufficient detail on how activities will be identified and how scale will be determined. It is concerning that some activities could be excluded from prioritising reducing greenhouse gas emissions over offsetting, particularly hard-to-abate sectors	Allow in part the relief sought, to the extent that additional policy direction to require that where there is no possible alternative to reducing greenhouse gas emissions, offsets must be achieved by the planting of indigenous vegetation over plantation forestry.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.048	Support in part	Ātiawa support the deletion of Policy 13.	Allow the submission point.

Royal Forest and Bird Protection Society of New Zealand Inc.	S165.052	Support in part	Ātiawa support clarifying and ensuring that the intent of the hierarchy of obligations is upheld.	Allow in part, allow the amendment sought to clarify the intended use of subclause (c), noting that the NSP-FM defines the second priority as 'the health needs of people (such as drinking water).
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.053, S165.054	Support	Ātiawa supports in principle reducing demand on water supply and encouraging more efficient use of water.	Allow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.055	Support	Ātiawa support the relief sought by Forest and Bird to tighten controls to ensure that NPS-FM is given effect to.	Allow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.073	Support	Ātiawa support the relief sought by Forest and Bird	Allow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.0109	Oppose	Ātiawa seek to ensure the relationship between the partnership between mana whenua and local authorities is upheld as provided for by Te Tiriti o Waitangi.	Disallow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.1121	Support	Ātiawa support this submission point.	Allow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.0119, S165.0122, S165.0123	Oppose	Ātiawa do not support the reasoning and relief sought by Forest and Bird in regards to these submission points. As in our original submission, Ātiawa support partnering with mana whenua to develop an inventory of opportunities for biodiversity offsetting or biodiversity compensation. Ātiawa's position is that priority should be given to protecting, maintaining or enhancing biodiversity. Ātiawa seek that this partnership approach shall be enabled through funding and resourcing.	Disallow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.0125, S165.0126	Support in part	Ātiawa seek to ensure that the definitions of Biodiversity Offsetting and Biodiversity Compensation are clarified to ensure they are implemented as intended.	Allow the submission point.
Royal Forest and Bird Protection Society of New Zealand Inc.	S165.0127 – S165.0139	Support in part	Ātiawa seek that the definitions are retained as drafted.	Disallow the submission point, and retain the definitions as drafted.

Royal Forest and Bird Protection Society of New Zealand Inc.	S165.0147	Oppose	As in our original submission, Ātiawa support partnering with mana whenua to develop an inventory of opportunities for biodiversity offsetting or biodiversity compensation. Ātiawa's position is that priority should be given to protecting, maintaining or enhancing biodiversity. Ātiawa seek that this partnership approach shall be enabled through funding and resourcing.	Disallow the submission point.
Wairarapa Federated Farmers	S163.001-S163.0114	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow the entire submission by Wairarapa Federated Farmers.
Waka Kotahi NZ Transport Agency	S129.016, S129.022	Oppose	Ātiawa oppose these submission point, the rationale is incorrect – the draft NPS-IB sets out that (in many clauses) that indigenous biodiversity must be protected. Given the extent of the loss of indigenous biodiversity it would be inappropriate to only manage the remnants, there must be conscious action (including strong policy direction) to protect, restore and enhance indigenous biodiversity.	Disallow the submission points.
Wellington Fish and Game Council	S147.001-006	Support in part	Ātiawa are generally supportive of the proposed changes by GWRC, provided that the suggested amendments by Ātiawa (in our original submission)	Allow in part, Ātiawa seek the relief sought as stated in our original submission. We support

			are accepted. Ātiawa in principle support the changes necessary to give effect to the NPS-FM.	the overall intent of these changes to give effect to the NPS-FM.
Wellington Fish and Game Council	S147.007	Support in part	Ātiawa also support the inclusion of the six principles of Te Mana o te Wai and their inclusion in RPS Change 1. At this time, Ātiawa do not support a single, integrated and succinct expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in Greater Wellington region.	Disallow the relief sought.
Wellington Fish and Game Council	S147.010, S147.013, S147.015, S147.017, S147.018, S147.022, S147.026, S147.055, S147.070, S147.0106, S147.0107, S147.0109	Oppose	Ātiawa do not support the relief sought where it relates to protecting habitats of trout and salmon without any proviso. Ātiawa refer to Policy 9 and Policy 10 of the NPS-FM to support this statement, which affords indigenous freshwater species greater protection than trout and salmon. Additionally, Ātiawa do not support the protection of trout and salmon which have adverse impacts on indigenous ecosystems. Generally the management and decision making in regards to trout and salmon species has not been undertaken within a Treaty Partnership with mana whenua. To accept the relief sought by the submitter would be contrary to Te Tiriti o Waitangi and the national resource management direction.	Disallow the relief sought in so far as it relates to the protection of trout and salmon.
Wellington Fish and Game Council	S147.011, S147.071	Support in part	Ātiawa support and encourage provisions that would result in protection of natural inland wetlands.	Allow in part the submission point in so far as it relates to the protection of natural inland wetlands. Ātiawa seek further clarification of what values are sought to be protected by this submission point, until this is clarified Ātiawa do not support reference to other values.
Wellington Fish and Game Council	S147.020, S147.021, S147.022, S147.023, S147.025, S147.027, S147.028, S147.029,	Oppose	Ātiawa do not support the rationale set out by Fish and Game, - indigenous ecosystems must be afforded the greatest protection above the protection of introduced ecosystems which already	Disallow the submission point.

	S147.029, S147.031, S147.032, S147.038–147.043, S147.045, S147.047, S147.098, S147.0100		dominate te taiao, to the detriment of indigenous ecosystems. The relief sought by the submitter would like result in a status-quo outcome for indigenous ecosystems, Ātiawa are opposed to this outcome.	
Wellington Fish and Game Council	S147.024, S147.099	Oppose	Ātiawa do not recognise Fish and Game as partners under Te Tiriti o Waitangi which is the basis for which the Council must partner with mana whenua.	Disallow the submission point.
Wellington Fish and Game Council	S147.030, S147.035, S147.037	Oppose in part	As Treaty Partners, Ātiawa do not support the submission point which seeks to provide community values, and introduced biodiversity equal weighting to indigenous biodiversity. It is evident that indigenous ecosystems must be provided with the greatest protection. To accept the relief sought by the submitter would be contrary to Te Tiriti o Waitangi and national resource management direction.	Disallow the relief sought that references: “within a wider framework of equal weighting given to community values around indigenous and valued biodiversity”.
Wellington Fish and Game Council	S147.034, S147.036	Oppose in part	Ātiawa oppose the relief sought, mana whenua have an important role as Treaty Partners in the management and maintenance of indigenous biodiversity. The relief sought seeks to minimise this role.	Disallow the relief sought.
Wellington Fish and Game Council	S147.089, S147.0104	Oppose in part	While Ātiawa recognise the role of stakeholders, landowners and community and the collective effort that must occur to result in meaningful outcomes for te taiao, first the Council must honour their partnership with mana whenua under Te Tiriti.	Disallow the relief sought.

As a requirement of Schedule 1 clause 8A of the Resource Management Act 1991 this further submission is also served on the following submitters:

Aggregate and Quarry Association (AQA)	jeremy@straterra.co.nz
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Beef + Lamb New Zealand Limited	Lilly.Lawson@beeflambnz.com
Director General of Conservation	mbrass@doc.govt.nz
Horticulture New Zealand	ailsa.robertson@hortnz.co.nz
Irrigation New Zealand (IrrigationNZ)	smcnally@irrigationnz.co.nz
Kāinga Ora Homes and Communities	developmentplanning@kaingaora.govt.nz
Kāpiti Coast District Council	Jason.holland@kapiticoast.govt.nz
Muaūpoko Tribal Authority	siobhan@kahuenviro.co.nz
Templeton Kāpiti Limited (TKL)	maddy@brownandcompany.co.nz
Royal Forest and Bird Protection Society of New Zealand Inc.	a.geary@forestandbird.org.nz
Wairarapa Federated Farmers	emcgruddy@fedfarm.org.nz
Waka Kotahi NZ Transport Agency	leticia.jarrett@nzta.govt.nz environmentalplanning@nzta.govt.nz
Wellington Fish and Game Council	pteal@fishandgame.org.nz
Winstone Aggregates	tyler.sharratt@winstoneaggregates.co.nz

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

Who can make a Further Submission:

A further submission may only be made by a person who:

- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

- Online using our submission portal *Spoken*, at: <https://tinyurl.com/gwrc-rps-change-furthersubs>
- Email your Further Submission and this completed form to: regionalplan@gw.govt.nz
- Post your Further submission and this completed form to: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser. **N.B. Due to delays in postal services and the timeframe for making Further Submissions we highly recommend that an electronic copy of your Further Submission is provided by the closing date OR delivered to one of our offices.**
- Drop your Further Submission and this completed form to reception at one of Greater Wellington's offices.

(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter

Name (First and Last) OR **Organisation / Company**: Stephen McNally, Principal Technical Advisor, Irrigation NZ

Address for Service (Email OR Postal Address): policy@irrigationnz.co.nz

Phone: 027 687 5299

Contact name and postal address for service of person making submission:

Stephen McNally
Principal Technical Advisor
Irrigation New Zealand
P O Box 8014, Wellington 6140

(If different from above)

Only certain people may make further submissions Please tick the option that applies to you:



I am a person representing a relevant aspect of the public interest; or



I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or

<input type="checkbox"/>	I am the local authority for the relevant area.
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Specify below the grounds for stating that you are within the category you have ticked:

IrrigationNZ represents over 3,500 members nationally, including irrigation schemes, individual irrigators, and the irrigation service sector. Our irrigator members include a wide range of farmers and growers – sheep and beef, dairy and cropping farmers, horticulturalists, and winegrowers. We represent over 120 irrigation service industry companies – manufacturers, distributors, irrigation design and install companies, and irrigation decision support services.

We are a voluntary-membership, not-for-profit incorporated society whose mission is to create an environment for the responsible use of water for food and fibre production.

Our membership includes a close working relationship with the Wairarapa Water Users Society which in itself has around 60 members who are rural water users who produce food and beverage products predominantly for human consumption

2. Appearance at hearing Please select from the following:

<input checked="" type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
<input checked="" type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearing

3. For the further submitter to action

Service of your further submission:

policy@irrigationnz.co.nz

Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**

Each submitter has an address for service available at: <https://www.gw.govt.nz/rps-pc-1-submissions>

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: Stephen McNally _____ **Date:** 16 / 12 / 2022 _____

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

All Further Submissions (including name and address for service) are made publicly available on our website. Your name and address for service will be used for correspondence during the hearing process. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

Please enter further submission points in the table on the following pages

4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

Submitter name or, Submitter number of the submission you are commenting on:	Submission point number: <i>Identified in the summary of decisions requested table</i>	Stance on the submission point: (Support, Oppose, Support in part, or Oppose in part)	Reasons: <i>Why you support or oppose this point</i>	Decision sought: (Allow, Disallow, Allow in part, or Disallow in part) <i>Identify the whole or part(s) of the submission point that this is in reference to</i>
Beef + Lamb NZ	S78.001	Support	The removal of the provisions related to Climate Change, Biodiversity and Fresh Water and only addressing the provisions to give effect to the NPS-UD will allow the other topics to be consulted on in more depth in a process separate to the RPS change 1.	Only retain elements in the RPS change 1 that give effect to the NPS-UD
	S78.002	Support	<u>Policy FW.7: Water attenuation and retention – non-regulatory</u> Promote and support water attenuation and retention including: (a) nature based solutions including slowing water down in the landscape and increasing groundwater recharge (riparian management, wetland enhancement/restoration, flood management); and (b) built solutions including storage at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds).	Retention of total Policy FW.7 to be more consistent with other work being conducted by GWRC and community outside the RPS change 1
Dairy NZ	S136.001	Support	The removal of the provisions related to Climate Change, Biodiversity and Fresh Water and only addressing the provisions to give effect to the NPS-UD will allow the other topics to be consulted on in more depth in a process separate to the RPS change 1.	Only retain elements in the RPS change 1 that give effect to the NPS-UD
	S136.017	Support	Addressing the implementation of Te Mana o te Wai in a more appropriate timeframe will lead to a better outcome.	Remove Policy 44
	S136.019	Partial Support	Given the importance of the FW provisions, formally stating that a collaborative approach will be undertaken will help to include all relevant viewpoints.	Retain FW.7 with the addition of an explicit reference to adopting a collaborative approach that includes the regulator, community and iwi to the extent they wish to be involved to setting implementation FW plans and tools to be consistent with the NPS Freshwater provisions.

	S136.021	Partial Support	Given the importance of the FW provisions, formally stating that a collaborative approach will be undertaken will help to include all relevant viewpoints.	Retain Method 48 with the addition of an explicit reference to adopting a collaborative approach that includes the regulator, community and iwi to the extent they wish to be involved to setting implementation FW plans and tools to be consistent with the NPS Freshwater provisions.
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Wairarapa Federated Farmers	S163.001	Support	The removal of the provisions related to Climate Change, Biodiversity and Fresh Water and only addressing the provisions to give effect to the NPS-UD will allow the other topics to be consulted on in more depth	Only retain elements in the RPS change 1 that give effect to the NPS-UD
	S163.083	Support	That due recognition is given to the community driven processes that resulted in the Ruamahanga Whaitua Implementation Plan and the Wairarapa Water Resilience Strategy	That the wording of Policy FW7 is amended to include references to the RWIP and the WWRS. These work programs and recommendation presented to GWRC that have included in their development the regulator, community and iwi to the extent they wish to be involved are consistent with the requirements for implementation of FW plans and as set out in the NPS Freshwater provisions.
Horticulture NZ	S128.013	Support	Recognition of the value to the community of highly productive land that allows food production	Add "The region also includes highly productive land, a finite resource which has long-term values for land-based primary production, including for food security."
	S128.018	Partial support	Support for the need to highlight the value of highly productive land but needs to link that with access to water	Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features identified in this RPS and highly productive land are managed effectively. This includes appropriate access to fresh water to enable the value of HPL class to be realised.
	S128.033	Support	All forms of water storage should be supported in both urban and rural environments including in-channel and at all sizes. The consenting process should be used to limit developments from having excessive negative effects. At the level of the RPS, all options should be on the table to mitigate Climate Change and produce food for human consumption.	As requested by Horticulture NZ
	S128.045	Support	Water storage should be supported in both urban and rural environments and not just urban	As requested by Horticulture NZ with the addition of wording to include both urban and rural environments.

Wairarapa Water Users Society	S145.003	Support	The recognition of both nature-based and built water capture and storage solutions is vital in allowing water to assist in achieving community wellbeing in Wairarapa and the rest of the region.	The RPS change 1 should in general recognize the significant community input into the Ruamahanga Whaitua and the Wairarapa Water Resilience Strategy. Both of these documents have been accepted by GWRC.

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

Who can make a Further Submission:

A further submission may only be made by a person who:

- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-planchange>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

- Online using our submission portal *Spoken*, at: <https://tinyurl.com/gwrc-rps-change-furthersubs>
- Email your Further Submission and this completed form to: regionalplan@gw.govt.nz
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(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter

Name (First and Last): Penny Nelson, Director-General of Conservation / *Tumuaki Ahurei* (The D-G)

Address for Service (Email OR Postal Address): mbrass@doc.govt.nz

Contact name and postal address for service of person making submission: Murray Brass, Private Bag 5244, Dunedin 9054, Phone 027 213 3592,

Only certain people may make further submissions Please tick the option that applies to you:

<input checked="" type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input checked="" type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input type="checkbox"/>	I am the local authority for the relevant area.

Specify below the grounds for stating that you are within the category you have ticked:

I represent a public interest in conservation, and have an interest in the proposal greater than the general public due to my statutory responsibilities for conservation.

2. Appearance at hearing Please select from the following:

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
<input checked="" type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearing

3. For the further submitter to action

Service of your further submission:

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Date: 19 December 2022

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

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Please enter further submission points in the table on the following pages

4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

Submitter name or, Submitter number of the submission you are commenting on:	Submission point number:	Stance on the submission point:	Reasons:	Decision sought:
Greater Wellington Regional Council (S137)	S137.002 – Insert freshwater vision for Te Awarua-o-Porirua	Support in part	The inclusion of FMU-specific freshwater visions is appropriate under the NPSFM, and supported by the D-G. However, as this vision has been introduced through the submission process, it is not clear why the specific content is proposed, nor why there are differences between this and other freshwater visions. Review is therefore sought to ensure that this vision is appropriate, and is consistent and integrated with the wider RPS vision framework.	Allow in part, with review to ensure that this vision is appropriate, and is consistent and integrated with the wider RPS vision framework.
	S137.003 – Insert freshwater vision for Whaitua te Whanganui-a-Tara	Support in part	The inclusion of FMU-specific freshwater visions is appropriate under the NPSFM, and supported by the D-G. However, as this vision has been introduced through the submission process, it is not clear why the specific content is proposed, nor why there are differences between this and other freshwater visions. Review is therefore sought to ensure that this vision is appropriate, and is consistent and	Allow in part, with review to ensure that this vision is appropriate, and is consistent and integrated with the wider RPS vision framework.

			integrated with the wider RPS vision framework.	
	S137.023 – Definition of Biodiversity Offsetting	Support	The proposed changes more accurately reflect the proposed approach of the RPS, and would better give effect to the NPSIB exposure draft.	Allow
	S137.024 – Definition of ecological integrity	Support	The proposed changes are appropriate in terms of ecological science, and would better give effect to the NPSIB exposure draft.	Allow
	S137.062 – Definition of minimise	Support	Adding a definition of ‘minimise’ will improve certainty of plan provisions, and improve clarity for the plan reader.	Allow
Royal Forest and Bird Protection Society (S165)	S165.001 – Overarching Objective A	Support	Adding more directive statements to protect the natural environment is appropriate under the RMA and higher order documents.	Allow
	S165.019 – Overarching freshwater vision	Support	The overarching freshwater vision proposed would improve integration and effectiveness across the RPS, and would better give effect to the NPSFM.	Allow
	S165.052 – Policy 18	Support	The requested changes would better give effect to the RMA, NZCPS and NPSFM. However, I note that the requested change to clause (q) appears to be lacking a verb, which	Allow, with the addition to clause (q) of “ discourage restricting <u>avoiding</u> the removal or destruction...”

			presumably should be “avoiding” for consistency with the other changes sought.	
	S165.069 – Policy 40	Support	The requested changes would better give effect to the NPSFM.	Allow
Taranaki Whānui (S167)	S167.001 – Insertion of new statement of Taranaki Whānui Freshwater Vision and Te Mana o Te Wai Expression	Support	The inclusion of iwi statements is appropriate under the NPSFM and supported by the D-G.	Allow
Te Runanga o Toa Rangatira (S170)	S170.001 – Insert a new 'Statement of Ngāti Toa Rangatira - Freshwater Vision	Support	The inclusion of iwi statements is appropriate under the NPSFM and supported by the D-G.	Allow

Add further pages as required

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



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- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

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<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

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- Drop your Further Submission and this completed form to reception at one of Greater Wellington’s offices.

(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter	
Name (First and Last) OR Organisation / Company: <u>Transpower New Zealand Limited</u>	
Address for Service (Email OR Postal Address): <u>environment.policy@transpower.co.nz</u> Phone: <u>03 590 6926</u>	
Contact name and postal address for service of person making submission: <u>Daniel Hamilton</u> (If different from above)	
Only certain people may make further submissions Please tick the option that applies to you:	
<input type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input checked="" type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input type="checkbox"/>	I am the local authority for the relevant area.
Specify below the grounds for stating that you are within the category you have ticked: Refer text below _____	

<hr/>	
2. Appearance at hearing Please select from the following:	
<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
<input type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearing
3. For the further submitter to action	
<p>Service of your further submission: Please note that any person making a further submission must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.</p> <p>Each submitter has an address for service available at: https://www.gw.govt.nz/rps-pc-1-submissions</p> <p>If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.</p>	

Signature: _____	Date: <u>19 December 2022</u>
Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.	

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

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Please enter further submission points in the table on the following pages

- Transpower is the owner and operator of the National Grid and the National Grid is enabled, protected and regulated by the National Policy Statement on Electricity Transmission 2008 (“NPSET”) and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (“NESETA”). The Proposed District Plan must give effect to the NPSET and must not duplicate or conflict with the regulations in the NESETA. Transpower has an interest in ensuring that the Proposed District Plan meets these statutory obligations.
- Transpower has an interest as a landowner and/or occupier in respect of existing and future National Grid infrastructure that is potentially affected (directly or indirectly) by the relevant submissions.
- Transpower made an original submission on matters raised or affected by other submissions.

