

## Attachment 1: Greater Wellington Regional Council Submission on Proposed RPS Change 1

Specific provision	Position	Reasons for submission	Relief sought
Freshwater chapter introduction	Support with amendment	Freshwater visions in the regional policy statement will drive freshwater provisions in the Natural Resources Plan at the whitua scale. A map of whitua boundaries is therefore necessary to support the freshwater visions for each whitua.	Insert a map of whitua boundaries, exactly as shown in Attachment 2 of this submission, into the introductory text for Chapter 3.4, with the following caption: <a href="#">Figure 2A: Map of whitua boundaries.</a>
Freshwater chapter introduction	Freshwater chapter introduction	Add in a sentence to provide context for the whitua boundaries map.	Insert the following sentence into the introductory text for Chapter 3.4: ... <a href="#">Figure 2A shows a map of whitua boundaries.</a>
Freshwater general	Support with amendment	<p>The National Policy Statement for Freshwater Management (NPS-FM) requires the regional council to not delay and implement the NPS-FM as soon as reasonably practicable. Section 3.3(1) requires that “every regional council must develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement.”</p> <p>The regional council did not include vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in Proposed RPS Change 1 due to the desire to enable a truly partnered approach to the plan change development which was ultimately constrained by time.</p> <p>A number of parties have questioned this decision and expressed their expectation that freshwater vision objectives should have been included in the Proposed RPS Change 1. The regional council now seeks to include through submissions freshwater vision (to give effect to the NPS-FM 2020) objectives for Whitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whitua.</p> <p>The visions in this submission have come from the whitua processes for these whitua, through input from community and mana whenua / tangata whenua.</p>	<p>Insert freshwater vision for Te Awarua-o-Porirua into Chapter 3.4, as shown below:</p> <p><b><a href="#">Objective 12A: Freshwater vision for Te Awarua-o-Porirua</a></b>  <a href="#">The health and wellbeing of Te Awarua-o-Porirua and all of the waterbodies and ecosystems within Te Awarua-o-Porirua Whitua are restored, their waters are healthy and future generations are sustained, physically and culturally. Such that within 20 years:</a></p> <p>(a) <a href="#">The harbour, waterbodies and coast are clean and brimming with life and have diverse and healthy ecosystems,</a></p> <p>(b) <a href="#">The harbour, waterbodies and coast can be used to gather and catch kaimoana and mahinga kai,</a></p> <p>(c) <a href="#">The harbour, waterbodies and coast flow naturally and with energy, attracting people to connect with them,</a></p> <p>(d) <a href="#">The harbour, waterbodies and coast are safe and accessible for people to enjoy and undertake recreational activities,</a></p> <p>(e) <a href="#">Te Awarua-o-Porirua is recognised (acknowledged and protected) as an ancestral treasure of Ngāti Toa Rangatira,</a></p> <p>(f) <a href="#">Ngāti Toa Rangatira are able to exercise its kaitiakitanga and are integral to a partnership model for the ongoing protection of the harbour and its waterways, and</a></p> <p>(g) <a href="#">Land is developed, used and managed to maintain or restore natural hydrology and habitat, reduce contaminant losses and minimise creation of contaminants.</a></p>
Freshwater general	Support with amendment	<p>The NPS-FM requires the regional council to not delay and implement the NPS-FM as soon as reasonably practicable. Section 3.3(1) requires that “every regional council must develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement.”</p> <p>The regional council did not include vision statements for Te Whanganui-a-Tara and Te Awarua-o-Porirua in Proposed RPS Change 1 due to the desire to enable a truly partnered approach to the plan change development which was ultimately constrained by time.</p> <p>A number of parties have questioned this decision and expressed their expectation that freshwater vision objectives should have been included in the Proposed RPS Change 1. The regional council now seeks to include through submissions freshwater vision (to give effect to the NPS-FM 2020) objectives for Whitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whitua.</p> <p>The visions in this submission have come from the whitua processes for these whitua, through input from community and mana whenua / tangata whenua.</p>	<p>Insert freshwater vision for Whitua te Whanganui-a-Tara into Chapter 3.4, as shown below:</p> <p><b><a href="#">Objective 12B: Freshwater vision for Whitua te Whanganui-a-Tara</a></b>  <a href="#">All freshwater bodies in Te Whanganui-a-Tara are wai ora and estuarine areas are healthy and functioning within 100 years, including:</a></p> <p>(a) <a href="#">The āhua of the Korokoro, Kaiwharawhara, Te Awa Kairangi, Wainuiomata, and Ōrongorongo Awa and Parangārehu Lakes is fully restored</a></p> <p>(b) <a href="#">Mana Whenua are the lead agency and regulator for protection and restoration of wai ora in 20 to 50 years’ time</a></p> <p>(c) <a href="#">Tamariki support mātua, tuākana and whānau, hapū and iwi to restore and protect awa using tools like iwi kaitiaki plans within 20 years.</a></p> <p>(d) <a href="#">Pakeke are active in paid mana whakahaere roles overseeing monitoring, management, and improvement of wai ora in 20 years.</a></p> <p>(e) <a href="#">Taiohi are active kaitiaki and kaikohikai in the wider catchment and are inducted into wai ora monitoring programmes like Ngā Mangai Waiora (ambassadors for water) within 20 years.</a></p> <p>(f) <a href="#">All waterbodies in Te Whanganui-a-Tara are suitable for primary contact/kaukau (swimming) by 2041.</a></p> <p>(g) <a href="#">Native fish have access to move freely up and down the entire length of the catchment to complete their life cycle within 20 years.</a></p> <p>(h) <a href="#">Iwi can safely harvest and eat (identified species) of local mahinga kai throughout the catchment in 20 years.</a></p>