Original Submission Details				Further Submission Details		
Submitter name and number	Sub point no.	Plan Change provisions	Reasoning and Relief sought by original submitter	Stance	Reasons	Decision sought
S137 Greater Wellington Regional Council (GWRC)	S137.062	General comments - definitions	<p>REASONING: Including a definition for 'minimise' would assist with clarity for the natural hazards provisions. Greater Wellington proposes to use the Natural Resources Plan definition for minimise, which was agreed to by all appellants.</p> <p>RELIEF SOUGHT: Insert new definition as shown below: Minimise -Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.</p>	Support	Given the term 'minimise' is used throughout the plan change, the provision of a definition consistent with that provided in the PNRP is supported and would assist with plan interpretation.	Allow
S30 Porirua City Council	S30.034	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	<p>REASONING: Low and zero carbon regionally significant infrastructure needs to be defined to improve clarity and regulatory certainty.</p> <p>RELIEF SOUGHT: 'Low and zero carbon' 'regionally significant infrastructure' needs to be defined to improve clarity and regulatory certainty.</p>	Support	The term "low or zero carbon" has not been defined within the RPS or the plan change and therefore it is unclear what it is intended to mean, particularly in the context of "low and zero carbon regionally significant infrastructure" within Policy 7. It is unclear whether the policy is referring to regionally significant infrastructure itself being low or zero carbon or whether it is a reference to a particular kind of regionally significant infrastructure that supports low/zero carbon emissions (for example a renewable energy supply, a transmission network to distribute renewable energy, a multi-modal transport network) or both. The explanation does not aid the interpretation and it is not clear what is meant by "in particular if regionally significant infrastructure is a low or zero carbon development".	Allow
S158 Kāinga Ora Homes and Communities	S158.041	Regionally significant infrastructure	<p>REASONING: Seeks that the definition is deleted to reflect the centres hierarchy proposed within Policy 30.</p> <p>RELIEF SOUGHT: Delete definition in its entirety.</p>	Oppose	The definition of Regionally significant infrastructure is used throughout the RPS and lower order policy documents and is supported in that it assists in plan interpretation and application and is a key definition. No clear reasoning or rationale	Disallow

					is provided for its removal noting policy 30 relates to regionally significant centres.	
S99 Genesis Energy Limited	S99.001	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	<p>REASONING: The purpose of RPS Change 1 is to reduce GHG emissions rapidly. It is already recognized that support is required to hasten the transition of the energy economy to renewable sources. Genesis considers the current passive policy wording of 'recognising' the benefits from renewable energy does not meet the purpose of RPS Change 1 and will not induce change from the status quo. More direct and active wording is required, and can be achieved by the use of the words to 'promote and enable' as set out in the decision sought column.</p> <p>In addition to promoting and enabling renewable energy development, Genesis considers the policy direction should also seek to protect the benefits derived from this infrastructure from reverse sensitive effects. Renewable energy development is dependent on the ability to locate where the resource is and the benefits from renewable energy is wide reaching and extends beyond the region boundaries. The protection of these benefits must be provided and is separate to the existing Policy 8 which seeks to protect regionally significant infrastructure.</p> <p>RELIEF SOUGHT: Amend Policy 7 as shown below.</p> <p>Policy 7: Recognising Promote, enable and protects the benefits from renewable energy and regionally significant infrastructure - regional and district plans.</p> <p>District and regional plans shall include policies and/or methods that recognise:</p> <p>(a) Promotes and enables the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including:</p> <p>(i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to low or zero carbon multi modal travel modes;</p> <p>(ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</p> <p>(iii) people have access to secure and affordable energy, maximising and preferably low or zero carbon energy sources, so as to meet their needs; and</p> <p>(iv) people have access to telecommunication services.</p> <p>(b) Promotes and enables the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</p> <p>(i) security of supply and diversification of our energy sources;</p> <p>(ii) reducing dependency on imported energy resources; and</p> <p>(iii) reducing greenhouse gas emissions. (c) Protects the social, economic, cultural and environmental benefits of renewable energy and regionally significant infrastructure from reverse sensitivity effects.</p> <p>Explanation</p>	Support	The use of more directive wording within the policy is supported.	Allow

S148 Wellington International Airport Ltd (WIAL)	S148.041	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	<p>REASONING: This policy is inappropriate in that it sets out limits and constraints as to when offsetting and compensation are available. These criteria are limiting and are written as a bottom line or hard limit. If they are not met the option of offsetting and/or compensation is no longer available to be used as part of any effects management response. These limits will likely foreclose offsetting and/or compensation even where it is likely to result in beneficial ecological or biodiversity outcomes in the region.</p> <p>The restrictions also depart from RMA section 104(1)(ab) which states that a consent authority "must" have regard to: "any measure proposed or agreed to by the applicant for the purpose of ensuring positive effects on the environment to offset or compensate for any adverse effects on the environment that will or may result from allowing the activity".</p> <p>Furthermore, RMA section 104(1)(b)(iii) requires that a consent authority "must" have regard to any relevant provisions of a National Policy Statement. While not yet operative, the draft NPSIB provides some direction about when consideration of biodiversity offsetting should be precluded from consideration - being circumstances when:</p> <p>(i) Residual adverse effects cannot be offset because of the irreplaceability or vulnerability of the indigenous biodiversity affected.</p> <p>(ii) There are no technically feasible or socially acceptable options by which to secure gains within acceptable timeframes.</p> <p>(iii) Effects on indigenous biodiversity are uncertain, unknown or little understood, but potential effects are significantly adverse.</p> <p>This is far more balanced and likely to give rise to good environmental outcomes through offsetting, while avoiding the loss of very important or irreplaceable biodiversity.</p> <p>RELIEF SOUGHT: Delete the proposed amendments to the policy including the limits associated with offsetting and compensation within this policy (a) - (d).</p>	Support	<p>In its original submission Transpower opposed proposed Policy 24 on the basis the provisions are overly broad in their application and potentially impractical to implement in practice. They do not recognise that some infrastructure has a functional or operational need to be constructed or operated in certain locations. In some situations this may mean that biodiversity offsetting or biodiversity compensation is required. Furthermore, Appendix 1A is very extensive in the ecosystems and specifies it applies to.</p> <p>On this basis the relief sought by the submitter is supported.</p>	Allow
S113 Wellington Water	S113.027	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	<p>REASONING: Not all activities can avoid high risk areas. For example, anywhere wet is considered high risk under the pNRP but many Wellington Water activities need to occur in wet locations.</p> <p>RELIEF SOUGHT: Amend clause (d) as follows:</p> <p>(d) include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme or to appropriately manage the risk for regionally significant infrastructure.</p>	Support	<p>Notwithstanding the clarification sought in its original submission, Transpower supports the recognition within the policy for regionally significant infrastructure.</p>	Allow
S137 Greater Wellington	S137.042	Policy 55: Providing for appropriate	<p>REASONING: Amendments are also required to align with the National Policy Statement for Highly Productive Land 2022. NPS-HPL Policy 2 requires that the identification and management of highly</p>	Oppose	<p>While Transpower does not oppose the intent of the policy addition to give effect to the NPS-HPL, it questions the</p>	Disallow

Regional Council (GWRC)		urban expansion - consideration	<p>productive land is undertaken in an integrated way, considering interactions with freshwater and urban development.</p> <p>RELIEF SOUGHT: Insert a new subclause (a)(ii)(9) to read:9. Protecting highly productive land for use in land-based primary production consistent with Policies 56 and 59; and</p>		appropriateness of giving effect to the NPS through Plan Change 1 as opposed to a comprehensive plan change that considers the entire context of the RPS and is accompanied by a s32 evaluation.	
S30 Porirua City Council	S30.062	Policy CC.14: Climate-resilient urban areas - consideration	<p>REASONING: Council opposes Policy CC.14 and seeks its deletion. Issues of concern include:</p> <ul style="list-style-type: none"> • It relies on a definition for "nature-based solution" which lacks the necessary specificity, certainty and clarity required for terms used in a RMA regulatory framework (see Council submission point on this definitions). • It relies on a number of terms that have not been defined. These include "climate-resilient urban area", "urban greening", "urban cooling", "water sensitive urban design", "resilience". The lack of definitions for these terms creates uncertainty for applicants, councils, and other stakeholders. • The policy includes requirements that will not be within the knowledge of the consent authority or applicants, for example suburb-scale tree canopy cover. • The policy would require councils to undertake assessments of tree cover regularly and assess applications against their impact of the current knowledge base, which may be altered by resident action, such as removing trees (either legally or illegally). This would be onerous on both council's and applicants. • The policy duplicates controls under other statutes and regulations such as the Building Code. • Relies on application of tests for which no policy guidance has been provided to determine when these are met. Examples include; "strengthen" in (d), "efficient" in (e), "withstand" in (f). • Clause (f) does not specify the timeline for "predicted" nor whose prediction is to be applied. The clause duplicates the Building Code. • No threshold is included and as drafted would apply to all resource consents, change, variation or review of RMA plans regardless of scale and type of activity. For example, a dormer window breaching a height in relation to boundary standard in a district plan may trigger this policy consideration. As such the policy will have a regulatory reach that has not been justified by the s32 evaluation. • In regard to (a), why are these targets not included in the relevant objective? Further, is there data available to assess this against? • In regard to (c), it is unclear what sort of targets are meant. This needs to be reframed to acknowledge can only address new development. What does "provide for actions and initiatives" mean in a consent process? This needs to be thought through into what this actually means in terms of implementation. How are we supposed to have regard to this? • In regard to (f), this is most appropriately handled under the building act and other acts determining the design resilience of different pieces of infrastructure (such as Electricity (Safety) Regulations 2010) and any amendments needed to capture the resilience of new buildings to predicted environmental changes. The Building Act already has requirements for different resilience elements (salt spray, wind zones etc.). These are regularly updated. Similarly there are engineering standards for a wide range of infrastructure to ensure that it is resilient. Assessment 	Support	<p>Transpower agrees with the reasoning provided by the submitter as to the practical concerns and issues with the policy as proposed.</p> <p>Specific to the National Grid, it is inappropriate to create green spaces underneath the National Grid lines on the basis vegetation can pose health and safety issues as well as pose an operational risk to the National Grid. The policy as proposed does not clearly articulate the outcomes sought and how they are to be achieved and as drafted, clause (a) and (d) would apply to a resource consent application associated with the National Grid.</p>	Allow

			<p>of applications may not be the most effective way of implementing resilience in that area. GWRC also need to consider how the canopy cover policy aligns with the restrictions under s76(4A), whereby territorial authorities cannot include rules in their plans that prohibit or restrict the felling, trimming, damaging or removal of a tree or trees on a single urban environment allotment, unless the tree(s) are described in a schedule in the district plan, which includes a description of the tree(s) and the specific street address or legal description. While territorial authorities may be able to include rules requiring canopy cover for new development, they are unable to then prevent the removal of those trees, without complying with the requirements of s76 RMA.</p> <p>RELIEF SOUGHT: Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives.</p>			
S100 Meridian Energy Limited	S100.018	<p>Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration</p>	<p>REASONING: Many of the proposed amendments set out in proposed RPS Change #1 seek to hasten the transition from an economy that is dependent on fossil fuels and generates greenhouse gas emissions. Proposed RPS Change #1 focuses on reducing fossil fuel dependence and reducing greenhouse gas emissions but is silent on how the fossil fuel is to be replaced in the transition towards a low emissions economy reliant on renewable energy. The result is a suite of policies that only address part of the issue. This shortcoming could be overcome (in part) by including policy support for the use and development of renewable energy which generating Policy 39 is an opportunity to complement the other proposed amendments to the RPS and genuinely facilitate the transition to a low emissions economy reliant on renewable energy.</p> <p>RELIEF SOUGHT: Amend Policy 39 and the accompanying explanation to support use and development of renewable energy to assist the transition from fossil fuel dependence towards a low emission economy based on renewable energy as follows (or similar to achieve a similar outcome):</p> <p>"Policy 39: Recognising Promoting and enabling the benefits from renewable energy and regionally significant infrastructure - consideration</p> <p>When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:</p> <p>(a) promoting and enabling the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it these contributes to reducing dependence on fossil fuels and potential greenhouse gas emissions; and</p> <p>(b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and</p> <p>(c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and</p> <p>(d) significant wind, solar and marine renewable energy resources within the region.</p> <p>Explanation</p>	Support	The use of more directive wording within the policy is supported.	Allow

			<p>Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions. The benefits of energy generated from renewable energy resources include:</p> <ul style="list-style-type: none"> • Security of and the diversification of New Zealand's energy sources • Reducing dependency on fossil fuels and imported energy resources - such as oil, natural gas and coal • Contributing to the transition to a low emissions economy • Reducing greenhouse gas emissions <p>The benefits are not only generated by large scale renewable energy projects but also smaller scale, distributed generation projects. The benefits of regionally significant infrastructure include:</p> <ul style="list-style-type: none"> • People and goods can efficiently and safely move around the region, and to and from • Public health and safety is maintained through the provision of essential services - such as potable water and the collection and transfer of sewage or stormwater • People have access to energy to meet their needs • People have access to telecommunication services <p>Energy generation from renewable energy and regionally significant infrastructure (as defined in Appendix 3) can provide benefits both within and outside the region. Renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community but also have functional and operational needs that constrain their location options. Typically, large renewable energy generation and regionally significant infrastructure facilities, by their very nature, cannot be established without causing some level of environmental effects. Consideration of local and regional benefits, functional and operational need and adverse effects need to be considered on a case by case basis to determine what is appropriate in any particular circumstances.</p>			
S137 Greater Wellington Regional Council (GWRC)	S137.042	Policy 55: Providing for appropriate urban expansion - consideration	<p>REASONING: Amendments are also required to align with the National Policy Statement for Highly Productive Land 2022. NPS-HPL Policy 2 requires that the identification and management of highly productive land is undertaken in an integrated way, considering interactions with freshwater and urban development.</p> <p>RELIEF SOUGHT: Insert a new subclause (a)(ii)(9) to read: 9. Protecting highly productive land for use in land-based primary production consistent with Policies 56 and 59; and</p>	Oppose	While Transpower does not oppose the intent of the policy addition to give effect to the NPS-HPL, it questions the appropriateness of giving effect to the NPS through Plan Change 1 as opposed to a comprehensive plan change that considers the entire context of the RPS and is accompanied by a s32 evaluation.	Disallow
S148 Wellington International Airport Ltd (WIAL)	S148.051	Policy 55: Providing for appropriate urban expansion - consideration	<p>REASONING: WIAL submits that in considering urban development particular regard should also be had to whether it is compatible with and does not adversely affect or constrain the ability to operate existing regionally significant infrastructure.</p> <p>RELIEF SOUGHT: Amend the policy to include (or with similar effect): avoids adverse reverse sensitivity effects on the operation and safety of regionally significant infrastructure.</p>	Support	Notwithstanding the clarification sought in its original submission, Transpower supports the recognition within the policy for regionally significant infrastructure.	Allow

FURTHER SUBMISSIONS BY POWERCO LIMITED ON SUBMISSIONS TO PROPOSED CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION

To: Greater Wellington Regional Council
Environmental Policy
PO Box 11646, Manners St
Wellington 6142
ATT: Hearings Adviser

Via email: regionalplan@gw.govt.nz

Name of submitter: Powerco Limited
Private Bag 2061
New Plymouth 4340
(Note that this is not the address for service.)

1. Powerco Limited's (**Powerco**) further submissions on submissions to Proposed Change 1 to the Regional Policy Statement for the Wellington Region are as contained in the attached table.
2. Powerco is a network utility operator with gas and electricity distribution networks across the Greater Wellington Region. Powerco has a particular interest in ensuring that the Regional Policy Statement enables the continued and efficient operation and development of this regionally significant network utility infrastructure, and therefore has an interest in the proposal that is greater than the general public.
3. Powerco wishes to be heard in support of its further submission.
4. If others make a similar submission, Powerco would be prepared to consider presenting a joint case at any hearing.

Signature of person authorised to sign on behalf of Powerco Limited:



Gary Scholfield
Environmental Planner

POWERCO

Dated at Tauranga this 19th day of December 2022.



Address for Service: Powerco Limited
PO Box 13 075
Tauranga 3141
Attention: Gary Scholfield

Phone: (07) 928 5659
Email: planning@powerco.co.nz

Powerco Further Submissions on Proposed Change 1 to the Regional Policy Statement for the Wellington Region

Submitter name / number:	Sub number:	RPS Change 1 Provision	Support or Oppose	Reasons:	Decision sought:
S32 Director-General of Conservation	S32.014	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	Powerco agrees that until target attribute states are set there is uncertainty around the implications of the policy. However, any return to the operative version of Policy 15 would need to include reinstatement of those parts of the Explanation that clarify how the term 'minimise' is to be interpreted in this context. Specifically, that minimisation involves reduction of effects to the extent reasonably achievable and that effects cannot always be completely avoided. Any interpretation of the term 'minimise' that required effects to be reduced to the smallest amount possible without enabling consideration of the practicality of doing so in the context of the activity and receiving environment would be opposed.	Allow the submission only if the explanatory text relating to the term 'minimise' is reinstated along with the operative version, or components of the operative version of Policy 15.
S32 Director-General of Conservation	S32.020	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Oppose	The changes sought introduce a requirement to avoid all subdivision, use and development that results in any increase in risk and are more onerous than NZCPS Policy 25. The proposed change does not recognise that some activities, such as gas and electricity networks will not be able to entirely avoid locating in areas subject to natural hazard risk and can be designed and operated in a manner that ensures they are resilient to the risk.	Disallow the submission and do not include the new subclause sought in Policy 29.
S32 Director-General of Conservation	S32.023	Policy 41: Controlling the effects of earthworks and vegetation disturbance	Support in part	Powerco agrees that until target attribute states are set there is uncertainty around the implications of the policy. However, any return to the operative version of Policy 41 would need to include reinstatement of those parts of the Explanation that clarify how the term 'minimise' is to be interpreted in this context. Specifically, that minimisation involves reduction of effects to the extent reasonably achievable and that effects cannot always be completely avoided. Any interpretation of the term 'minimise' that required effects to be reduced to the smallest amount possible without enabling consideration of the practicality of doing so in the context of the activity and receiving environment would be opposed.	Allow the submission only if the explanatory text relating to the term 'minimise' is reinstated along with the operative version, or components of the operative version of Policy 41.
S99 Genesis Energy Limited	S99.001	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans	Support	Agree that the social, economic, cultural & environmental benefits of renewable energy and regionally significant infrastructure should be protected from reverse sensitivity effects.	Allow the submission and include an additional clause in Policy 7 relating to the protection of renewable energy and regionally significant infrastructure from reverse sensitivity effects.
S137 Greater Wellington Regional Council	S137.062	General comments - definitions	Support	Introduction of a definition for 'minimise' would be useful in order to avoid an interpretation of the term that requires reduction of effects to the smallest possible amount. While it may be possible to reduce certain effects to the smallest possible amount, it may not always be practicable to do so in the context of the specific activity proposed, its location, any benefits associated with the activity or any functional and operational constraints.	Allow the submission and introduce the proposed definition for 'minimise', as follows: <i><u>Minimise: Reduce to the smallest amount reasonably practicable.</u></i> <i><u>Minimised, minimising and minimisation have the corresponding meaning.</u></i>
S115 Hutt City Council	S115.013	Objective 12	Support	Support the intent of the submission to amend Objective 12 to give effect to the NPS-FW in the regional context, rather than simply repeating the higher order direction, subject to review of any amended wording.	Allow the submission and amend Objective 12 as sought. Powerco seeks to be involved in the development of any amendments.

S115 Hutt City Council	S115.014 to S115.019	Indigenous ecosystems - Introductory text - Objective 16 - Objective 16B - Objective 16C - Objective 16A -	Support	Agree with concern raised that the appropriateness of the Change 1 provisions relating to indigenous biodiversity is uncertain, until such time as the NPS-IB is gazetted, and that the existing Operative RPS provisions should be retained. Any change to provisions relating to indigenous biodiversity should be made only after gazettal of the NPS-IB.	Allow the submission and delete all new provisions and amendments to existing provisions relating to indigenous biodiversity and retain existing Operative RPS provisions.
S115 Hutt City Council	S115.031	Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature based solutions to climate change - district and regional plans	Support	Powerco expressed concern in its own submission around the Policy CC.7 requirements to deliver 'nature based solutions' and the need to enable continued use of existing traditional infrastructure types. Deletion of the policy in its entirety is supported.	Allow the submission and delete Policy CC.7 in its entirety.
S115 Hutt City Council	S115.037	Policy 12: Management of water bodies -regional plans	Support	Support the intent of the submission to amend Policy 12 to give effect to the NPS-FW in the regional context, rather than simply repeating the higher order direction, subject to review of any amended wording.	Allow the submission and amend Policy 12 as sought. Powerco seeks to be involved in the development of any amendments.
S115 Hutt City Council	S115.047 to S115.049	Indigenous ecosystems - Policy 23 - Policy 24 - Policy IE.1	Support	Agree that provisions relating to indigenous biodiversity should only be reviewed once the NPS-IB is gazetted, or as a minimum, the timeframes should be amended to align with those set out in the most recent draft of the NPS-IB.	Allow the submission and delete all new provisions and amendments to existing provisions relating to indigenous biodiversity and retain existing Operative RPS provisions.
S115 Hutt City Council	S115.0122	Definitions – nature based solutions	Support	Agree with S115 that the definition of nature based solutions is not clear enough to provide direction to plan users.	Allow the submission and amend the definition to provide clarity about what is covered by the term.
S113 Wellington Water	S113.027	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards - district and regional plans	Support	Agree with S113 that not all activities can avoid high risk areas.	Allow the submission and amend Policy 29 to provide for the appropriate management of risk to regionally significant infrastructure, in addition to the changes sought in Powerco's own submission.
S158 Kāinga Ora	S158.037	Objective 22	Support	Agree with the submitter that many of the sub-points within the objective are unnecessary and create the potential for confusion given these issues are addressed in separate, more comprehensive chapters.	Allow the submission and amend Objective 22 as sought.
S158 Kāinga Ora	S158.045	General comments - climate change	Support	The intent of the submission to re-write some of the objectives, policies and methods relating to climate change to be more directive and to avoid ambiguity to District Councils and Plan users is supported.	Allow the submission. Powerco seeks to be involved in the development of any amendments.
S158 Kāinga Ora	S158.046	General comments – overall	Support	Powerco agrees PC1 needs to be amended to align with and ensure it does not go beyond what is required under the NPS-FM (including the 8 Dec 22 amendments) and the NPS-IB (once gazetted).	Allow the submission. Powerco seeks to be involved in the development of any amendments.

S148 Wellington International Airport Ltd (WIAL)	S148.051	Policy 55: Providing for appropriate urban expansion - consideration	Support	Powerco supports the amendment sought to Policy 55 to ensure particular regard is had to whether urban development is compatible with and does not adversely affect or constrain the ability to operate existing regionally significant infrastructure.	Allow the submission and amend Policy 55 as sought by WIAL.
S124 KiwiRail Holdings Limited	S124.012	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support	Agree that significant development capacity needs to be managed to ensure that any effects at the interface of conflicting land uses, including reverse sensitivity effects, are appropriately managed.	Allow the submission and amend Policy UD.3 as sought, to require minimisation of land use conflicts and avoidance of reverse sensitivity effects.
S100 Meridian Energy Limited	S100.002	Overarching Objective A	Support	Powerco agrees that the RPS should provide clear guidance on the importance of maintaining, upgrading and adapting or relocating regionally significant infrastructure where this is necessary to support community resilience.	Allow the submission and amend Objective A as sought by Meridian.
S100 Meridian Energy Limited	S100.004	Chapter 3.1A: Climate change Objective CC.1	Support	Powerco agrees that Objective CC.1 should apply to all types and scales of infrastructure including local infrastructure and regionally significant infrastructure.	Allow the submission and amend Objective CC.1 as sought by Meridian.
S100 Meridian Energy Limited	S100.014	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure	Support in part / oppose in part	Powerco agrees that the benefits of all infrastructure are relevant not just 'low and zero carbon regionally significant infrastructure'. Also, that the expression 'low and zero carbon regionally significant infrastructure' is uncertain as it is not defined in the RPS, and that additional text in the explanation would be useful. However, the wording suggested, particularly in clause (a)(ii) does not recognise the role that existing carbon-based RSI will continue to play in providing a diversity of energy sources, at least during a transition to low carbon energy provision.	Allow the submission in part and amend Policy 7 to ensure the benefits of all regionally significant infrastructure are recognised. Powerco seeks to be involved in any redrafting of Policy 7.
S127 Neo Leaf Global	S127.006	General comments	Support	Powerco agrees there is uncertainty around what end state will be expected to be achieved where the terms 'restore' and 'restoration' are used.	Allow the submission and replace "restore" and "restoration" with "enhancement" and "improvement" throughout the document.
S162 Winstone Aggregates	S162.032	Definitions: Restoration	Support	Agree that the basis for the definition of 'restoration' is unclear and potential pre-empts the NPS-IB.	Allow the submission and amend the definition of restoration as sought.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.0144	Definitions: New definition for 'stationary energy'	Support in part	Agree that a definition of the term 'stationary energy' would add clarity.	Allow the submission and include a definition of 'stationary energy'. Powerco seek to be involved in the drafting of any such definition.
S30 Porirua City Council	S30.034	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans	Support in part	While Powerco's submission on this policy seeks deletion of the reference to 'low and zero carbon regionally significant infrastructure', if the reference is retained, Powerco agrees the term should be defined for clarity and certainty.	If reference to 'low and zero carbon regionally significant infrastructure' is retained, allow the submission and define the term for clarity and certainty. Powerco seek to be involved in the drafting of any such definition.

S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.070	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	Powerco does not support the 'avoidance' approach proposed by Forest & Bird, and notes the wording proposed is more restrictive than the NZCPS.	Disallow the submission and do not make the amendments sought.
S10 Transpower New Zealand Limited	S10.002	Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values - district and regional plans	Support	Agree there is a need to recognise that some infrastructure has a functional or operational need to be constructed or operated in certain locations.	Allow submission and amend Policy 24 to recognise that regionally significant infrastructure may have a functional or operational need to locate in a particular location.
S129 Waka Kotahi	S129.018	Policy CC.9: Promoting greenhouse gas emission reduction and uptake of low emission fuels - Regional Land Transport Plan	Support	Powerco agrees that further clarification is needed with regard to how the RPS will direct a shift to greenhouse gas reduction and low emission fuels.	Allow the submission and amend Policy CC.9 as sought.
S113 Wellington Water	S113.002	Overarching Objective A	Support	Powerco agrees with the concerns raised by Wellington Water around the drafting of Objective A, in particular that it fails to provide for regionally significant infrastructure, for the characteristics & qualities of well-functioning urban environments and has some unclear drafting.	Allow the submission and amend Objective A as sought.
S140 Wellington City Council	S140.074	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	Powerco agree that as currently wording, Policy 51 is overly restrictive for certain uses and development in area of high to extreme natural hazard risk and support the alternative wording suggested.	Allow the submission and amend Policy 52 as sought.
S49 Chorus New Zealand Limited, Spark New Zealand Trading Ltd, Vodafone, New Zealand Ltd	S49.001	Regional form, design and function introductory text	Support	Powerco agrees the existing infrastructure examples provided are too limited and should align with the RPS definition of Regionally Significant Infrastructure.	Allow the submission and amend the introductory text to Chapter 3.9 Regional form, design and function to provide broader recognition of all RSI including gas and electricity distribution networks.

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

Who can make a Further Submission:

A further submission may only be made by a person who:

- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

- Online using our submission portal *Spoken*, at: <https://tinyurl.com/gwrc-rps-change-furthersubs>
- Email your Further Submission and this completed form to: regionalplan@gw.govt.nz
- Post your Further submission and this completed form to: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser. **N.B. Due to delays in postal services and the timeframe for making Further Submissions we highly recommend that an electronic copy of your Further Submission is provided by the closing date OR delivered to one of our offices.**
- Drop your Further Submission and this completed form to reception at one of Greater Wellington's offices.

(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter	
Name (First and Last) OR Organisation / Company: Peka Peka Farm Limited _____	
Address for Service (Email OR Postal Address): mitch@bbplanning.co.nz _____ Phone: _____ Optional	
Contact name and postal address for service of person making submission: Mitch Lewandowski, Building Block Planning Ltd, 8A Travancore Street, Island Bay, Wellington (If different from above)	
Only certain people may make further submissions Please tick the option that applies to you:	
<input type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input checked="" type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input type="checkbox"/>	I am the local authority for the relevant area.
Specify below the grounds for stating that you are within the category you have ticked: <u>Peka Peka Farm Ltd is a landowner that will be affected by the content of submissions to which this further submission relates.</u>	

2. Appearance at hearing Please select from the following:

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
<input checked="" type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearing


3. For the further submitter to action

Service of your further submission:

Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**

Each submitter has an address for service available at: <https://www.gw.govt.nz/rps-pc-1-submissions>

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature:  _____ Date: 19 December 2022 _____

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

All Further Submissions (including name and address for service) are made publicly available on our website. Your name and address for service will be used for correspondence during the hearing process. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

Please enter further submission points in the table on the following pages

4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

Submitter name or, Submitter number of the submission you are commenting on:	Submission point number: <i>Identified in the summary of decisions requested table</i>	Stance on the submission point: (Support, Oppose, Support in part, or Oppose in part)	Reasons: <i>Why you support or oppose this point</i>	Decision sought: (Allow, Disallow, Allow in part, or Disallow in part) <i>Identify the whole or part(s) of the submission point that this is in reference to</i>
Kapiti Coast District Council	S16.077	Support	The submission point is consistent with the relief sought by Peka Peka Farm Ltd and is supported as it seeks to maintain the drafting of the objective at an appropriately high-level.	Allow
	S16.040	Oppose in part in relation to the submission on matter (d)	The submission seeks to reorganise the structure of the policy, including by deleting matter (d) and incorporating the intent of matter (d) into the introduction of the policy. By doing so, the submission requires consideration of out of sequence development or urban development opportunities not otherwise identified in a growth strategy, to be assessed for consistency with a growth strategy at point (b) of the policy as suggested by the submission. This is inconsistent both internally within the policy and with the NPS-UD.	Disallow in part
	S16.082	Support	The submission rightly identifies that other appropriate urban zones may be applicable and should not be restricted.	Allow
Kainga Ora Homes and Communities	S158.029	Oppose in part	The inclusion of matter (a) is opposed as it is unclear how the prioritisation of intensification can be meaningfully achieved or measured.	Disallow
Porirua City Council	Whole submission	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported	Allow

			without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	
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Add further pages as required

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

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- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

- Online using our submission portal *Spoken*, at: <https://tinyurl.com/gwrc-rps-change-furthersubs>
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- Post your Further submission and this completed form to: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser. **N.B. Due to delays in postal services and the timeframe for making Further Submissions we highly recommend that an electronic copy of your Further Submission is provided by the closing date OR delivered to one of our offices.**
- Drop your Further Submission and this completed form to reception at one of Greater Wellington’s offices.

(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter	
Name (First and Last) OR Organisation / Company: <u>MERIDIAN ENERGY LIMITED</u>	
Address for Service (Email OR Postal Address): <u>P O BOX 2146, CHRISTCHURCH 8140</u> Phone: <u>021 898 143</u>	
Contact name and postal address for service of person making submission: <u>Andrew Feierabend</u>	
(If different from above)	
Only certain people may make further submissions Please tick the option that applies to you:	
<input type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input checked="" type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input type="checkbox"/>	I am the local authority for the relevant area.
Specify below the grounds for stating that you are within the category you have ticked:	
<u>Meridian Energy Limited operates renewable electricity generation assets in the Wellington Region and its activities will be directly affected by the amendments proposed by RPS Change 1.</u>	

2. Appearance at hearing Please select from the following:

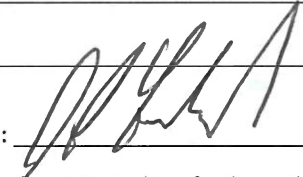
<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
<input checked="" type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearing

3. For the further submitter to action

Service of your further submission:
Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**

Each submitter has an address for service available at: <https://www.gw.govt.nz/rps-pc-1-submissions>

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: 	Date: <u>16 December 2022</u>
Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.	

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

All Further Submissions (including name and address for service) are made publicly available on our website. Your name and address for service will be used for correspondence during the hearing process. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

Please enter further submission points in the table on the following pages

4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

Submitter name or, Submitter number of the submission you are commenting on:	Submission point number: <i>Identified in the summary of decisions requested table</i>	Stance on the submission point: <i>(Support, Oppose, Support in part, or Oppose in part)</i>	Reasons: <i>Why you support or oppose this point</i>	Decision sought: <i>(Allow, Disallow, Allow in part, or Disallow in part)</i> <i>Identify the whole or part(s) of the submission point that this is in reference to</i>

Add further pages as required

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Chapter 3 Introduction					
Statement of Issues					
	Wellington Water Limited	S113.001	Support in part	<p>WWL seeks insertion of an additional issue highlighting the vulnerability of infrastructure:</p> <p><u>4. The region's environment, communities and infrastructure are vulnerable to future national and global challenges associated with climate change. Climate change is expected to exacerbate flood hazard, including coastal inundation, and drought conditions. The effects of climate change, including coastal and river flood inundation and erosion, are expected to damage or impair the operation of infrastructure (including regionally significant infrastructure). Community resilience to the effects of climate change will depend on the functionality, integrity and adaptability of infrastructure. Regionally significant infrastructure will need to be upgraded and adapted or relocated to maintain the necessary functionality and capacity to support community resilience.</u></p> <p>Meridian agrees that maintaining the functionality, integrity and adaptability of infrastructure including regionally significant infrastructure is essential in supporting communities' resilience against the effects of climate change.</p>	Allow to the extent any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Chapter 3 Introduction					
Objective A	Wellington Water Limited	S113.002	Support in part	<p>WWL seeks amendment to overcome non-provision for the characteristics and qualities of well-functioning urban environments and regionally significant infrastructure, unclear drafting, and absence of guidance on how to give effect to Te Mana o te Wai.</p> <p>Meridian agrees the objective does not provide clear guidance and needs to be re-written.</p>	Allow to the extent any amendments are consistent with Meridian's own requested relief.
Objective A	Ātiawa Whakarongotai Charitable Trust ki	S131.013	Support in part	<p>The submitter seeks insertion of (p. 6) an additional clause (aa) <i>'support the connection between mana whenua and te taiao'</i>. Also seeks insertion of words <i>'...guided by Te Ao Māori and māātauranga Māori'</i>.</p> <p>The proposed wording (or similar wording) may address the issue that Meridian has itself raised with Objective A.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Objective A	Powerco Limited	S134.001	Support in part	<p>Powerco requests amendment to clearly provide for the characteristics and qualities of well-functioning urban environments and to provide for regionally significant infrastructure.</p> <p>Meridian agrees that the objective needs amendment to provide for regionally significant infrastructure.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Objective A	Wellington International Airport Ltd	S148.013	Support in part	<p>WIAL considers that the expression 'Te Ao Māori' is not defined for the purposes of Objective A and it is not clear what guidance it will provide</p>	Allow to the extent any amendments are consistent

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				(or require). WIAL requests a definition for the expression or provision of sufficient methodologies to support the intent of this objective or deletion of the objective.	with Meridian's own requested relief.
Chapter 3.1A Introduction					
Objective CC.3	Harmony Energy NZ #2 Limited	S70.001	Support in part	<p>Harmony Energy NZ is concerned that the RPS Change does not require plans to promote and enable new generation except for very small scale development. The submitter also notes the absence of prescriptive rules is a gap that does not adequately reflect intentions signaled by other parts of RPS Change 1.</p> <p>Meridian agrees that insufficient support and direction is included in the RPS for large scale renewable electricity generation that is expected to be a necessary component of assisting the transition from fossil fuels to an economy fuelled by renewable energy. Meridian understands that the RPS cannot include rules but can include directive policies that direct the scope of provisions, including rules, in district plans.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Objective CC.6	Wellington International Airport Limited	S148.019	Support	<p>WIAL considers it is not only the resilience of communities and the natural environment that need strengthened resilience against the adverse effects of climate change. Infrastructure, including regionally significant infrastructure can be particularly vulnerable to climate change effects and represents a considerable financial investment that is critical to the resilience of communities. It warrants explicit mention in Objective CC.6. WIAL requests amendment of the objective as follows:</p> <p><i>Resource management and adaptation planning increase the resilience of communities, infrastructure (including regionally</i></p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				<p><i>significant infrastructure) and the natural environment to the short, medium, and long-term effects of climate change.</i></p> <p>Meridian agrees that the regionally significant infrastructure is essential to support the resilience of communities and this needs to be addressed in the objective.</p>	
Objective CC.6	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.006	Support	<p>The Fuel Companies (p. 5) request inclusion of reference to infrastructure (including RSI).</p> <p>Meridian agrees the objective needs amendment to better provide for regionally significant infrastructure.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Objective CC.6	Powerco Limited	S134.002	Support	<p>Powerco requests amendment to acknowledge the need for increased resilience of infrastructure, including regionally significant infrastructure, against the adverse effects of climate change. This could be achieved by making the following changes:</p> <p>Objective CC.6 Resource management and adaptation planning increase <i>the resilience of communities, <u>infrastructure (including regionally significant infrastructure)</u> and the natural environment to the short, medium, and long-term effects of climate change.</i></p> <p>Meridian agrees that explicit reference to regionally significant infrastructure should be included in the objective.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Objective CC.7	Wellington International Airport Limited	S148.023	Support	<p>WIAL requests amendment to add the following qualifier: <u>...where it is practicable and appropriate to do so [for provide an appropriate qualifier for regionally significant infrastructure].</u> Otherwise delete the Policy.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				Meridian agrees that the amendment is necessary to avoid obstructing the efficient and effective operation of regionally significant infrastructure.	
Chapter 3.6 Indigenous Ecosystems					
Indigenous Ecosystems	Hutt City Council	S115.014	Support in part	<p>Hutt CC notes that, while indigenous biodiversity is a key issue, the government is to soon gazette a National Policy Statement on Indigenous Biodiversity (“NPS-IB”). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems. HCC requests that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p> <p>Meridian agrees in principle that the RPS must be consistent with the NPS-IB once the NPS-IB is gazetted. Meridian considers it is premature to advance the scope of changes GWRC proposes to the RPS indigenous biodiversity provisions in the absence of settled guidance from a gazetted National Policy Statement, particularly where the proposed RPS changes relate to terrestrial indigenous biodiversity provisions beyond the scope of a freshwater planning instrument. Until settled NPS guidance is available, the indigenous biodiversity provisions in the proposed Natural Resources Plan (recently settled by Environment Court mediation) represent an appropriate approach.</p>	Allow to the extent that any amendments are consistent with Meridian’s own requested relief.

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Introduction	Wellington Water Limited	S113.006	Support in part	<p>WWL requests deletion of the indigenous biodiversity component or updating of the RPS to reflect the final gazetted version of the NPS-IB or to reflect the provisions for specified infrastructure and associated benefits as per exposure draft NPS-IB. WWL also considers the word 'protect' is a very strong term and will be unachievable in many locations.</p> <p>Meridian agrees that the RPS provisions must reflect and be consistent with the NPS-IB. Meridian considers it is premature to advance the scope of changes GWRC proposes to the RPS indigenous biodiversity provisions in the absence of settled guidance from a gazetted National Policy Statement, particularly where the proposed RPS changes relate to terrestrial indigenous biodiversity provisions beyond the scope of a freshwater planning instrument. If GWRC's proposed RPS provisions do not give effect to the future NPS-IB, the RPS will need to be amended in any event. Until settled NPS guidance is available, Meridian prefers the amendments requested in its own submission which reflect the provisions in the proposed Natural Resources Plan (recently settled by Environment Court mediation).</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Objective 16	South Wairarapa District Council	S79.009	Support in part	<p>SWDC requested amendment to: '<i>Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are protected, and <u>over time enhanced</u>, and restored to a healthy functioning state.</i>'</p> <p>Meridian agrees that the objective should acknowledge the time it will take to effect enhancement and restoration but considers the requirement for enhancement and restoration in all cases is inappropriate (consistent with its own submission</p>	Amend the requested relief by inserting 'or' as follows: ' <i>...biodiversity values are protected, and <u>where appropriate are over-time enhanced or and restored over time to a healthy functioning state</u>; and otherwise allow to the extent that any amendments are consistent</i>