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			<p>(i) <u>Mahinga kai species are plentiful enough in all catchments for long term harvest including for manuhiri and to exercise manaakitanga within 20 years.</u></p> <p>(j) <u>The mauri/mouri and life-supporting capacity of water in Te Whanganui-a-Tara enables the customary practices of Mana Whenua such as tohi, whakarite, whakawātea manaakitanga at a range of places throughout the whitua.</u></p> <p>(k) <u>The mana of water as a source of life is restored including regarding and respecting all waterbodies (including āku waiheke), repo (wetland) and estuaries as living entities,</u></p> <p>(l) <u>All freshwater bodies are allowed to exhibit their natural rhythms, natural form, hydrology and character, including through a range of flows over the seasons.</u></p> <p>(m) <u>There are sufficient flows and levels to support connectivity throughout mai i uta ki tai and between rivers and their banks to support spawning fish.</u></p> <p>(n) <u>Key areas such as te mātāpuna (headwaters), estuaries and repo (wetland) are protected and restored so that they support healthy functioning ecosystems.</u></p>
Policy 14	Support with amendment	Amendments to wording for consistency with Policy 12. Addition of 'urban' for clarity on development referred to.	Amend Policy 14 as follows: <del>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:</del> ... (e) Require <del>the urban</del> development, including stormwater discharges, earthworks and vegetation clearance to meet any limits set in a regional plan; ...
Policy 18	Support with amendment	Amendments are required to improve readability.	Amend Policy 18 as follows: ... (c) <u>ensuring</u> there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected, and their <i>restoration</i> is promoted; ... (h) <u>ensuring</u> freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;
Policy FW.6	Support with amendment	Amendments to align with wording in section 30 of the Resource Management Act.	Amend Policy FW.6 as follows: (a) <u>Wellington Regional Council has primary responsibility for freshwater. Wellington Regional Council shall be responsible for the control of the use and development of land for the purposes of maintenance and enhancement of water quality and ecosystems in water bodies, and maintenance of water quantity <del>water quality and quantity.</del></u>
Objective CC.3	Support with amendment	Insert 'contribute to' into clause (b) for consistency with clause (a).	<u>To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced:</u> (a) <u>By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels, including a:</u> (i) <u>35 percent reduction from 2018 levels in land transport-generated greenhouse gas emissions, and</u> (ii) <u>40 percent increase in active travel and public transport mode share from 2018 levels, and</u> (iii) <u>60 percent reduction in public transport emissions, from 2018 levels, and</u> (b) <u>By 2050, to contribute to achieving net-zero emissions.</u>
New definition - climate resilient urban areas	Support with amendment	It is more appropriate for the definition for climate resilient urban areas to sit within the definitions section of the document rather than in the explanation. This will assist with clarity and achieving the policy intent.	Insert a new definition for 'climate resilient urban areas' using the text currently in the explanation of Policy CC.4, as below: <b><u>Climate resilient urban areas:</u></b> <b><u>Means urban areas that have the ability to withstand:</u></b> • <u>Increased temperatures and urban heat island</u> • <u>Increased intensity of rainfall and flooding</u> • <u>Droughts and urban water scarcity and security</u> • <u>Increased intensity of wind, cold spells, landslides, fire, and air pollution.</u>