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				on this objective). Meridian considers the text should allow enhancement 'or' restoration as appropriate.	with Meridian's own requested relief.
Objective 16	Waka Kotahi NZTA	S129.021	Oppose in part	<p>Waka Kotahi (page 11) generally supports the objective but considers 'protected' is too strong and seeks amendment: <i>'Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are <u>maintained</u> protected, enhanced, and restored to a healthy functioning state.'</i></p> <p>The requested amendment retains the reference to 'enhancement' which conflicts with amendments Meridian has requested to Objective 16.</p>	Disallow
Objective 16	Powerco Limited	S134.003	Support	<p>Powerco requests amendment to recognise that enhancement and restoration of indigenous ecosystems and habitats may not be appropriate in all circumstances. This could be achieved by making changes along the following lines: <i>'Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are <u>maintained</u> protected and, where appropriate, enhanced, and <u>or</u> restored to a healthy functioning state.'</i></p> <p>The requested amendment is similar to Meridian's requested amendment to Objective 16.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Objective 16				<p>WIAL acknowledges that this objective is generally consistent with section 6 of the RMA relating to indigenous biodiversity outcomes. However when coupled with the ensuing policies and offsetting and compensation limitations, WIAL is concerned that this suite of provisions could significantly impact on infrastructure projects, including those which may be necessary to protect existing infrastructure assets such as maintenance of the seawall surrounding the airport. It may not always be able to enhance and restore existing ecosystems which may be affected by a development or project, however with appropriate offsetting or compensation overall ecosystem health could be improved and protected. Seeks amendment as follows:</p> <p><i><u>'Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are protected, enhanced, and restored where appropriate and in accordance with an effects management hierarchy in order to achieve an overall healthy functioning state.'</u></i></p> <p>Meridian supports the reference to an effects management hierarchy, in addition to the amendment to protect and, where appropriate, enhance and restore (consistent with Meridian's own submission).</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Objective 16	Dairy NZ	S136.006	Support in part	<p>Dairy NZ considers that the proposed wording goes beyond that required under S6 of the and seeks amendment as follows (or words to similar effect):</p> <p><i>'<u>Significant</u> Indigenous ecosystems and habitats with significant ecosystem and/or biodiversity values are <u>maintained</u> protected, enhanced, and restored to a healthy functioning state.'</i></p> <p>Meridian agrees that the focus of the RPS should be on significant (not all) indigenous ecosystems and habitats.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Objective 16A	Powerco Limited	S134.004	Support	<p>Powerco seeks amendment of Objective 16A to recognise that enhancement and restoration of indigenous ecosystems and habitats may not be appropriate in all circumstances. This could be achieved by making changes along the following lines:</p> <p><i>'The region's indigenous ecosystems are maintained <u>and, where appropriate, enhanced, and or</u> restored to a healthy functioning state., improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakoko.'</i></p> <p>Meridian agrees that enhancement or restoration should be required where appropriate (for example, where values are degraded) and not in all situations.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Objective 16A	South Wairarapa District Council	S79 not numbered individually	Oppose in part	<p>SWDC requested the same relief as for Objective 16: Retain as notified if relief is granted as requested for Objective 16, or amend as follows: <i>'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;'</i></p> <p>Meridian agrees the objective should acknowledge the time it will take to effect enhancement and restoration but, consistent with its own submission on Objective 16A, does not require enhancement or restoration should be required in all cases. The objective should require enhancement or restoration where appropriate.</p>	Amend the requested relief to include reference to restoration 'over time' but otherwise match the relief requested in Meridian's submission (require enhancement and restoration where appropriate, not in all cases).
Objective 16A	Forest and Bird	S165.021	Oppose	<p>Forest & Bird question how non-regulatory policies, particularly Policy IE.3, and methods are going to achieve the objective and suggest additional regulatory policy is required, but have not proposed any alternative wording.</p> <p>Meridian opposes the request in the absence of any detailed wording suggestion.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Objective 16A	DairyNZ	S136.007	Support in part	<p>Dairy NZ requests that Objective 16A is deleted with the issue addressed through a full review of the RPS. Alternatively, amend Objective 16A as follows (or words to similar effect): <i>'The region's indigenous ecosystems are maintained, enhanced, and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.'</i></p> <p>Meridian opposes the requirement for enhancement and restoration in all situations (consistent with its own submission points on Objective 16A).</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Objective 16B	South Wairarapa District Council	S79.010	Support in part	<p>SWDC requests that, if the NPS Indigenous Biodiversity gets gazetted prior to further submissions closing, GWRC consider an appropriate process to align policy approaches.</p> <p>Meridian considers it is premature to advance the scope of changes GWRC proposes to the RPS indigenous biodiversity provisions in the absence of settled guidance from a gazetted National Policy Statement, particularly where the proposed RPS changes relate to terrestrial indigenous biodiversity provisions beyond the scope of a freshwater planning instrument. If GWRC's proposed RPS provisions do not give effect to the future NPS-IB, the RPS will need to be amended in any event. Until settled NPS guidance is available, Meridian prefers the amendments requested in its own submission which reflect the provisions in the proposed Natural Resources Plan (recently settled by Environment Court mediation).</p>	Allow to the extent of making the amendments requested in Meridian's submission in the interim until any further changes are made, by RPS change or variation, to accommodate the future gazetted NPS-IB.
Objective 16C	South Wairarapa District Council	S79.011	Support in part	<p>provisions beyond the scope of a freshwater planning instrument. If GWRC's proposed RPS provisions do not give effect to the future NPS-IB, the RPS will need to be amended in any event. Until settled NPS guidance is available, Meridian prefers the amendments requested in its own submission which reflect the provisions in the proposed Natural Resources Plan (recently settled by Environment Court mediation).</p>	Allow to the extent of making the amendments requested in Meridian's submission in the interim until any further changes are made, by RPS change or variation, to accommodate the future gazetted NPS-IB.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Chapter 4.1					
Policy CC.3	Forest & Bird	S165.036	Oppose	<p>Forest & Bird: seeks amendment: <i>'By 30 June 2025, district plans shall include objectives, policies, rules and methods that enables infrastructure that supports the uptake of zero and low-carbon multi modal transport that contribute to reducing reduce greenhouse gas emissions, <u>while protecting indigenous biodiversity.</u>'</i></p> <p>Meridian does not agree that all indigenous biodiversity warrants protection in all situations and notes that this is not required by section 6 of the Act. Policy CC.3 is an enabling policy and there are other objectives and policies that seek protection of indigenous biodiversity values. The Plan must be read as a whole.</p>	Disallow
Policy 7	Wellington Water Limited	S113.015	Support in part	<p>WWL considers it will be very difficult for infrastructure providers to achieve Te Mana o te Wai, support growth, manage biodiversity, provide resilience for climate change and manage natural hazard risks if appropriate planning pathways are not provided in District and Regional Plans. The reference to low or zero carbon infrastructure in clause (a) creates a third tier of infrastructure to the detriment of regionally significant infrastructure and should be deleted. Overall, the RPS needs to enable consideration of local and regional benefits, functional and operational need and adverse effects a case by case basis to determine what is appropriate in any particular circumstances. Requests detailed amendments to address this.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				Meridian agrees that Policy 7 needs to be amended to effectively enable the development and upgrading of regionally significant infrastructure necessary to support communities and provide resilience against climate change.	
Policy 7	Waka Kotahi NZTA	S129.017	Oppose	<p>Waka Kotahi (page 10) supports the policy and requests its retention as notified to enable adequate consideration of RSI.</p> <p>Meridian considers Policy 7 needs amendment for the reasons explained in its own submission.</p>	Disallow

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 7	Genesis Energy Limited	S99.001	Support	<p>Genesis (Table 1 Row 1) considers that more direct and active wording is required ('Recognising' is too passive) and requests amendment to:</p> <p>'Recognising-Promote, enable and protects the benefits from renewable energy and regionally significant infrastructure – regional and district plans District and regional plans shall include policies and/or methods that recognise:</p> <p>(a) <u>Promotes and enables</u> the social, economic, cultural and environmental benefits of regionally significant infrastructure</p> <p>...</p> <p>(iii) people have access to <u>secure and affordable</u> energy, <u>maximising</u> and <u>preferably low or zero carbon energy sources</u>, so as to meet their needs; and</p> <p>(iv) people have access to telecommunication services.</p> <p>(b) <u>Promotes and enables</u> the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:...</p> <p>(i) security of supply and diversification of our energy sources;</p> <p>(ii) reducing dependency on imported energy resources; and</p> <p>(iii) reducing greenhouse gas emissions.</p> <p>(c) <u>Protects the social, economic, cultural and environmental benefits of renewable energy and regionally significant infrastructure from reverse sensitivity effects.</u></p> <p>Meridian supports the suggested amendments, together with or in addition to the amendments proposed in its own submission.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 7	Forest and Bird	S165.043	Oppose	<p>Forest & Bird requests that the words 'low and zero carbon RSI' be replaced with '<i>RSI that contributes to the achievement of the greenhouse gas emission targets in Objective CC.1</i>'.</p> <p>Not all regionally significant infrastructure will contribute directly or tangibly to the achievement of greenhouse gas emission targets. The development and upgrading of renewable electricity generation assets will do, but other forms of regionally significant infrastructure will be essential for supporting community resilience (greenhouse gas emission reduction is not the sole objective of the RPS).</p>	Disallow
Policy 7	Powerco Limited	S134.	Support in part	<p>Powerco requests amendment as follows: <i>'Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans District and regional plans shall include policies and/or methods that recognise:</i> <i>(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including:</i> <i>(i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to low or zero carbon multi modal travel modes;</i> <i>(ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</i> <i>(iii) people have access to energy, and preferably including low or zero carbon energy, so as to meet their needs; and</i> <i>(iv) people have access to telecommunication services. ...'</i></p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				The requested amendments have merit, alongside the amendments requested in Meridian's own submission.	
Policy 11	CentrePort Limited	S83.001	Support	<p>Centreport: seeks clarification of why the policy is limited to small scale generation and electricity only and requests amendment to enable renewable electricity generation beyond 100 kW, to facilitate the transition to a low carbon economy.</p> <p>Meridian agrees that the policy is unduly limiting and there should be an enabling equivalent policy for large scale renewable electricity generation.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Policy 24	Greater Wellington Regional Council	S137.019	Oppose	<p>GWRC (p.4 of 9) has sought numerous amendments to 'improve readability and clarity'.</p> <p>Meridian does not agree that the requested amendments provide any greater readability or clarity. They potentially create further ambiguity.</p>	Disallow
Policy 24	Transpower New Zealand Limited	S10.002	Support	<p>Transpower opposes the proposed amendments because they are too broad and impractical and do not recognise that some infrastructure has a functional or operational need to be constructed or operated in certain locations. The submission notes that the Minister for the Environment has confirmed that infrastructure will be exempt from complying with limits where it cannot be situated anywhere else https://www.beehive.govt.nz/speech/how-future-resource-management-system-will-better-enable-development-outcomes:</p> <p>The submission seeks the following addition: <i>'This does not apply to nationally and regionally significant infrastructure that</i></p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 24	Hutt City Council	S115.048	Support in part	<p>Hutt CC requests deletion of the proposed amendments to Policy 24 and retention of the operative RPS Policy 24. Failing that, amendment of the deadline from 30.06.25 to 5 years after the RPS Change 1 becomes operative.</p> <p>As earlier noted, Meridian considers it is premature to advance the scope of amendments to RPS indigenous biodiversity provisions to the extent proposed by RPS Change 1, for terrestrial and aquatic indigenous biodiversity. Meridian agrees that the requested relief is a rational approach, pending gazettal of the NPS-IB.</p>	Allow as an alternative form of relief to the relief requested in Meridian's submission.
Policy 24	Powerco Limited	S134.011	Support	<p>Powerco requests that, pending the NPS Indigenous Biodiversity being gazetted, Policy 24 should be amended to ensure the requirements around offsetting are no more onerous than those set out in the Proposed Natural Resources Plan (PNRP), which sets an outcome of no net biodiversity loss. Also requests deletion of the requirement for +10% net biodiversity gain.</p> <p>Meridian supports the approach of the proposed Natural Resources plan and agrees that the requested relief is a rational approach, pending the NPS Indigenous Biodiversity gazetted. Meridian opposes the 10% net gain requirement.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 24	Rangitāne o Wairarapa	S168.073	Oppose	<p>Rangitane o Wairarapa requests amendment of the policy to:</p> <ul style="list-style-type: none"> - Accurately reflect the role of offsetting and compensation as provided for by the Exposure Draft of the NPS IB; and - be consistent with and give effect to the NPS IB (on the presumption this is expected to be gazetted before the plan change hearings commence, and on the basis the wording of the NPS is unlikely to change), particularly with respect to the limits to offsetting and compensation. <p>Meridian considers it is premature changes based on an exposure draft of the NPS Indigenous Biodiversity. If GWRC's proposed RPS provisions do not give effect to the future NPS-IB, the RPS will need to be amended in any event.</p>	Disallow
Policy 24	Taranaki Whānui	S167.	Oppose in part	<p>Taranaki Whānui are concerned that adding a pathway for biodiversity offsetting and compensation will inherently create a pathway for further adverse impacts.</p> <p>Biodiversity offsetting and compensation have been endorsed as legitimate approaches in numerous Environment Court decisions and in the recently settled proposed Natural Resources Plan.</p>	Disallow any deletion of biodiversity offsetting and compensation as options in the RPS effects management hierarchy.
Policy 24	Upper Hutt CC	S34.075	Support	Upper Hutt CC fundamentally disagrees with going ahead in advance of the NPS-IB being gazetted and requests that the policy be reviewed the once NPS-IB has been gazetted.	Allow to the extent of making the amendments requested in Meridian's submission in the interim until any further changes are made, by RPS

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				Meridian considers it is premature to advance the scope of changes GWRC proposes to the RPS indigenous biodiversity provisions in the absence of settled guidance from a gazetted National Policy Statement, particularly where the proposed RPS changes relate to terrestrial indigenous biodiversity provisions beyond the scope of a freshwater planning instrument. If GWRC's proposed RPS provisions do not give effect to the future NPS-IB, the RPS will need to be amended in any event. Until settled NPS guidance is available, Meridian prefers the amendments requested in its own submission which reflect the provisions in the proposed Natural Resources Plan (recently settled by Environment Court mediation).	change or variation, to accommodate the future gazetted NPS-IB.
Policy 24	Te Tumu Paeroa Office of the Māori Trustee	S102.056	Oppose	Office of the Māori Trustee: considers that the following amendment needs to be made Policy 24: <i>'(a) not provide for biodiversity offsetting: (i) where it is not appropriate, there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset' ...</i> Meridian considers the proposed insertion creates ambiguity.	Disallow
Policy 24	Wellington International Airport Limited	S148.041	Support	WIAL requests deletion of the proposed amendments to the policy including the limits associated with offsetting and compensation within this policy (a) – (d). WIAL's request aligns with Meridian's own requested relief.	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Chapter 4.2					
Policy IM.2	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.016	Support	The Fuel Companies (p .8) seek the deletion of Policy IM.2 due to the significant uncertainty in the wording. Meridian agrees the wording creates uncertainty and does not provide clear guidance.	Allow.
Policy IM.2	Kāpiti Coast District Council	S16.030	Support	Kapiti Coast DC requests deletion of Policy IM.2. Meridian agrees the policy is not supported by any RMA provisions or higher order policy instruments and provides no clear policy guidance.	Allow.
Policy IM.2	Porirua City Council	S30.057	Support	Porirua CC requests deletion of Policy IM.2. Meridian agrees that the policy lacks the necessary precision to enable its meaningful implementation and introduces a requirement for Plans to address matters beyond their s. 30 and s. 31 RMA functions.	Allow
Policy IM.2	Powerco Limited	S134.013	Support	Powerco requests deletion of Policy IM.2/ Meridian agrees that Policy IM.2 is uncertain and incapable of consistent implementation.	Allow
Policy IM.2	Te Tumu Paeroa Office of the Māori Trustee	S.102.027	Oppose	The Office of the Māori Trustee considers that Policy IM.2 should be changed to a regulatory policy. Meridian disagrees. Policy IM.2 is incapable of consistent implementation, is ambiguous and does not give effect to a RMA function and should be deleted.	Disallow

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy IM.2	Wellington International Airport Limited	S148.014	Support	<p>WIAL requests the deletion of Policy IM.2. WIAL considers these to be laudable goals, however it is not clear how they will be applied in a statutory sense under the framework of the Resource Management Act or realistically achievable given the terminology used. For example "not exacerbating" is not something that is consistent with usual resource management practice and requirements.</p> <p>Meridian agrees: the policy is incapable of consistent implementation.</p>	Allow
Policy 39 (a)	Wellington Water Limited	S113.029	Support	<p>WWL considers that clause (a) creates a third tier of infrastructure to the detriment of RSI and seeks amendment: <i>(a) the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions; and ...</i></p> <p>Meridian agrees that the qualification in clause (a) unnecessarily constrains the consideration of all relevant potential benefits of regionally significant infrastructure.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Policy 39	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.017	Oppose in part	<p>The Fuel Companies (p. 8) consider that not all RSI is able to contribute to a reduction in greenhouse gases - therefore oppose (and seek deletion of) the words in clause (a) 'in particular where it contributes to reducing greenhouse gas emissions'.</p> <p>Meridian considers the text should be retained to the extent it is relevant for some forms of regionally significant infrastructure.</p>	Disallow

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 39	Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand Trading Limited	S49.004	Support	<p>Chorus, Spark, Vodafone (p. 6) consider that, similar to the amendments proposed to Policy 7, create a weighting which requires particular recognition of regionally significant infrastructure which contributes to reducing greenhouse gas emissions, above regionally significant infrastructure as defined in the RPS.</p> <p>Meridian agrees that the policy needs to ensure that the importance of regionally significant infrastructure is not minimised if it does not make a quantifiable contribution to the reduction of greenhouse gas emissions.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Policy 39	Transpower New Zealand Limited	S10.004	Support	<p>Transpower considers the Policy needs greater recognition of the need for transmission of energy and electricity generation (to give effect to the NPSET) and seeks amendment to (d): <u>'significant wind, solar and marine renewable energy resources within the region and the operation, maintenance, upgrade and development of the electricity transmission network to support the transmission of the renewable energy resource.'</u></p> <p>Meridian agrees that, given the essential role of the electricity transmission network in supporting community resilience and economic endeavour, the RPS should explicitly recognise the importance of its operation, maintenance, upgrading and development to meet future needs.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 39	Genesis Energy Limited	S99.003	Support	<p>Genesis (page 7): For the reasons explained in its submission point on Policy 7, Genesis seeks amendments mirroring those requested for Policy 7 (promoting, enabling and protecting the benefits from renewable electricity generation and regionally significant infrastructure).</p> <p>Meridian's submission has requested similar amendments.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Policy 39	Hutt City Council	S115.064	Support	<p>Hutt CC requests that Policy 39 be amended to clarify that the policy does not require renewable energy projects and regionally significant infrastructure projects to conduct a greenhouse gas assessment at resource consent stage, unless the applicant is relying on the beneficial environmental effects of greenhouse gas emissions reductions to justify the project.</p> <p>Meridian agrees the requested amendment is appropriate.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Policy 39	Forest and Bird	S165.068	Oppose	<p>Forest & Bird seeks amendment to link the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to <u>reduces</u> greenhouse gas emissions <u>in a way that achieves the targets in Objective CC.3.</u></p> <p>No single regionally significant infrastructure project will (itself alone) achieve the targets. The requested wording creates a policy that cannot be achieved on an individual application assessment.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 39	Kāpiti Coast District Council	S16.038	Oppose	<p>KCDC requests amendment of Policy 39 as follows: <i>'Recognising the benefits from renewable energy and regionally significant infrastructure – When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard consideration shall be given to: (a) ...'</i></p> <p>Meridian's view is that, consistent with section 7 of the Act and the NPS Renewable Electricity Generation, Policy 39 should require that more than just 'consideration' should be given to the benefits of regionally significant infrastructure including renewable electricity generation. The requested relief conflicts with the amendments requested in Meridian's submission.</p>	Disallow
Policy 39	Porirua City Council	S30.063	Oppose	<p>Porirua CC considers the policy needs to only address the benefits of renewable electricity generation or should be split into two parts. PCC also requests that the policy only apply to applications for resource consent.</p> <p>The requested amendments conflict with the relief Meridian has requested in its own submission (promoting and enabling renewable electricity throughout the region, to assist the transition from fossil fuel dependence to a low emissions economy reliant on renewable energy).</p>	Disallow
Policy 40	BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.018	Oppose in part	<p>The Fuel Companies (p. 9) request replacement of 'protecting' 'maintaining' and request retention of 'enhancing'.</p> <p>Meridian's own submission opposes enhancement in all situations and requests enhancement 'where appropriate'.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 40	Porirua City Council	S30.064	Support	<p>Porirua CC requests clarification that Policy 40 only applies to applications to GWRC that fall with GWRC's s. 30 RMA functions.</p> <p>Meridian agrees that the amendment is necessary to retain the stated scope of the policy.</p>	Allow
Policy 41	Ātiawa Whakarongotai Charitable Trust	S131.090	Oppose	<p>The submission (p. 23) seeks that all discharges to water bodies are avoided, regardless of whether suspended sediment limits are exceeded or not.</p> <p>Meridian considers that the proposed amendment creates an unachievable 'avoid' policy. The pre-existing 'minimise' approach remains appropriate.</p>	Disallow
Policy 41	Porirua City Council	S30.065	Support	<p>Porirua CC requests clarification that Policy 41 only applies to applications to GWRC that fall within GWRC's s. 30 RMA functions.</p> <p>Meridian agrees that the scope of the policy should be confined to s. 30 RMA functions.</p>	Allow
Policy 47	Forest and Bird	S165.074	Oppose	<p>Forest & Bird considers it is not appropriate to include new subclause (i), which refers to limits to offsetting and compensation, as a matter to be had particular regard to. And requests that 'had regard to' is changed to 'give effect to'.</p> <p>Meridian considers 'have regard to' is the correct approach. The policy is a 'consideration' policy.</p>	Disallow

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 47	Porirua City Council	S30 not individually numbered	Support in part	<p>Porirua CC seeks amendment to include a statement, deeming provision, or advice note to the effect that the policy shall cease to have effect once policies 23 and 24 are in place in an operative district or regional plan.</p> <p>Meridian expects that this will be the natural consequence of the policy being given effect in operative plan provisions, but sees no harm in such an advice note.</p>	Allow
Policy 47	Upper Hutt City Council	S34.078	Support in part	<p>Upper Hutt CC fundamentally disagrees with going ahead in advance of the NPS-IB being gazetted but notes that the intent of the provision could be useful if the provision remains.</p> <p>Meridian considers it is premature to advance the scope of changes GWRC proposes to the RPS indigenous biodiversity provisions in the absence of settled guidance from a gazetted National Policy Statement, particularly where the proposed RPS changes relate to terrestrial indigenous biodiversity provisions beyond the scope of a freshwater planning instrument. If GWRC's proposed RPS provisions do not give effect to the future NPS-IB, the RPS will need to be amended in any event. Until settled NPS guidance is available, Meridian prefers the amendments requested in its own submission which reflect the provisions in the proposed Natural Resources Plan (recently settled by Environment Court mediation).</p>	Allow to the extent of making the amendments requested in Meridian's submission in the interim until any further changes are made, by RPS change or variation, to accommodate the future gazetted NPS-IB.
Policy 47	Wellington International Airport Limited	S148.042	Support in part	<p>WIAL is concerned that there are inappropriate limits on offsetting and compensation in Policy 24 which is cross referenced in this policy. The submission requests deletion of subparagraph (i) including the reference to Policy 24 and the limits on offsetting and compensation.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				Meridian agrees that the limits proposed in Policy 24 are inappropriately stringent and agrees they should not be accepted as settled in Policy 47.	
Policy 55				Transpower: supports the inclusion of (a) (ii) (8) (protecting RSI from reverse sensitivity effects).	
Policy 55	Porirua City Council	S30.072	Oppose in part	<p>Porirua CC seeks extensive amendments, including deletion of (ii) (8) protection of RSI.</p> <p>Meridian considers retention of clause (ii) (8) is essential to give effect to the higher order policy instruments which recognise and provide renewable electricity generation (including by protecting it from adverse reverse sensitivity effects associated with urban expansion).</p>	Disallow in part by retaining clause (ii) (8).
Policy 55	Wellington International Airport Limited	S148.051	Support	<p>WIAL submits that in considering urban development particular regard should also be had to whether it is compatible with and does not adversely affect or constrain the ability to operate existing regionally significant infrastructure. The submission seeks amendment to include the following (or with similar effect): <i>'avoids adverse reverse sensitivity effects on the operation and safety of regionally significant infrastructure.'</i></p> <p>Meridian agrees that the RPS needs to consistently protect established regionally significant infrastructure from the adverse effects of urban expansion, including adverse reverse sensitivity effects.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Policy 56	KiwiRail Holdings Limited	S124.010	Support in part	<p>KiwiRail requests insertion of a new clause to protect against reverse sensitivity: '<u>(f) the proposal will result in reverse sensitivity effects</u>'.</p> <p>The context discussed in the submission is transport but Meridian considers the principle is equally applicable to all regionally significant infrastructure. Meridian considers the requested relief could be refined to refer to 'lawfully established existing regionally significant infrastructure'.</p>	<p>Allow in part by amending the requested relief to refer to 'lawfully established existing regionally significant infrastructure'.</p>

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Chapter 4.4					
Policy 65	Genesis Limited Energy	S99.004	Support in part	<p>Genesis (page 8) requests insertion of text explicitly seeking expansion of electricity from renewable sources: '<i>Supporting and encouraging Promoting efficient use and conservation of resources – non-regulatory To promote support and encourage conservation and efficient use of resources by:</i> (a) (e) <u>increasing the proportion of electricity generated from renewable sources;</u> (f) <u>using water and energy efficiently; and</u> (g) <u>conserving water and energy.</u></p> <p><i>Explanation</i> Policy 65 promotes the efficient use of resources to reduce emissions and supports the expansion of electricity generation from renewable sources to assist the transition from fossil fuel dependence. The policy endorses the waste hierarchy and also promotes similar principles for efficient water and energy use.'</p> <p>Meridian agrees the requested amendments are appropriate and align with other similar requests made in Meridian's own submission.</p>	Allow to the extent that any amendments are consistent with Meridian's own requested relief.
Appendix 1A Limits to Biodiversity Offsetting and Compensation	Forest and Bird	S165.052	Oppose	<p>Forest & Bird support the appendix but amendment is sought to be clear that Appendix 1A is not fixed in time and recognises that the threat status of species and ecosystems may change over time. If this occurs the most up to date information should be used.</p>	Disallow

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				Meridian is not sure how this can be achieved without a change to the RPS (in the absence of any specific wording as requested relief).	
Appendix 3					
Definitions: 'Nature based solutions'	Genesis Energy Limited	S99.005	Support	<p>Genesis (page 10) considers the development of electricity from renewable sources is a nature-based solution that reduces greenhouse gas emissions whilst providing resilience for people. In taking actions to address climate change, it is necessary to consider the natural and the built environment in a holistic manner, and provide integration as much as possible. Seeks insertion of text:</p> <p>(a) <u>providing resilience for people ...</u></p> <ul style="list-style-type: none"> <u>maximising electricity generation from renewable energy sources, recognising that renewable electricity generation can often be incorporated within the natural and built environments (e.g. wind farm and carbon forestry, solar panels on rooftops).</u> <p>Meridian agrees there is merit in viewing renewable electricity generation as a form of nature-based solution.</p>	Allow

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Definition: 'Biodiversity Compensation'	Greater Wellington Regional Council	S147.022	Support in part	<p>GWRC requests amendment of the definition as follows: <i>'Biodiversity compensation: A measurable positive environmental outcome resulting from actions that are designed to compensate for residual adverse biodiversity effects that cannot be otherwise managed after avoidance, minimisation, remediation, and biodiversity offset measures have been applied.'</i></p> <p>The wording reflects the definition in the settled proposed Natural Resources Plan. The PNRP definition also refers to a set of principles in Schedule G3. The principles provide helpful guidance. The proposed RPS definition would equally benefit from the addition of an appropriately worded set of principles. In this respect, proposed Appendix 1A and the proposed amendments to RPS Policy 24 are not helpful or complete in providing meaningful guidance for plans.</p>	Allow and consider amending the definition to include constructive guidance on the circumstances when plans should provide for biodiversity compensation.
Definition: 'Biodiversity Compensation'	Forest and Bird	S165.0125	Oppose	<p>Forest & Bird seeks amendment to: <i>'A measurable positive environmental outcome resulting from actions that are designed to compensate for residual adverse biodiversity effects that cannot be <u>avoided remedied mitigated or offset</u> otherwise managed.'</i></p> <p>The amendments proposed to Policy 47 include 'minimising' effects as a response (which Meridian agrees is appropriate). The definition should also refer to minimisation (it is omitted from the Forest and Bird suggestion).</p>	Disallow
Definition: 'Biodiversity Compensation'	Rangitāne o Wairarapa	S168.084	Support in part	<p>Rangitāne o Wairarapa requests amendment of the definition as follows: <i>'A measurable positive environmental outcome resulting from actions that are designed to compensate for residual adverse</i></p>	Allow in part but retain the word 'measurable' and consider and consider amending the definition to include

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				<p><i>biodiversity effects that cannot be otherwise managed avoided, minimised, remediated or offset.</i></p> <p>Meridian reiterates the comments made in relation to submission point S147.022 above. Inclusion of 'measurable' reflects the settled wording of the Proposed Natural Resources Plan.</p>	constructive guidance on the circumstances when plans should provide for biodiversity compensation.
<p>Definition:</p> <p>'Biodiversity Offsetting'</p>	Greater Wellington Regional Council	S137.023	Oppose	<p>GWRC (p. 4 of 9): Amend definition as follows: <i>'A measurable positive environmental outcome resulting from actions designed to redress for the residual adverse effects on biodiversity arising from activities after appropriate avoidance, minimisation, and remediation measures have been applied. The goal of biodiversity offsetting is to achieve no net loss, and preferably at least a 10 percent net gain, of indigenous biodiversity values.'</i> Include a requirement to meet the principles set out in an appendix.</p> <p>Meridian opposes the requirement for a specified minimum 10% net biodiversity gain and seeks retention of the reference to no net loss.</p>	Disallow
<p>Definition:</p> <p>'Biodiversity Offsetting'</p>	Forest and Bird	S.165.0126	Oppose	<p>Forest & Bird: Amend definition to: <i>'A measurable positive environmental outcome resulting from actions designed to redress for the residual adverse effects on biodiversity arising from activities after appropriate avoidance, minimisation, and remediation and mitigation measures have been applied. The goal of biodiversity offsetting is to achieve no net loss, and preferably a net gain, of indigenous biodiversity values.'</i> Include a requirement to meet the principles set out in an appendix.</p>	Disallow

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				The proposed amendments to Policy 47 include reference to minimisation and this should also be referenced in the definition.	
Definition: 'Biodiversity Offsetting'	Rangitāne o Wairarapa	S168.083	Oppose in part	Rangitāne o Wairarapa seek amendment to be consistent with the 10% net gain goal specified in Policy 24 and Appendix 1A. Meridian opposes the requirement for a 10% net gain in Policy 24.	Disallow
Definition: 'Maintain'	Forest and Bird	S.165.0134	Oppose	Forest & Bird queries whether a definition of ecosystem function may be needed (and, if included, it should replicate the definition of 'ecosystem processes' used in the Critical factors report) and strongly supports the recognition that maintenance may require restoration or enhancement. Meridian considers that 'maintain' does not extend to restoration or enhancement.	Disallow
Definition: 'Protect'	Forest and Bird	S165.0138	Support in part	Forest & Bird seeks to ensure that biodiversity and the ecosystem processes are kept safe from harm in both the short and long term. This involves managing all threats to species and ensuring that populations are buffered from the impacts of the loss of genetic diversity and longer-term environmental events such as climate change.	Refine the requested relief to clarify that the definition applies only to indigenous biodiversity.

RPS Change Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
				The definition needs to specify that it applies to indigenous biodiversity only and needs to reflect the relevant definition in the NPS-IB (once gazetted).	
Definition: 'Protect'	Upper Hutt City Council	S34.0106	Support in part	Upper Hutt CC seeks deletion of the definition, with a review once the NPS-IB has been gazetted. The definition needs to reflect the relevant definition from the NPS-IB (once gazetted).	Allow
Definition: 'Protect'	Wellington International Airport Limited	S148.058	Support in part	WIAL seeks to ensure that this definition is consistent with national direction that may be contained in the NPSIB. Delete the definition. The definition needs to reflect the relevant definition from the NPS-IB (once gazetted).	Allow
Definition: 'Te Rito o te Harakeke'	Forest and Bird	S165.0141	Oppose	Forest & Bird supports the definition in principle and requests extensive amendments. Meridian opposes the proposed extensive amendments in the absence of a gazetted NPS-IB.	Disallow

RPS Change 1 Reference:	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
All Indigenous Biodiversity Provisions					
All Indigenous Biodiversity Provisions	Genesis Energy Limited	S99.007	Support	<p>Genesis (covering letter page 4) is concerned that the NPS-IB is not yet confirmed and there is misalignment with RPS Change 1 provisions. Genesis requests withdrawal of all indigenous biodiversity provisions.</p> <p>The RPS must reflect and be consistent with the NPS-IB.</p>	Allow as alternative relief to Meridian's requested other requested relief.
All Indigenous Biodiversity Provisions	Kāpiti Coast District Council	S16.0105	Support	<p>KCDC requests either: Amend all provisions in the plan change that have been developed to give effect to the NPS-IB so they are only applicable to the regional council; or Delete all provisions in the plan change that have been developed to give effect to the draft NPS-IB. KCDC requests all provisions in the plan change that have been developed to give effect to the draft NPS-IB are deleted and that a variation or plan change be prepared to give effect to the NPS-IB only after it has been gazetted. Alternatively, Council would be satisfied with amendments to all relevant provisions so they are only applicable to the regional council.</p> <p>The RPS must reflect and be consistent with the NPS-IB.</p>	Allow as alternative relief to Meridian's requested other requested relief.

Wednesday, January 25, 2023

The Chief Executive
 Greater Wellington Regional Council
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Attention: Hearings Adviser

Kia ora

**PROPOSED CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION:
 AMENDMENT AND ADDITION TO THE FURTHER SUBMISSIONS OF MERIDIAN ENERGY LIMITED**

Meridian Energy Limited (*Meridian*) made a submission and further submissions on Proposed Change 1 to the Regional Policy Statement for the Wellington Region (**RPS-PC1**). Meridian wishes to make one amendment and one addition to the further submission lodged, as set out below.

The information supplied in the submission form lodged on 16 December 2022 is unchanged.

The amendment and addition Meridian wishes to make are as follows:

RPS Change 1 Reference	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Amendment to the further submission by Meridian Energy Limited:					
Policy 47	Porirua City Council	S30 not individually numbered S30.0127 as detailed in Addendum No. 2 (Table 2)	Support in part	<p>Porirua CC seeks amendment to include a statement, deeming provision, or advice note to the effect that the policy shall cease to have effect once policies 23 and 24 are in place in an operative district or regional plan.</p> <p>Meridian expects that this will be the natural consequence of the policy being given effect in operative plan provisions, but sees no harm in such an advice note.</p>	Allow

RPS Change 1 Reference	Submitter	Submission Point No.	Support or Oppose	Reasons:	Decision Sought:
Additional further submission point by Meridian Energy Limited:					
Chapter 3.6 Indigenous Ecosystems	Upper Hutt City Council	S34.0112	Support in part	UHCC opposes the inclusion of indigenous biodiversity provisions at this stage and submits that proposed provisions for indigenous biodiversity should be deleted in their entirety and included in a future plan change once the NPS-IB is gazetted. Should the provisions be retained, Council seeks specific relief as identified in Table 1 below.	Allow to the extent of making the amendments requested in Meridian's submission in the interim until any further changes are made, by RPS change or variation, to accommodate the future gazetted NPS-IB

Ngā mihi



Andrew Feierabend
Statutory and Compliance Strategy Manager

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

Who can make a Further Submission:

A further submission may only be made by a person who:

- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

- Online using our submission portal *Spoken*, at: <https://tinyurl.com/gwrc-rps-change-furthersubs>
- Email your Further Submission and this completed form to: regionalplan@gw.govt.nz
- Post your Further submission and this completed form to: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser. **N.B. Due to delays in postal services and the timeframe for making Further Submissions we highly recommend that an electronic copy of your Further Submission is provided by the closing date OR delivered to one of our offices.**
- Drop your Further Submission and this completed form to reception at one of Greater Wellington’s offices.

(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter	
Name (First and Last) OR Organisation / Company: <u>Winstone Aggregates</u>	
Address for Service (Email OR Postal Address): <u>Cameron.russell@winstoneaggregates.co.nz</u> Phone: <u>0275941962</u>	
Contact name and postal address for service of person making submission: <u>Cameron Russell</u> (If different from above)	
Only certain people may make further submissions Please tick the option that applies to you:	
<input type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input checked="" type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input type="checkbox"/>	I am the local authority for the relevant area.
Specify below the grounds for stating that you are within the category you have ticked: <u>Quarrying activities and aggregate supply in the Wellington Region</u>	

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S114 Fulton Hogan Ltd	S114.008	General comments - overall	<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> <p>Decision requested: Retain as notified</p>	Support	Winstone Aggregates ('Winstone') agrees that aggregate extraction and supply is critical to the construction and maintenance of housing and infrastructure. Winstone also seeks specific support for this in the RPS and planning document hierarchy.	Allow the submission
S29 Aggregate and Quarry Association (AQA)	S29.005	General comments – overall	<p>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.</p> <p>Decision requested: The RPS should be consistent with the existing and upcoming NPS.</p>	Support	Winstone considers consistency with national direction is required and to achieve this, the RPS should recognise the significance of aggregate extraction for the region.	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S136 Dairy NZ	S136.001	General comments – overall	<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 better-informed assessment of GWRC's role in addressing these issues.</p> <p>Decision requested:</p>	Support	<p>Winstone agrees that pre-empting the direction of national policy documents is inappropriate and that it is more appropriate to address various National Policy Statements in 2023 when they have been finalised.</p> <p>Winstone also considers that use of the Freshwater Planning Process is far too broad and that the scope of this should be significantly narrowed.</p>	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			<p>Reduce scope to changes needed to address the NPS-UD and urban climate change related issues only.</p> <p>Postpone all other changes (freshwater, biodiversity, climate change) until at least the scheduled full review of the RPS and Regional Plan in 2024.</p>			
S114 Fulton Hogan Ltd	S114.001	Freshwater introductory text	<p>This introductory text sets the scene and, at a high level, discusses resource management issues facing the region. Shortages of resources, including aggregate, is often poorly understood by the general public and planners. We request that explicit mention be included in this text to help build understanding of these issues.</p> <p>Decision requested:</p> <p>In Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and:</p> <p>(e) recognises the role of both natural and physical resources (<u>including the need for building materials such as aggregate</u>) in providing for the characteristics and qualities of well-functioning urban environments; and ...</p>	Support	Winstone supports the specific recognition of the importance of aggregate in the introductory text.	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S147 Wellington Fish and Game	S147.018	Objective 16	<p>Wellington Fish and Game seeks to amend Objective 16 including to refer to other values including introduced species.</p> <p>Decision requested</p> <p>Amend the 'Ecosystem health' paragraph. Ecosystem health can be measured in a number of ways, including the composition, richness and indigenous dominance of <u>valued indigenous and introduced species communities, function of ecosystem processes</u> (e.g., degree to which it is connected or fragmented), or the extent of the ecosystem remaining.</p>	Oppose	Winstone opposes and considers that it is inappropriate to widen the scope of Objective 16 to managing effects on other values including introduced species as this is inconsistent with the objective and policy direction in the existing RPS, which Winstone is seeking be recognised to the extent set out in Winstones submission.	Reject the submission
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.021	Objective 16	<p>Forest and Bird seek Objective 16 be widened to include protection of significant habitats of indigenous fauna which could be exotic.</p> <p>Decision requested</p> <p>The scope of Objective 16 is broader than just indigenous ecosystems and habitats to ensure protection of significant habitats of indigenous fauna (including exotic habitats such as macrocarpa</p>	Oppose	Winstone opposes the widening of Policy 47 to managing effects on other values including habitats of introduced species as this is inconsistent with the objective and policy direction in the existing RPS, which Winstone is seeking be recognised to the extent	Reject the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			shelter belts and exotic pine forests). Seek consequential changes to policies and methods to ensure significant habitats of indigenous fauna are also protected as per comment above.		set out in Winstone's submission.	
S136 Dairy NZ	S136.006	Objective 16	Dairy NZ requests the deletion of Objective 16 and addressing the issues raised through a full review of the RPS OR Amending Objective 16 as follows (or words to similar effect): <u>Significant indigenous</u> Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are maintained protected, enhanced, and restored to a healthy functioning state.	Support	Winstone supports the submission by Dairy NZ seeking either the deletion or amendment of Objective 16 and is concerned with the scope of Objective 16 for the reasons set out in Winstone's submission.	Allow the submission.
S147 Wellington Fish and Game	S149.019	Objective 16	Wellington Fish and Game in summary seeks the broadening of Objective 16 beyond indigenous ecosystems and habitats. Decision requested Amend Objective 16 as follows: Indigenous ecosystems, and habitats <u>which support</u> significant ecosystem functions, services, <u>valued species</u> and/or biodiversity values, are protected, enhanced, and restored to a healthy functioning state	Oppose	Winstone opposes the submission by Wellington Fish and Game to widen the scope of Objective 16 beyond indigenous ecosystems and species as this is inconsistent with the objective and policy direction in the existing RPS, which Winstone is seeking be recognised to the extent	Reject the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
					set out in Winstone's submission.	
S148 Wellington International Airport Limited (WIAL)	S148.039	Objective 16	<p>In summary WIAL is concerned that Objective 16 and this suite of other provisions in PC1 could significantly impact on infrastructure projects.</p> <p>Decision requested</p> <p>Amend the objective as follows: Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are protected, enhanced, <u>and restored where appropriate and in accordance with an effects management hierarchy in order to achieve an overall</u> healthy functioning state.</p>	Support	Winstone supports the submission by WIAL raising concern that Objective 16 and the supporting suite of provisions could have on key infrastructure and significant quarrying activities in the region, for the reasons set out in Winstones submission.	Allow the submission
S115 Hutt City Council	S115.019	Objective 16A	<p>Hutt City Council request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p> <p>Decision requested</p> <p>Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.</p>	Support	Winstone supports the submission by HCC seeking new or amended provisions in Objective 16A in a manner consistent with the NPS-IB when gazetted or similar for the reasons set out Winstones submission.	Allow the submission.

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S115 Hutt City Council	S115.017	Objective 16B	<p>Hutt City Council request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p> <p>Decision requested</p> <p>Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.</p>	Support	Winstone supports the submission by HCC seeking new or amended provisions in Objective 16B in a manner consistent with the NPS-IB when gazetted or similar for the reasons set out Winstone's submission.	Allow the submission.
S134 Powerco Ltd	S134.010	Policy 18	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where</p>	Support	Winstone supports the requested approach of ensuring that the RPS is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers, and accurately reflects the intent of the NPS-FM – i.e. that loss of river extent and values is avoided <u>to the extent practicable</u> , rather than the blanket avoidance approach proposed in the Plan Change.	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			<p>dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p> <p>Decision requested:</p> <p>Amend Policy 18 to ensure it is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers and to ensure appropriate provision is made for essential temporary construction dewatering takes, including in over-allocated catchments. This could be achieved by making changes along the following lines:</p> <p><i>"Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of water bodies, including:</i></p> <p><i>...(c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their restoration is promoted;</i></p> <p><i>...(e) avoiding the loss of river extent and values;</i></p> <p><i>...."</i></p>			

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.013	Policy 18	<p>The intent of the policy is supported. However, clauses (c) and (e) are opposed to the extent that they do not recognise the exceptions provided in the NPS-FM to the policy direction relating to the loss of extent of wetlands and rivers. These exceptions should be carried over into Policy 18, or clauses (c) and (e) deleted, noting that Regional Plans must give effect to the NPS-FM in any case.</p> <p>In addition, amendments are required to recognise the potential need for essential temporary construction dewatering takes, for instance to facilitate the safe and timely replacement/installation of underground infrastructure. Such takes can be required in over allocated catchments and will not necessarily be considered non consumptive, for instance where dewatering water is discharged to a reticulated stormwater or wastewater system. If this policy is retained as drafted, there is a risk that any such takes will be prohibited in over allocated catchments, despite not affecting the stated outcomes and limits.</p> <p>Decision requested:</p> <p>Delete subclause: (e) avoiding the loss of river extent and values;</p>	Support	Winstone supports the requested approach of ensuring that the RPS is no more restrictive than the NPS-FM in relation to the loss of extent and values of wetlands and rivers, and accurately reflects the intent of the NPS-FM – i.e. that loss of river extent and values is avoided <u>to the extent practicable</u> , rather than the blanket avoidance approach proposed in the Plan Change.	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S32 Department of Conservation (DoC)	S32.018	Policy 23	DoC supports Policy 23 and the inclusion of a deadline to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values that is a shorter timeframe than is currently indicated in the exposure draft of the NPS for Indigenous Biodiversity.	Oppose	Winstone opposes the inclusion of the deadline to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values that is a shorter timeframe than is currently indicated in the exposure draft of the NPS for Indigenous Biodiversity, for the reasons set out in Winstones submission.	Reject the submission
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.073	Policy 23	Upper Hutt City Council opposes the timeframe imposed on territorial authorities stating it is impractical to require territorial authorities to implement this policy by 2025, particularly given timeframes within the NPS-IB indicate a timeframe of 5 years from implementation. Council supports the amendments to refer to the correct wording of mana whenua. Decision requested Retain as operationally written and review once NPS-IB has been gazetted but include wording changes referring to mana whenua.	Support	Winstone supports the submission by Hutt City Council regarding bringing the timings forward for implementation to 25 June 2025 (including areas of significant biodiversity) to the extent that it is consistent with Winstones submission on Policy 23. Winstone supports the amendments to refer to the	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
					correct wording of mana whenua.	
S115 Hutt City Council	S115.047	Policy 23	<p>Hutt City Council in summary, seeks the deletion of all the proposed provisions relating to indigenous biodiversity until the upcoming National Policy Statement on Indigenous Biodiversity is gazetted.</p> <p>Decision requested</p> <p>Delete amendments to Policy 23 and retain the Operative RPS Policy 23 or failing that, amend the deadline from 30 June 2025 to 5 years after RPS Change 1 becomes operative.</p>	Support	Winstone supports the submission by Hutt City Council regarding bringing the timings forward for implementation to 25 June 2025 (including areas of significant biodiversity) to the extent that it is consistent with Winstones submission on Policy 23.	Allow the submission
S148 Wellington International Airport Limited (WIAL)	S148.040	Policy 23	WIAL seeks to ensure Policy 23 is consistent with national guidance, or alternatively ensure the criteria is appropriately targeted so that it does not inadvertently capture areas which do not sensibly comprise significant natural areas or delete the policy.	Support	Winstone supports the submission by WIAL and agrees Policy 23 should be is consistent with national guidance (i.e. NPS-IB when gazetted) or alternatively ensure the criteria is appropriately targeted so that it does not inadvertently capture areas which do not sensibly comprise significant natural areas or delete the policy	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.056	Policy 23	<p>Forest and Bird raise concerns that some councils have still not identified SNAs in their plans.</p> <p>Decision requested</p> <p>Forest and Bird seek that Policy 23 be amended as follows (or words to the same effect): <u>"As soon as possible, and in any event no later than by-30 June 2025"</u> and amend the explanation accordingly.</p>	Oppose	Winstone opposes the inclusion of a deadline to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values that is a shorter timeframe than is currently indicated in the exposure draft of the NPS for Indigenous Biodiversity, for the reasons set out in Winstones submission	Reject the submission
S100 Meridian Energy Limited	S100.016	Policy 24	<p>Decision requested:</p> <p>In summary with respect to Policy 24, MEL seeks</p> <ul style="list-style-type: none"> - Deletion of clause (c); and - Deletion of clause (d) or, in the alternative, replace clause (d) with a requirement for at least no net loss (and preferably a net gain) as follows (or similar) and amend the explanation to match the policy amendments: "By 30 June 2025, district and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats 	Support in part	<p>Winstone supports submission S100.016 in part, to the extent this submission is consistent with Winstones' submission.</p> <p>Winstone agrees that the requirement for 10% gain or benefit via offsetting or compensation is unjustified and more onerous than required by national direction. The request to remove references to the</p>	Allow the submission in part

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			<p>with significant indigenous biodiversity values from inappropriate subdivision, use and development.</p> <p>Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall: ...</p> <ul style="list-style-type: none"> - Amending (d) to require that the outcome sought from the use of biodiversity offsetting achieves at least no net loss and preferably a net gain of biodiversity. <p>....</p>		<p>10% benefit or gain is supported. Winstone is opposed to the inclusion of the 30 June 2025 date in its own submission.</p>	
S134 Powerco Ltd	S134.11	Policy 24	<p>The requirement for a minimum 10% net biodiversity gain or benefit is not clear and is not justified in the section 32 report. This is more onerous than the direction set in the exposure draft of the NPS Indigenous Biodiversity around biodiversity gains or benefits. It is also more onerous than the requirement set by the Proposed Natural Resources Plan (PNRP), which sets an outcome of no net biodiversity loss. In lieu of clear direction being set through a gazetted NPS</p>	Support	<p>Winstone agrees that the requirement for 10% gain or benefit via offsetting or compensation is unjustified and more onerous than required by national direction. The request to remove references to the 10% benefit or gain is supported. Winstone is opposed to the inclusion of</p>	Allow the submission in part.

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			<p>Indigenous Biodiversity, the RPS should be amended to adopt the approach set by the PNRP.</p> <p>Decision requested:</p> <p>In lieu of the NPS Indigenous Biodiversity being gazetted, amend Policy 24 to ensure the requirements around offsetting are no more onerous than those set out in the Proposed Natural Resources Plan (PNRP), which sets an outcome of no net biodiversity loss. This could be achieved by making changes as follows or to the same effect: <i>"By 30 June 2025, district and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development.</i> <i>Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall:</i></p> <p>...</p> <p><i>(d) require that the outcome sought from the use of biodiversity offsetting is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit. achieves no net biodiversity loss.</i></p> <p><i>Explanation</i></p>		<p>the 30 June 2025 date in its own submission.</p>	

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			<i>Policy 24 applies to provisions in regional and district plans ...Calculating a 10 percent net biodiversity gain (offsetting) or a 10 percent net biodiversity benefit (compensation) employs the same or a similar calculation methodology used to determine 'no net loss or preferably net gain' under a standard offsetting approach. The distinction between 'net gain' and 'net benefit' is to recognise that the outcomes achievable through the use of offsetting and compensation are different..."</i>			
S137 Greater Wellington Regional Council	S137.018	Policy 24	Decision requested Amend Policy 24 as follows: By 30 June 2025, district and regional plans shall include policies, rules and/or methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development.	Oppose	Winstone opposes the changes to Policy 24 sought by GWRC, for the reasons set out in Winstones' submission.	Reject the submission
S137 Greater Wellington Regional Council	S137.019	Policy 24	GWRC has sought amendments to Policy 24 to improve readability and clarity. Decision requested	Oppose	Winstone opposes the changes to Policy 24 sought by GWRC, for the reasons set out in Winstones' submission	Reject the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			In summary, GWRC seek the deletion of existing subclause (c) and redrafting subclause (d) as a new subclause (c) with amendments of Policy 24.			
S147 Wellington Fish and Game Council	S147.023	Policy 24	<p>The suggested amendment is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protection of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p> <p>Decision requested:</p> <p>Amend title and text:</p> <p><i>Policy 24: protecting indigenous ecosystems, and habitats with significant biodiversity <u>or other</u> values, in district and regional plans</i></p> <p><i>By 30 June 2025, district and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity <u>or other</u> values from</i></p>	Oppose	The wording change proposed in this submission would set a concerning precedent, is wholly unjustified and unquantified and is not supported by any national direction documents, and would have significant implications beyond those already outlined in Winstone's original submission on this policy.	Reject the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			<i>inappropriate subdivision, use and development. Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity or other values, they shall:</i>			
S148 Wellington International Airport	S.148.041	Policy 24	Wellington International Airport (WIA) opposes Policy 24 and considers the policy is inappropriate in that it sets out limits and constraints as to when offsetting and compensation are available. Decision requested WIA seeks the deletion of the proposed amendments to the policy including the limits associated with offsetting and compensation within this policy (a) - (d).	Support in part	Winstone agrees with WIA that Policy 24 is inappropriate and supports the deletion of the amendments to Policy 24 including the limits associated with offsetting and compensation for the reasons set out in Winstones submission.	Accept the submission in part
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.057	Policy 24	Forest and Bird seek a series of amendments to Policy 24 including a full set of offsetting and compensation principles either in policy 24 or elsewhere in the RPS.	Oppose	Winstone opposes Policy 24 including the limits associated with offsetting and compensation for the reasons set out in Winstones submission.	Reject the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S99 Genesis Energy Limited	S99.003	Policy 39	<p>Decision requested:</p> <p>Amend Policy 39 as shown below.</p> <p><i>Policy 39: Recognising <u>Promote, enable and protects the benefits from renewable energy and regionally significant infrastructure - consideration</u></i></p> <p><i>When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:</i></p> <p><i>(a) <u>Promoting, enabling and protecting the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions; and</u></i></p> <p><i>(b) <u>protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and</u></i></p> <p><i>(c) <u>the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and</u></i></p> <p><i>(d) <u>significant wind, solar and marine renewable energy resources within the region and new low or zero carbon energy resources that may be identified as technology advances.</u></i></p> <p><i>Explanation</i></p>	Support	Winstone sought specific recognition of mineral resources in the title and in (b) and (c) of this policy. Winstone supports the amendments sought by Genesis, if they are made alongside the relief sought in Winstone's original submission, and considers that these amendments provide for active management to ensure that the benefits of infrastructure and quarrying activities are realised, rather than passive recognition.	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			<p><i>Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions.</i></p>			
S100 Meridian Energy Limited	S100.018	Policy 39	<p>Decision requested:</p> <p>Amend Policy 39 as shown below.</p> <p><i>Policy 39: Recognising Promote, enable and protects the benefits from renewable energy and regionally significant infrastructure - consideration</i></p> <p><i>When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:</i></p> <p><i>(a) Promoting, enabling and protecting the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions; and</i></p> <p><i>(b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and</i></p> <p><i>(c) the need for renewable electricity generation</i></p>	Support	<p>Winstone sought specific recognition of mineral resources in the title and in (b) and (c) of this policy. Winstone supports the amendments sought by Meridian, if they are made alongside the relief sought in Winstone's original submission, and considers that these amendments provide for active management to ensure that the benefits of infrastructure and quarrying activities are realised, rather than passive recognition.</p>	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			<p><i>facilities to locate where the renewable energy resources exist; and</i></p> <p><i>(d) significant wind, solar and marine renewable energy resources within the region <u>and new low or zero carbon energy resources that may be identified as technology advances.</u></i></p> <p><i>Explanation</i></p> <p><i>Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions.</i></p>			
S114 Fulton Hogan Ltd	S114.003	Policy 39	<p>This policy relates to renewable energy and regionally significant infrastructure. National policy direction including the proposed revision to the NES-F and NPS-HPL include recognition of regionally and nationally significant aggregate resources. This policy would be an ideal location to provide recognition of the importance of these resources and reflect the policy direction from the national policy documents.</p> <p>Decision requested:</p>	Support	This submission seeks specific recognition of the importance of quarrying and agrees with the classification of quarrying activities as rural production and questions whether the current framework gives adequate recognition to aggregate under the NPS-HPL. This submitter seeks to achieve the same	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
			Add clause e) <u>the need for quarrying activities to locate where aggregate (clay, silt, rock or sand) resources exist.</u>		purpose as Winstone's original submission.	
S129 Waka Kotahi NZ Transport Agency	S129.023	Policy 47	<p>Policy should be aligned with the NPS-IB exposure draft.</p> <p>Decision requested:</p> <p>Align Policy 47 with the NPS-IB exposure draft and clarify how to manage effects.</p>	Oppose	Pre-empting the direction of national policy documents, including by giving effect to exposure drafts, is inappropriate and that it is more appropriate to address various National Policy Statements in 2023 when they have been finalised.	Reject the submission
S148 Wellington International Airport Ltd (WIAL)	S148.042	Policy 47	<p>WIAL is concerned that there are inappropriate limits on offsetting and compensation in Policy 24 which is cross referred to in this policy. These reasons are set out above.</p> <p>Decision requested:</p> <p>Delete subparagraph (i) including the reference to Policy 24 and the limits on offsetting and compensation.</p>	Support	For the same reasons as outlined in its original submission, Winstone agrees that the limits to use of offsetting or compensation is unjustified and more onerous than required by national direction. Winstone supports the removal of reference to Policy 24 from this provision.	Allow the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.074	Policy 47	<p>Forest and Bird seek the inclusion of a new subclause (i) in Policy 47 that requires offsetting and compensation, as a matter that shall be given effect to and also require adherence to a full set of mandatory offsetting and compensation principles</p> <p>Decision requested:</p> <p>Include in Policy 47, (i) as a matter that has to be "given effect to", not "have regard to."</p> <p>Also include a new requirement to give effect to a full set of mandatory offsetting and compensation principles, that are included in the RPS.</p>	Oppose	<p>Winstone opposes the inclusion of the new subclause (i) sought by Forest and Bird that requires offsetting and compensation to be given effect to (rather than have regard to) and adherence to an undefined set of offsetting and compensation principles, for the reasons generally set out in Winstones submission.</p>	Reject the submission
S147 Wellington Fish and Game	S147.027	Policy 47	<p>Wellington Fish and Game are concerned that while the protection of indigenous ecosystems and habitats is vital, so is maintaining and enhancing the whole environment including those containing introduced species.</p> <p>Decision requested:</p> <p>Amend Policy 47 to refer to managing effects on ecosystems and habitats with significant indigenous biodiversity <u>and other values</u>.</p>	Oppose	<p>Winstone opposes the widening of Policy 47 to managing effects on other values.</p>	Reject the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S162 Winstone Aggregates	S162.017	Policy 65	Winstone seeks new subclause: <u>(j) protecting the habitats of indigenous freshwater species, trout, and salmon.</u>	Amend	This submission point has been incorrectly coded – it applies to Policy 64, not Policy 65.	Amend the submission summary.
S137 Greater Wellington Regional Council (GWRC)	S137.023	Definition – biodiversity offsetting	<p>Delete appropriate as it is imprecise.</p> <p>Also amend to reflect the fact that we are directing a net gain outcome from the use of offsetting.</p> <p>Decision requested:</p> <p>Amend definition as follows:</p> <p><i>Biodiversity offsetting</i></p> <p><i>A measurable positive environmental outcome resulting from actions designed to redress for the residual adverse effects on biodiversity arising from activities after appropriate avoidance, minimisation, and remediation measures have been applied. The goal of biodiversity offsetting is to achieve no net loss, and preferably at least a 10 percent net gain, of indigenous biodiversity values.</i></p>	Oppose	<p>As with the proposed changes to Policy 24, the requested amendments to this definition have significant implications for biodiversity offsetting objectives and policies in the RPS. Winstone considers that this submission point should be rejected as the proposed amendments represent a substantial and tangible shift in policy direction, and further reinforce the impracticality of the offsetting provisions.</p> <p>Winstone does not oppose the request to delete 'appropriate' from the definition.</p>	Reject the submission

Original submitter's name and number	Submission point number	Section reference	Original submission	Support/oppose	Reason for support/opposition	Decision sought by Winstone Aggregates
S114 Fulton Hogan Ltd	S114.007	Definition – regionally significant infrastructure	<p>Given the recognition that has been provided in national level policy such as the NES-F and NPS-HPL for aggregate extraction, we recommend that there be provision for regionally or nationally significant aggregate quarries in the definition of "regionally significant infrastructure".</p> <p>Decision requested:</p> <p>Add a bullet point to the activities listed in the definition of regionally significant infrastructure.</p> <ul style="list-style-type: none"> - <u>Aggregate extraction that provides significant national or regional public benefit that could not otherwise be achieved using resources within New Zealand.</u> 	Support	If specific recognition of mineral resources is not provided alongside the definition of regionally significant infrastructure, Winstone supports the inclusion of aggregate extraction in the definition of regionally significant infrastructure.	Allow the submission

Further submission .

Proposed Change 1 to the Regional Policy Statement for the Wellington Region

19 December 2022

To: Greater Wellington Regional Council

Name of Submitter: Horticulture New Zealand

Contact for Service:

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OVERVIEW

Submission structure

- 1 Part 1: HortNZ's Role
- 2 Part 2: Further submissions on behalf of HortNZ

Our submission

Horticulture New Zealand (HortNZ) made a submission on Proposed Change 1 to the Regional Policy Statement (RPS) and welcomes any opportunity to continue to work with Greater Wellington Regional Council and to discuss our submission.

The details of HortNZ's further submissions and decisions we are seeking from Council are set out below.

HortNZ's Role

Background to HortNZ

HortNZ represents the interests of approximately 5,500 commercial fruit and vegetable growers in New Zealand who grow around 100 different fruit, and vegetables. The horticultural sector provides over 40,000 jobs.

There is approximately, 80,000 hectares of land in New Zealand producing fruit and vegetables for domestic consumers and supplying our global trading partners with high quality food.

It is not just the direct economic benefits associated with horticultural production that are important. Horticulture production provides a platform for long term prosperity for communities, supports the growth of knowledge-intensive agri-tech and suppliers along the supply chain; and plays a key role in helping to achieve New Zealand's climate change objectives.

The horticulture sector plays an important role in food security for New Zealanders. Over 80% of vegetables grown are for the domestic market and many varieties of fruits are grown to serve the domestic market.

HortNZ's purpose is to create an enduring environment where growers prosper. This is done through enabling, promoting and advocating for growers in New Zealand.



HortNZ's Resource Management Act 1991 Involvement

On behalf of its grower members HortNZ takes a detailed involvement in resource management planning processes around New Zealand. HortNZ works to raise growers' awareness of the Resource Management Act 1991 (RMA) to ensure effective grower involvement under the Act.

Further Submission

1. Horticulture New Zealand's (HortNZ) further submissions are contained in the attached table below.
2. HortNZ represents commercial fruit and vegetable growers in the Wellington Region, so represents a relevant aspect of the public interest.
3. HortNZ is not a trade competitor and could not gain any advantage in trade competition through this further submission.
4. HortNZ wishes to be heard in support of its further submissions.
5. If others make similar submissions, HortNZ will consider presenting a joint case with them at the hearing.

Further submission on behalf of HortNZ on Proposed Change 1 to the Regional Policy Statement (RPS)

Submitter	Sub #	Provision	Support/Oppose	Reasons:	Decision sought:
S29 Aggregate and Quarry Association (AQA)	S29.006	General comments - overall	Support	The submitter seeks that the RPS be consistent with the NPSHPL and forthcoming NPSIB; HortNZ support aligning PC1 to be consistent with national direction.	Allow amendment to be consistent with national direction
S78 Beef + Lamb New Zealand Limited	S78.001	General comments - overall	Support in part	As alternative relief to that expressed in HortNZ's primary submission, HortNZ would support the withdrawal of the freshwater, indigenous biodiversity and climate change for consideration in a future plan change in 2024 (to enable consistency with upcoming NPSIB direction and other relevant national direction).	Allow in part
S136 DairyNZ	S136.001	General comments - overall	Support in part	As alternative relief to that expressed in HortNZ's primary submission, HortNZ would withdrawal of the freshwater, indigenous biodiversity and climate change for consideration in a future	Allow in part

				plan change in 2024 (to enable consistency with upcoming NPSIB direction and other relevant national direction).	
S163 Wairarapa Federated Farmers	S163.001	General comments - overall	Support in part	As alternative relief to that expressed in HortNZ's primary submission, HortNZ would withdrawal of the freshwater, indigenous biodiversity and climate change for consideration in a future plan change in 2024 (to enable consistency with upcoming NPSIB direction and other relevant national direction).	Allow in part
S163 Wairarapa Federated Farmers	S163.003	General comments - Chapter 3	Support in part	HortNZ support a review of the appropriate provisions which should be subject to the freshwater planning process.	Allow amendment to ensure only freshwater provisions are subject to the freshwater planning process
S106 Patricia (Dr) Laing	S106.007	Overarching Objective A	Support	HortNZ support recognition of the importance of food security in the region - this aligns with key themes of HortNZ's submission,	Allow amendment to refer to food security.
S163 Wairarapa Federated Farmers	S163.007	Overarching Objective A	Support in part	HortNZ support the proposed amendment in respect of enabling collaboration.	Allow amendment to overarching objective A to emphasise strengthening the

					connections between people and place, hapu and community
S113 Wellington Water	S113.003	Climate change introductory text	Support	HortNZ agree that water security is an important issue that needs to be considered in the context of climate change.	Allow amendment to refer to water security in the list of regionally significant climate change issues.
S148 Wellington International Airport Ltd (WIAL)	S148.015	Climate change introductory text	Support	HortNZ acknowledge the need to be consistent with other climate change related regulations and to recognise the role the RMA plays in the context of other tools.	Allow amendment to reflect the other mechanisms which drive the overall approach to climate change as part of the introductory text.
S167 Taranaki Whānui	S167.012	Issue 1: Greenhouse gas emissions must be reduced significantly, immediately and rapidly	Oppose	The extent of the relief sought is unclear - HortNZ seek that the RPS play an enabling role with respect to reducing emissions and is consistent with national direction/policy.	Disallow
S129 Waka Kotahi NZ Transport Agency	S129.002	Objective CC.1	Neutral	HortNZ has an interest in how climate mitigation and adaptation are further defined should this relief be accepted.	Neutral

S158 Kāinga Ora Homes and Communities	S158.004	Objective CC.1	Support	The proposed amendment adds clarity to the intent of the provision/role that the RPS plays.	Allow amendment to Objective CC.1.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.003	Objective CC.1	Oppose in part	The wording proposed not align with the Climate Change Response Act 2002 'net zero' wording (for greenhouse gases other than biogenic methane), nor does the wording proposed align with the framing of the objective	Disallow
S168 Rangitāne O Wairarapa Inc	S168.0105	Objective CC.1	Support	HortNZ support transition to a low emissions economy being in such a way that enables people and communities to provide for their social, economic and cultural wellbeing	Allow amendment to Objective CC.1 to provide for their social, economic and cultural wellbeing
S25 Carterton District Council	S25.004	Objective CC.3	Support in part	HortNZ support further clarity being provided in Objective CC3	Allow amendment to align with national targets
S137 Greater Wellington Regional Council (GWRC)	S137.007	Objective CC.3	Support	The amendment provides greater clarity on intent.	Allow amendment to Objective CC.3

S148 Wellington International Airport Ltd (WIAL)	S148.017	Objective CC.3	Support in part	HortNZ support alignment with national legislation for emissions budgets and associated policy.	Allow amendment to Objective CC.3 to reflect alignment with national legislation and approach
S113 Wellington Water	S113.004	Objective CC.4	Support	The amendment sought provides alternative relief that aligns with HortNZ's submission.	Allow amendment to Objective CC.4
S25 Carterton District Council	S25.009	General comments - fresh water	Support	HortNZ agree that the Freshwater Planning Process should be applied only to freshwater provisions in the manner described by the High Court.	Allow review/amendment (where required) to use the Freshwater Planning Process only where freshwater is the primary issue.
S25 Carterton District Council	S25.010	General comments - fresh water	Support	HortNZ agree that the way that the Te Mana o Te Wai statements are integrated into the RPS could be clearer for plan users.	Allow amendment to add clarity to the linkage between Te Mana o Te Wai statements and the rest of the RPS
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.004	General comments - fresh water	Support in part	HortNZ agree with the concerns that some provisions are dependent on other provisions that are yet to be determined.	Allow amendments which add clarity to the implementation of provision that rely on yet-to-occur processes.
S136 DairyNZ	S136.022	General comments - fresh water	Support	HortNZ support further work to add to how Te Mana o Te Wai applies on the regional context.	Allow

S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.019	General comments - fresh water	Oppose	The relief sought adds another 'layer' to the NOF framework (which required long-term visions to be set for FMU) that is not required and will create confusion as to how this fits within the RPS and broader freshwater policy framework.	Disallow
S168 Rangitāne O Wairarapa Inc	S168.005	General comments - fresh water	Support	HortNZ agree with the view of Rangitāne O Wairarapa Inc. that many of the freshwater provisions simply duplicate the NPSFM	Allow amendment to reduce duplication of the NPSFM (subject to specifics of the amendment sought)
S168 Rangitāne O Wairarapa Inc	S168.009	General comments - fresh water	Oppose in part	There could be unintended consequences of applying policy developed for the urban context to other development and seek that any such changes were undertaken through a separate process.	Disallow relief in relation to expanding the policy beyond the urban development intent for which these provisions were drafted without further review and s32 analysis.
S168 Rangitāne O Wairarapa Inc	S168.012	General comments - fresh water	Oppose in part	There could be unintended consequences of applying policy developed for the urban context to rural development and seek that any such changes were undertaken through a separate process.	Disallow relief in relation to expanding urban development to a rural context as part of PC1
S145 Wairarapa Water Users Society	S145.001	Freshwater introductory text	Support in part	HortNZ support a decision to defer review of freshwater provisions until	Allow in part

				2024, or to the extent provisions are retained recognition of the work undertake to date as referred to in the submission.	
S30 Porirua City Council	S30.012	Objective 12 (Te Mana o te Wai Expressions)	Support in part	HortNZ support amendments to amendments should provide clarity as to the status and purpose of the iwi statements,	Allow in part
S86 Irrigation New Zealand (IrrigationNZ)	S86.001	Objective 12	Support	HortNZ support a regional articulation of Te Mana o Te Wai that recognises the importance of water for growing healthy food for the health of people.	Allow
S113 Wellington Water	S113.005	Objective 12 (Te Mana o te Wai Expressions)	Support	HortNZ support amendment to make it clearer for plan users how the iwi statements are given effect in the document	Allow amendment to provide clarity as to how the Te Mana o Te Wai statements operate as part of the RPS
S140 Wellington City Council (WCC)	S140.015	Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	HortNZ agree there could be greater clarity as to how the Te Mana o Te Wai expressions are given effect to/ integrated into the RPS	Allow relief providing clarity

S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.067	Table 4	Support in part	HortNZ support Method 36, to support Industry-led environmental accords and codes of practice	Allow to the extent that Method 36 is retained
S136 DairyNZ	S136.005	General comments - indigenous ecosystems	Support	HortNZ support separating out provisions to focus on freshwater and indigenous biodiversity to align with the implementation of the NPS-IB and NPS-FM	Allow
S163 Wairarapa Federated Farmers	S163.034	General comments - natural hazards	Support	HortNZ agree that the Freshwater Planning Process should be limited to freshwater focused provisions only	Allow relief, to the extent that the application of the freshwater planning process is reviewed.
S163 Wairarapa Federated Farmers	S163.039	General comments - urban development	Support	The proposed amendments add clarity to the focus of the provisions	Allow relief
S163 Wairarapa Federated Farmers	S163.040	General comments - urban development	Support	HortNZ agree that the Freshwater Planning Process should be limited to freshwater focused provisions only.	Allow relief, to the extent that the application of the freshwater planning process is reviewed.
S30 Porirua City Council	S30.029	Policy CC.5: Avoid increases in agricultural greenhouse gas	Oppose in part	The exact relief sought is not clear - HortNZ support an approach in PC1 which enables changes that reduce emissions	Disallow/ Relief sought is not clear

		emissions - regional plan			
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.036	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	To the extent that the provision is retained, clarity would be improved by linking this to regional functions and ensuring the implementation requirements are clear and feasible	Allow in part
S79 South Wairarapa District Council	S79.022	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	To the extent that the provision is retained, the focus on managing (and as sought in HortNZ's submission enabling change that reduced emissions) rather than a punitive approach	Allow drafting amendments sought that amend 'avoid' to 'manage' and to acknowledge the variation nature of farming systems, and clarity as to the implementation in the policy for consenting
S99 Genesis Energy Limited	S99.001	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans	Oppose	The proposed amendment relating to protection from reverse sensitivity is not aligned with the intent of Policy 7 (and is addressed elsewhere in the RPS)	Disallow
S163 Wairarapa Federated Farmers	S163.050	Policy 7: Recognising the benefits from	Support in part	To the extent that amendments to Policy 7 are progressed, support	Allow in part

		renewable energy and regionally significant infrastructure - regional and district plans		recognition of critical role of water supply infrastructure across all regional sectors	
S115 Hutt City Council	S115.037	Policy 12: Management of water bodies - regional plans	Support	HortNZ agree that the policy duplicates the NPSFM and there would be value in applying the NPSFM direction in a regional context	Allow (subject to specific amendment sought)
S147 Wellington Fish and Game Council	S147.008	Policy 12: Management of water bodies - regional plans	Support in part	HortNZ agree that there is uncertainty as to how the provisions apply ahead of long-term visions being set.	Allow amendment providing clarity
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.047	Policy 12: Management of water bodies - regional plans	Support in part	The proposed drafting relief sought provides a means of addressing differences with the NPSFM.	Allow amendments that address avoiding conflict with national direction
S168 Rangitāne O Wairarapa Inc	S168.038	Policy 14: Urban development effects on freshwater and the coastal marine area - regional plans	Oppose in part	There could be unintended consequences of applying policy developed for the urban context to rural development and seek that any	Disallow relief in relation to expanding the policy beyond the urban development intent for which these provisions were

				such changes were undertaken through a separate process.	drafted without further review and s32 analysis.
S32 Director-General of Conservation	S32.014	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support in part	HortNZ agree that there is ambiguity in referring to yet to be set target attribute states	Allow in part
S163 Wairarapa Federated Farmers	S163.053	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Support	HortNZ agree that there is ambiguity in referring to yet to be set target attribute states	Allow
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.050	Policy 15: Managing the effects of earthworks and vegetation disturbance - district and regional plans	Oppose	An 'avoid' adverse effects direction is too absolute in this policy context	Disallow amendment sought to Policy 15
S163 Wairarapa Federated Farmers	S163.054	Policy 17: Take and use of water for the health needs of	Support	As an alternative relief to that sought in HortNZ's submission, would be to	Allow should the review of freshwater provisions be deferred to 2024

		people - regional plans		defer the amendment of this provision until a full review in 2024	
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.013	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support	HortNZ support aligning with the NPSFM direction	Allow
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.052	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Oppose	The avoid direction sought in (n)-(p) is too absolute for all situations and an approach that is more stringent than the NPSFM has not been justified. The amendment to (q) does not grammatically make sense.	Disallow
S168 Rangitāne O Wairarapa Inc	S168.043	Policy 18: Protecting and restoring ecological health of water bodies - regional plans	Support in part	Support alignment with the term 'ecosystem health' in the NPSFM and drafting improvements.	Generally allow (subject to specific drafting)
S113 Wellington Water	S113.024	Policy FW.1: Reducing water demand - regional plans	Support in part	HortNZ support alignment with terms used by Taumata Arowai in terms of the water suppliers that the	Allow in part

				provision applies to (where these align with intent)	
S113 Wellington Water	S113.025	Policy FW.2: Reducing water demand - district plans	Support in part	HortNZ support alignment with terms used by Taumata Arowai in terms of the water suppliers that the provision applies to (where these align with intent)	Allow in part
S115 Hutt City Council	S115.057	Policy IM.2: Equity and inclusiveness - consideration	Support	HortNZ support amendment that clarifies how this policy would apply to resource consents in the RMA context	Allow
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.037	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	HortNZ support additional clarity as to what consents this applies to and how it will be implemented	Allow
S79 South Wairarapa District Council	S79.041	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	HortNZ support recognition within the policy of local food supply	Allow

S136 DairyNZ	S136.016	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	HortNZ support additional clarity as to what consents this applies to and how it will be implemented and the RPS taking an enabling, as opposed to punitive approach (i.e support the policy being used as a carrot not just a stick)	Allow amendments that add clarity and enable change
S163 Wairarapa Federated Farmers	S163.068	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	HortNZ support the need to recognise the benefits of water storage infrastructure as expressed in the reason for this submission	Allow in part
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.062	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	HortNZ support review of the policy to ensure it can feasibl be achieved	Allow
S147 Wellington Fish and Game Council	S147.009	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater	Oppose	The relief sought does not align with the policy direction in the NPSFM (which includes 'where practicable')	Disallow

		ecosystems - consideration			
S147 Wellington Fish and Game Council	S147.010	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	The relief sought conflicts with the policy direction in the NPSFM	Disallow
S147 Wellington Fish and Game Council	S147.011	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	The relief sought conflicts with the policy direction in the NPSFM	Disallow
S162 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S162.013	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	HortNZ support alignment with the direction set in the NPS-FM 2020 and NPS-FM and any update	Allow amendments to accurately reflect the direction set in the NPS-FM 2020 and NPS-FM and any update

S100 Meridian Energy Limited	S100.020	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Support amendment to 'minimise' and retaining operation provision in absence of limits.	Allow
S86 Irrigation New Zealand (IrrigationNZ)	S86.002	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	HortNZ support amendment to give effect to the NPSHPL	Allow
S136 DairyNZ	S136.017	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	HortNZ agree that further work is required to articulate Te Mana o Te Wai at the regional level	Allow review as part of full review of the RPS (as alternative relief to that proposed in HortNZ's submission)
S144 Sustainable Wairarapa Inc	S144.041	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	The proposed wording may restrict water storage options unnecessarily	Disallow
S113 Wellington Water	S113.040	Policy FW.5: Water supply planning for climate change and	Oppose in part	The wording proposed is not sufficiently clear as to how the proposed amendment to (d) would be implemented	Disallow

		urban development - consideration			
S16 Kāpiti Coast District Council	S16.040	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	HortNZ support consideration of reverse sensitivity effects	Allow amendment to include (e) relating to reverse sensitivity
S137 Greater Wellington Regional Council (GWRC)	S137.042	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Support the need to recognise HPL in this policy, subject to Policies 56 and 59 being consistent with the NPSHPL	Allow to the extent that it is consistent with the NPSHPL
S137 Greater Wellington Regional Council (GWRC)	S137.043	Policy 55: Providing for appropriate urban expansion - consideration	Support	Support inclusion of HPL in clause (a) of this policy	Allow
S118 Peka Peka Farm Limited	S118.016	Policy 56: Managing development in the rural areas - consideration	Support in part	HortNZ support alignment with the NPSHPL, but generally consider that (a) should remain a policy consideration. The roles and focus of 55, 56 and UD.3 could be clarified to ensure consistency with the NPSHPL.	Allow in part
S120 The Retirement Villages	S120.005	Policy 56: Managing development in the	Support in part	HortNZ support alignment with the NPSHPL, but generally consider that	Allow in part

Association of New Zealand		rural areas - consideration		(a) should remain a policy consideration. The roles and focus of 55, 56 and UD.3 could be clarified to ensure consistency with the NPSHPL.	
S124 KiwiRail Holdings Limited	S124.010	Policy 56: Managing development in the rural areas - consideration	Support in part	HortNZ support reverse sensitivity as an important consideration, noting that it is currently noted in clause (a)	Allow relief to the extent that reverse sensitivity is comprehensively addressed in the policy
S136 DairyNZ	S136.018	Policy 56: Managing development in the rural areas - consideration	Support	HortNZ support aligning Policy 56 with the NPS HPL	Allow relief
S137 Greater Wellington Regional Council (GWRC)	S137.045	Policy 56: Managing development in the rural areas - consideration	Support in part	HortNZ support alignment with the NPSHPL, however consider that the drafting proposed could be clearer. In addition, the NPSHPL has more direct requirements than the 'particular regard shall be given to' direction in the chapeau.	Allow in part, subject to amendment to ensure the drafting is clear and gives effect to the NPSHPL.
S137 Greater Wellington Regional Council (GWRC)	S137.046	Policy 56: Managing development in the rural areas - consideration	Support in part	HortNZ support amendment to align with the NPSHPL, this explanation should be included only to the extent that any edits to the policy are made consistent with the NPSHPL.	Allow to the extent that amendments to Policy 56 are made to align with NPSHPL

S140 Wellington City Council (WCC)	S140.077	Policy 56: Managing development in the rural areas - consideration	Support in part	HortNZ support re-framing the policy to focus on what is outcome is sought provided this is consistent with the NPSHPL	Allow relief to the extent that it is consistent with the NPSHPL
S168 Rangitāne O Wairarapa Inc	S168.0174	Policy 56: Managing development in the rural areas - consideration	Support in part	HortNZ supports amendments that improve the policy, provided these two considerations remain	Allow relief - provided both issues are sufficiently addressed in the policy
S168 Rangitāne O Wairarapa Inc	S168.0176	Policy 56: Managing development in the rural areas - consideration	Support	HortNZ support changes required to align with the NPS HPL	Allow relief
S168 Rangitāne O Wairarapa Inc	S168.0177	Policy 56: Managing development in the rural areas - consideration	Support	HortNZ support amendments to align the explanation with the content of Policy 56.	Allow relief
S124 KiwiRail Holdings Limited	S124.012	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support	HortNZ support consideration of reverse sensitivity effects.	Allow relief

S86 Irrigation New Zealand (IrrigationNZ)	S86.005	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Support clarification such that primary industries are sufficiently accounted for.	Allow relief
S163 Wairarapa Federated Farmers	S163.083	Policy FW.7: Water attenuation and retention - non-regulatory	Support	HortNZ support this provision being expressed as an objective (or a policy), recognising the importance of water attenuation and retention.	Allow relief
S86 Irrigation New Zealand (IrrigationNZ)	S86.006	Method 34: Prepare a regional water supply strategy	Support	HortNZ support the need to consider the role of water storage as part of a water supply strategy	Allow amendment to place a greater emphasis on the importance of water storage as part of a resilient regional water supply strategy
S163 Wairarapa Federated Farmers	S163.094	Method 34: Prepare a regional water supply strategy	Support in part	HortNZ agree that the amendments to the policy reduce the ability to consider rural water supply strategy	Allow amendment to ensure address rural water supply is considered
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.0109	Method 34: Prepare a regional water supply strategy	Support	HortNZ's support engaging with stakeholders and the community for the preparation of a water supply strategy	Allow relief
S113 Wellington Water	S113.047	Method 48: Water allocation policy review	Oppose in part	HortNZ support clarity amendments, but seek to retain the consideration of transferable permits as a method	Disallow relief seeking deletion of (d) and (i)

				of improving allocation efficiency and climate resilient land use.	
S168 Rangitāne O Wairarapa Inc	S168.063	Method 48: Water allocation policy review	Support in part	HortNZ support editorial corrections. It is appropriate for the review to consider allocation methods.	Allow relief that provides clarity as to the review directed by the policy
S79 South Wairarapa District Council	S79.052	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Support this method being undertaken in conjunction with stakeholders	Allow relief
S137 Greater Wellington Regional Council (GWRC)	S137.047	General comments - definitions	Support	HortNZ support amendments to align with the NPSHPL	Allow amendment to include a definition for highly productive land consistent with the NPSHPL
S137 Greater Wellington Regional Council (GWRC)	S137.062	General comments - definitions	Support	This definition is consistent with the Natural Resources Plan	Allow relief

S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.046	Hazard sensitive activity	Support	As stated, 'hazardous facilities and major hazardous facilities', on the basis that these terms are not defined which leaves ambiguity	Allow relief
S163 Wairarapa Federated Farmers	S163.0109	Nature-based solutions	Support	Support alignment with the NZ Biodiversity Strategy	Allow relief
S163 Wairarapa Federated Farmers	S163.0113	Regionally significant infrastructure	Support in part	HortNZ would support consideration of water storage infrastructure in this definition - this would be consistent with the amended definition of specified infrastructure in the NPSFM	Allow relief that provides for water storage infrastructure.

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

Who can make a Further Submission:

A further submission may only be made by a person who:

- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

- Online using our submission portal *Spoken*, at: <https://tinyurl.com/gwrc-rps-change-furthersubs>
- Email your Further Submission and this completed form to: regionalplan@gw.govt.nz
- Post your Further submission and this completed form to: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser. **N.B. Due to delays in postal services and the timeframe for making Further Submissions we highly recommend that an electronic copy of your Further Submission is provided by the closing date OR delivered to one of our offices.**
- Drop your Further Submission and this completed form to reception at one of Greater Wellington's offices.

(All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter	
Name (First and Last) OR Organisation / Company: Ngā Hapu o Otaki _____	
Address for Service (Email OR Postal Address): office@ngahapuootaki.nz ___ Phone: 0210658281	
Contact name and postal address for service of person making submission: Rangitopeora Wiremu _____ (If different from above)	
Only certain people may make further submissions Please tick the option that applies to you:	
<input type="checkbox"/>	I am a person representing a relevant aspect of the public interest; or
<input type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); or
<input checked="" type="checkbox"/>	I am the local authority for the relevant area.
Specify below the grounds for stating that you are within the category you have ticked: _____	

2. Appearance at hearing Please select from the following:

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input checked="" type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
<input checked="" type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearing

3. For the further submitter to action

Service of your further submission:

Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**

Each submitter has an address for service available at: <https://www.gw.govt.nz/rps-pc-1-submissions>

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: _____ **Date:** _____

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means.

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

All Further Submissions (including name and address for service) are made publicly available on our website. Your name and address for service will be used for correspondence during the hearing process. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

Please enter further submission points in the table on the following pages

4. Further submission points

Please complete the following table with details of which original submission points you support and/or oppose, and why.

Submitter name or, Submitter number of the submission you are commenting on:	Submission point number: <i>Identified in the summary of decisions requested table</i>	Stance on the submission point: (Support, Oppose, Support in part, or Oppose in part)	Reasons: <i>Why you support or oppose this point</i>	Decision sought: (Allow, Disallow, Allow in part, or Disallow in part) <i>Identify the whole or part(s) of the submission point that this is in reference to</i>
Te Runanga O Toa Rangatira	S170	Support	<p><i>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</i></p> <p><i>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</i></p> <p><i>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</i></p> <p><u>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making – Support in principal</u></p> <p><u>FW Kaitiakitanga 01, 02, 03 – Support in principal</u></p> <p><u>Wai Mate 01,02,03 - Support in principal</u></p>	

			<p><i>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</i></p> <p><i>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</i></p>	
Ātiawa Ki Whakarongotai Charitable Trust	S131	Support	<p><i>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</i></p> <p><i>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</i></p> <p><i>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</i></p>	

			<p><i>3.4 Freshwater including Public Access – Support in Principal</i></p> <p><i>3.6 Indigenous Ecosystems – Support in Principal</i></p> <p><i>3.9 Regional Form, Design and Function – Support in Principal</i></p> <p><i>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</i></p>	
Wairarapa Federated Farmers	S163	OPPOSE	<p><i>Section 18, page 4: General Comments - OPPOSE</i></p> <p><i>Section 25, Page 5 Going Forward - OPPOSE</i></p> <p><i>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</i></p> <p><i>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't</i></p>	

			<i>feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</i>	

further pages as required



Further Submission

22 December 2022

TO THE

GREATER WELLINGTON REGIONAL COUNCIL

ON THE

**PROPOSED CHANGE NUMBER 1 TO THE
REGIONAL POLICY STATEMENT FOR THE
WELLINGTON REGION**

BY

Beef + Lamb New Zealand Ltd

**FURTHER SUBMISSION ON PROPOSED CHANGE NUMBER 1
TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION**

Clause 6 of First Schedule, Resource Management Act 1991

To: Wellington Regional Council

Email: regionalplan@gw.govt.nz

Name of submitter: Beef + Lamb New Zealand Limited

Contact person: Lilly Lawson

Email: Lilly.Lawson@beeflambnz.com

Phone: 0273844686

Address for service: PO Box 121, Wellington 6140, New Zealand

Beef + Lamb New Zealand Limited could not gain an advantage in trade competition through this submission.

FURTHER SUBMISSION

Section A. Introduction

1. Beef + Lamb New Zealand Ltd (B+LNZ) was a submitter on Proposed Change 1 to the Regional Policy Statement for the Wellington Region (**PC1**).
2. B+LNZ is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand.
3. B+LNZ's vision is 'Sustainable and profitable farmers, thriving rural communities, valued by New Zealanders'. An important part of B+LNZ's role is investing in building capability and capacity to support a vibrant, resilient, and profitable sector based around thriving communities.
4. B+LNZ is actively building our work programme throughout the region to support the integrated and sustainable management of land and water resources. B+LNZ is:
 - (i) Working with farmers to develop Land Environment Plans (LEP) through levy funded workshops;
 - (ii) Developing and implementing science and extension programmes to help identify, prioritise, and implement on farm actions that will make a difference to improving water quality, aquatic habitats, and biodiversity;
 - (iii) Working with farmer leaders throughout the region to support uptake of farm environment plans and to encourage and support the development of sub catchment approaches to managing water quality; and
 - (iv) Working with farmers to know their greenhouse gas number through levy funded workshops.
5. B+LNZ is actively engaged in environmental management, with a particular emphasis on building farmers' capability and capacity to support an ethos of environmental stewardship, as part of a vibrant, resilient, and profitable sector based around thriving communities. Protecting and enhancing New Zealand's natural capital and economic opportunities and the ecosystem services they provide is fundamental to the sustainability of the sector and to New Zealand's wellbeing for current and future generations.
6. B+LNZ's submission raised concerns with the timing, efficiency, and engagement process of the plan change. B+LNZ accept that changes to the RPS are necessary, in a compressed timeframe, to give effect the NPS-UD. However, B+LNZ consider that incorporating changes into PC1 on freshwater provisions without completing the necessary engagement as intended by Part 3.2 of the NPS-FM, is inefficient and

premature. Furthermore, PC1 including objectives relating to Climate Change and Indigenous Biodiversity before national legislative changes have been finalised is inefficient and creates unnecessary duplication, confusion, and uncertainty for the rural community. There is also a fundamental issue in that the changes proposed fail to distinguish between the emissions reductions/warming impacts of short and long-lived emissions which is a fundamental concept to New Zealand's approach to climate change. The changes proposed materially impact on rural communities and B+LNZ consider that it would be more efficient and lead to better outcomes for the Wellington Region to limit changes to the RPS to those necessary to give effect to the NPS-UD and that any other matters should be subject to proper review in the scheduled full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where parties have sought specific relief that B+LNZ support as an alternative to withdrawing the provision, it has been noted in the table below.

Yours faithfully,

Lilly Lawson
Senior Environment Policy Analyst
Beef + Lamb New Zealand

SECTION B. FORM 6

B+LNZ could not gain an advantage in trade competition through this further submission.

B+LNZ are making this Further Submission, because, as an industry good organisation representing sheep and beef farmers, we have an interest in this Plan Change process which is greater than the general public interest.

B+LNZ wishes to be heard in support of its Further Submission and, is willing to consider presenting a joint case at hearing with other submitters addressing similar issues.

We can confirm that we are authorised to make this further submission on B+LNZ's behalf, that copies will be served on the person who made the original submissions to which it relates within 5 working days from 19 December 2022.

Submitter Number	Submitter Point	Section of the Proposed Plan	B+LNZ Submission is that:		The decision that B+LNZ would like Greater Wellington Regional Council to make and relief sought:
			SUPPORT/ OPPOSE	REASON	
Anders Crofoot					
80	001, 003, 004, 005	Chapter 3, 3.3, 3.4, 3.5	Support	B+LNZ support that regional and national policy statements and plans are created in a streamlined way that avoids duplication of review processes.	That this submission be allowed.
	002	Chapter 3.1A	Support	B+LNZ agree that the chapter does not reflect national policies such as a split gas approach. Differentiation between long and short-lived gases is a fundamental concept to climate change.	That this submission be allowed.
Atiawa ki Whakarongotai Charitable Trust					
131	004	Chapter 3.4 Freshwater	Support in part	B+LNZ agree with the concerns raised on partial implementation of the NPSFM2020 and consider it would be more efficient and effective to wait until the freshwater plan change processes have been completed to ensure they are adequately informed by the necessary engagement required under Part 3.2 of the NPSFM2020.	That this submission be allowed in part.
	023	Chapter 3.1A Climate Change,	Support in part	B+LNZ acknowledge the sentiment of Atiawa submission that the agriculture industry requires support to achieve	That this submission be allowed in part.

		Objective CC.3		<p>meaningful GHG emissions and that the Regional Council need to work with the industry to amend Objective CC.3. B+LNZ consider that the climate change provisions have material impacts on the rural community, and they have not been adequately consulted or engaged with on these matters. B+LNZ have fundamental issues with Plan Change One in that the changes proposed fail to distinguish between the emissions reductions/warming impacts of short and long-lived emissions which is a fundamental concept to New Zealand's approach to climate change. The timing of such provisions is also unwelcomed with key national legislation yet to be finalised and therefore runs the risk of unnecessary duplication, confusion and misalignment with national direction</p>	
Dairy NZ					
136	136.002	General Comments overall	Support	B+LNZ agree it is inefficient to widen the scope of matters outside those required to give effect to the NPS-UD until such time as the necessary engagement has been completed and there is certainty with important national legislation for the NPS-IB and climate change.	That this submission be allowed.
	136.003, 004.	Chapter 3.4 Freshwater:	Support	As above.	That this submission be allowed.

		General comments, Table 4, Objective 12			
	136.005, 006, 007, 008	Chapter 3.6 Indigenous Ecosystems: Obj 16, 16A, 16C	Support	B+LNZ supports the withdrawal of PC1 provisions relating to indigenous biodiversity and redrafting once the NPS-IB has been gazetted.	That this submission be allowed.
	136.009, 010, 011, 012, 013, 014	Chapter 3.1A Climate Change: Obj CC.1, 2, 3, 4, 6, 7,	Support	B+LNZ supports the withdrawal of provisions relating to climate change in order to undertake the necessary analysis, use the most up to date science and be consistent with national direction on climate change.	That this submission be allowed.
	136.015, 016	Chapter 4.1 Regulatory Policies Policy CC.5, 13	Support	B+LNZ supports the withdrawal of provisions relating to climate change in order to undertake the necessary analysis, use the most up to date science and be consistent with national direction on climate change and avoid unnecessary duplication.	That this submission be allowed.
	136.020	Chapter 4.5 Methods to implement policies: Method CC.5	Support	As above.	That this submission be allowed.

	136.022	Chapter 3.4 Freshwater: General Comments	Support	B+LNZ supports further consultation to determine how Te Mana o te Wai applies to freshwater in the region.	That this submission be allowed.
Director General of Conservation					
32				B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and B+LNZ do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	

Greater Wellington Regional Council

137	137.002,003	Chapter 3.4 Freshwater (General comments)	Oppose	B+LNZ submitted that to include freshwater provisions before the Whaitua process has been concluded is premature and the section 32 report describes the Whaitua process to inform and support the preparation of regional plan and regional policy statement provisions to give effect to the requirements of the NPSFM. Where Whaitua processes have not yet concluded it cannot be said that the proposed PC1 freshwater policies are fully informed by the outcomes of Whaitua engagement process. B+LNZ questions the appropriateness of Council submitting to insert vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in the Proposed RPS while acknowledging that they were not originally included due to the desire to enable a 'truly partnered approach to the plan change development'.	That this submission be disallowed.
	137.011	Chapter 4.5: Method CC.8	Oppose	B+LNZ submission sought the withdrawal of climate change provisions and redrafting to align with national legislation, importantly distinguishing between the emissions reductions/warming impacts of short lived and long-lived emissions.	That this submission be disallowed, and climate change provisions are redrafted to align with national direction and once national policy has landed for consistency and to avoid unnecessary duplication.

	137.019 137.020	Chapter 4.1 Policy 24	Oppose	B+LNZ sought the withdrawal of provisions relating to indigenous biodiversity and seek these be redrafted once the NPS-IB becomes operative.	That this submission be disallowed.
	137.058, 059, 060, 061	Chapter 3.1A: Objective CC.5, Policy CC.6, CC.18, Method CC.4,	Support in part	B+LNZ supports the intent of GWRC's submission to clarify that the objectives and policies 'are not intended to support unfettered afforestation across the region with the sole purpose of providing a carbon sink'. However, B+LNZ maintains significant concern with the drafting of these provisions and seek that they are withdrawn and redrafted when national legislation is completed. B+LNZ considers GWRC's submission points to highlight the need for well thought out provisions relating to climate change based on science and an understanding of the implications for productive land use and the rural community.	That this submission be allowed in part.
Horticulture New Zealand					
128	001	Chapter 3, Issue 1	Support in part	B+LNZ support the recognition that highly productive land as a finite resource needs to be reflected in resource management issues and decisions. Sheep and beef farming occurs on land outside of LUC 1 – 3 and therefore land that has significance to	That this submission be allowed, and additional relief is provided to recognise food producing land that occurs on LUC classes outside 1-3.

				food production should be recognised despite LUC rating.	
002	Chapter 3, Objective A	Support	B+LNZ support policy amendments that reflect integrated management.	That this submission be allowed.	
003	Chapter 3.1A Introduction	Support	B+LNZ support amendments which reflect the impact climate change has on food security.	That this submission be allowed.	
014, 015, 016	Chapter 3.9, regional form, design and function introductory text, Issue B, Issue 2	Support in part.	B+LNZ supports the importance of recognising highly productive land. And those provisions relating to urban development should support a productive and sustainable rural environment. B+LNZ seek that this is not limited to HPL as defined by the NPS-HPL but also recognises versatile soils where food production also occurs.	That this submission be allowed in part.	
017, 018	Chapter 3.9, Objective 22	Support in part.	B+LNZ supports that highly productive land should be protected for food production and from reverse sensitivity. B+LNZ seek versatile soils used for food production are also recognised and provided for in recognition of their value to food production.	That this submission be allowed in part.	
025	Chapter 4.1, Policy 12	Support	B+LNZ supports relief which recognises that long term visions may not be achieved within one generation.	That this submission be allowed.	
026	Chapter 4.1, Policy 15	Support	B+LNZ supports the inclusion of earthworks and vegetation disturbance	That this submission be allowed.	

				definitions to assist in the interpretation of regional policies.	
Irrigation New Zealand					
86	005	Chapter 4.4, Policy FW.7	Support	B+LNZ supports water infrastructure that allows for a sustainable and resilient future for New Zealand farmers.	That this submission be allowed.
	006	Chapter 4.5, Method 34	Support	B+LNZ agrees that Regional Policy Statements need to place emphasis on the importance of water infrastructure to support a sustainable and resilient future for New Zealand farmers. B+LNZ agree that method 34 should consider water security for primary production.	That this submission be allowed.
Kahungunu Ki Wairarapa					
169	169.002,003,005	Chapter 3.4: Freshwater	Support in part.	In principle, B+LNZ support the inclusion of iwi expressions of Te Mana o Te Wai in PC1, however B+LNZ agree with Wellington Fish and Game that the concept of Te Mana o Te Wai forms the fundamental underpinning of the NPS-FM and that currently as drafted Objective 12 falls short of what is required under the NPSFM, particularly in regard to the engagement with communities to determine what the application of Te Mana o te Wai means in the GWR. We consider this an important step for the successful implementation of Te Mana o Te Wai.	That this submission be allowed in part.
Rangitāne O Wairarapa Inc					

168	168.005	Chapter 3.4	Support in part	B+LNZ agree that replicating or paraphrasing the requirements of the NPSFM does not provide further assistance to plan users looking for guidance on the interpretation of national direction at a regional level and that this will generate inefficiencies in future resource management processes. Rangitāne O Wairarapa Inc are seeking amendments to appropriately give effect to those NPSFM provisions in terms that reflect the regional context. B+LNZ consider that currently, the RPS does not give effect to Part 3.2 of the NPSFM2020 in terms of the necessary engagement from communities who will be materially impacted by these provisions.	That this submission be allowed in part.
	168.009		Neutral	B+LNZ support in the concept of ensuring the use and development of land is managed in an integrated manner.	Support in part.
		Plan Change Generally	General Comment	B+LNZ generally oppose submissions that seek further changes or support for provisions relating to climate change and agriculture before national legislation is finalised; implementing provisions of the NPSFM-2020 before the necessary engagement has been completed; and pre-empting the NPS-IB before it has been gazetted. B+LNZ are seeking	That these submissions be disallowed.

				<p>changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	
Royal Forest and Bird Protection Society of New Zealand Inc					
165	Whole submission	Plan Change Generally	Generally oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters</p>	<p>That this submission be disallowed.</p>

				<p>should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	
	165.007	Objective CC.5	Oppose	<p>B+LNZ considers that the wording 'equivalent increase in browser control' is unclear and the intent does not recognise, assess, or consider the benefit vs cost of such an objective.</p>	<p>That this submission be disallowed.</p>
	165.019	Chapter 3.4 Freshwater Water – General Comments	Oppose	<p>It is inappropriate to suggest the inclusion of a Wellington Region Vision in accordance with Clause 3.3 of the NPSFM2020 without undertaking the necessary community engagement as required by Part 3.4 of the NPS-FM.</p>	<p>That this submission be disallowed.</p>

	165.038, 039	Chapter 4.1: Regulatory Policies Policy CC.5, 6	Oppose	This policy relies on the actions of rural communities and will significantly affect rural people, land, and businesses. It is inappropriate to include such policies without the necessary engagement with the rural community and ahead of the implementation of national legislation relating to climate change. Furthermore, Plan Change One does not differentiate between short and long-lived gases and is therefore inconsistent with the fundamental concept to New Zealand's approach to climate change.	That this submission be disallowed.
Wairarapa Federated Farmers					
163	Whole of submission	Plan Change Generally	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	That this submission be allowed.
Wellington Fish and Game Council					
147	Whole of submission	Plan Change Generally	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the	That the submission be disallowed with the exception of 147.007.

				<p>National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	
	147.007	Chapter 3.4: Freshwater Objective 12.	Support in part	<p>B+LNZ agree that the concept of Te Mana o te Wai forms the fundamental underpinning of the NPS-FM and that currently as drafted Objective 12 falls short of what is required under the NPSFM, particularly in regard to the engagement with communities to determine what the application of Te Mana o te Wai means in the GWR.</p>	That this submission be allowed in part.

Proposed Plan Change 1 to the Regional Policy Statement for the Wellington Region – Further Submission Form (Form 6)



Further Submissions on a Publicly Notified Change to a Plan or Policy Statement under Clause 8 of the First Schedule to the Resource Management Act 1991. **The closing date for Further Submissions is 5pm Monday 19 December 2022.**

Who can make a Further Submission:

A further submission may only be made by a person who:

- Represents a relevant aspect of the public interest; and
- Has an interest in the proposal that is greater than the interest than the general public has.
(an explanation for the reasoning behind why you qualify for this category must also be provided)

Or,

- The local authority itself.

For information on making Further Submissions see the Ministry for the Environment website:

<http://www.mfe.govt.nz/publications/rma/everyday-guide-rma-making-submission-about-proposed-plan-or-plan-change>

For information on the Regional Policy Statement Plan Change 1 or our Further submissions processes please visit our website: www.gw.govt.nz/rpschange1

How to make a Further Submission:

- Online using our submission portal *Spoken*, at: <https://tinyurl.com/gwrc-rps-change-furthersubs>
 - Email your Further Submission and this completed form to: regionalplan@gw.govt.nz
 - Post your Further submission and this completed form to: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser. **N.B. Due to delays in postal services and the timeframe for making Further Submissions we highly recommend that an electronic copy of your Further Submission is provided by the closing date OR delivered to one of our offices.**
 - Drop your Further Submission and this completed form to reception at one of Greater Wellington’s offices.
- (All sections of this form need to be completed for the submission to be accepted).

1. Details of further submitter	
Name (First and Last) OR Organisation / Company <u>Ian Gunn</u>	
Address for Service (Email OR Postal Address): <u>s o g @ x t r a . c o . n z</u> Phone: <u>021567134</u> Optional	
Contact name and postal address for service of person making submission: <u>Ian Gunn, 4B MacKay street Paraparaumu Beach 5032</u>	
(If different from above)	
Only certain people may make further submissions Please tick the option that applies to you:	
<input type="checkbox"/>	I am a person representing a relevant aspect of the public interest; orX
<input type="checkbox"/>	I am a person who has an interest in the proposal that is greater than the interest the general public has (for example, I am affected by the content of a submission); orX
<input type="checkbox"/>	I am the local authority for the relevant area.

Specify below the grounds for stating that you are within the category you have ticked:

2. Appearance at hearing Please select from the following:

<input type="checkbox"/>	I <u>do not</u> wish to be heard in support of my further submission; or
<input type="checkbox"/>	I <u>do</u> wish to be heard in support of my further submission; and, if so,
<input type="checkbox"/>	I would consider presenting a joint case with others making a similar further submission at any hearingX

3. For the further submitter to action

Service of your further submission:

Please note that any person making a further submission **must serve a copy of that submission on the original submitter no later than five working days after the submission has been provided to Greater Wellington.**

Each submitter has an address for service available at: <https://www.gw.govt.nz/rps-pc-1-submissions>

If you have made a further submission on a number of original submissions, then copies of your further submission will need to be served with each original submitter.

Signature: Ian Gunn _____ **Date: 3 / 1 / 2 3** _____

Signature of person making further submission or person authorised to sign on behalf of person making the further submission. A signature is not required if you make your submission by electronic means. Ian Gunn

Privacy statement – To read our Privacy Statement please visit: <https://www.gw.govt.nz/rps-privacy-statement>

All Further Submissions (including name and address for service) are made publicly available on our website. Your name and address for service will be used for correspondence during the hearing process. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

Please enter further submission points in the table on the following pages

-----Original Message-----

From: Jean Gunn <sog@xtra.co.nz>

Sent: Sunday, 18 December 2022 10:10 pm

To: Regional Plan <regionalplan@gw.govt.nz>

Cc: Vern Brasell <vernbrasell@gmail.com>; Duncan Moore <duncanm37@gmail.com>; Mbirch321 <mbirch321@gmail.com>; Amber Craig <amber@tahetoka.nz>; ra smith <nukupewapewa75@gmail.com>

Subject: Further submissions to Plan Change No1

Kia ora koutou,

My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032.

Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council.

On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model.

As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane.

Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution.

We are heartened by the widespread support for the original document.

Thanks for an opportunity to make a further submission.

Nga mihi nui

Ian Gunn