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Policy CC.9	Support with amendment	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 <del>and or</del> development <del>have has</del> been planned <del>in a way that contributes to reducing greenhouse gas emissions by to optimise optimising</del> overall transport demand, maximising mode shift from private vehicles to public transport or active modes, <del>and supporting the move towards low and zero-carbon modes in a way that contributes to reducing greenhouse gas emissions.</del>
Policy CC.14	Support with amendment	Amendments are required to improve readability and clarity.	Amend Policy CC.14 as follows: ... (a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, <del>including working and work towards achieving a target</del> of 10 percent <i>tree canopy cover</i> at a suburb-scale by 2030, and 30 percent cover by 2050.... (f) <del>promoting</del> buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.
Method CC.8	Support with amendment	Clarify the need to resource and implement the climate change extension programme.	Amend Method CC.8 as follows: By June 2024, develop <del>and implement</del> a targeted climate change extension programme to actively promote and support changes to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change, including by: ...
Method CC.2	Remove method.	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.
Definition - Highly erodible land	Support with amendment	Amend the definition to remove the confusion introduced by referring to two different approaches to identify areas at risk of erosion. The proposed amendment aligns with the definition for highly erodible land used by MFE and Statistics NZ to inform national erosion management policy and state of the environment monitoring, with a spatial digital layer already available.  The erosion susceptibility classification used in the National Environmental Standards for Plantation Forestry 2017 (NES-PF) was developed to inform good plantation forestry practice specifically to implement the NES-PF, rather than identifying priority areas for recovering forest cover. This classification captures only a small sub-set of highly erodible land. The RPS policy intent is to increase forest extent on a much wider area of eroding hill country.	Amend the definition as shown below: <b>Highly Erodible Land</b> <del>Means</del> Land at risk of severe erosion (landslide, earthflow, and gully) if it does not have a protective cover of deep-rooted woody vegetation. <del>Land classified as very high (red) according to the erosion susceptibility classification in the National Environmental Standards for Plantation Forestry 2017.</del>
Policy 9	Support with amendment	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.	Amend Policy 9 as follows: The Wellington Regional Land Transport <del>Plan Strategy</del> shall include objectives and policies that promote a reduction in: ... (c) <del>increasing</del> the uptake of low emission or zero carbon fuels, biofuels and new technologies; <del>and</del> (d) <del>the decarbonisation of the public transport vehicle fleet.</del> ...
Method CC.10	Support with amendment	The notified heading does not reflect the method as well as it could.  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.	Amend Method CC.10 as follows: <b>Method CC.10: Establish incentives to shift to low and zero-carbon multi modal transport <del>active and public transport</del></b>

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			Establish, support and promote a range of incentives for uptake of <del>low and zero-carbon zero and low-carbon</del> multi modal transport, <u>including public transport</u> , to reduce greenhouse gas emissions, and to support an equitable and inclusive transition.
Policy EIW.1	Support with amendment	Amendments are required to improve readability.	Amend Policy EIW.1 as follows: The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle, <del>by contributing to reducing greenhouse emissions.</del>
Policy 24	Support with amendment	Amendments are required to improve readability and clarity.	Amend Policy 24 as follows: By 30 June 2025, <del>D</del> district and regional plans shall include policies, rules and <u>/or</u> methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development. Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall: (a) not provide for biodiversity offsetting: (i) where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or (ii) when an activity is anticipated to cause <del>s</del> residual adverse effects on an area after an offset has been implemented, if the ecosystem or species is threatened, or the ecosystem is naturally uncommon; (b) not provide for biodiversity compensation where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally uncommon; <u>and</u> <del>(c) ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation);</del> <del>(c)</del> 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.  <u>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).</u>  Add to bottom of explanation: <u>Policy 47 determines which activities are 'inappropriate', being those that may adversely affect certain key ecological characteristics of an area.</u>
Policy 61	Support with amendment	Amendments to Policy 61 are required to align with direction in Policy FW.6 on freshwater jurisdiction.	Amend Policy 61 as follows: ... (c) city and district councils shall be responsible for developing objectives, policies, rules and/or methods in district plans for the control of the use of land for the maintenance of indigenous <del>biological</del> biodiversity, <u>including adverse effects on indigenous biodiversity in freshwater bodies</u> . This excludes <u>the management of land within the coastal marine area and the beds of lakes and rivers.</u>
Definition – Biodiversity compensation	Support with amendment	Amend to align with the offsetting definition and the similar definition in the National Policy Statement for Indigenous Biodiversity exposure draft.  Also amend to reflect the fact that we are directing a net benefit outcome from the use of compensation.	Amend definition as follows: <b>Biodiversity compensation</b> A measurable positive environmental outcome resulting from actions that are designed to compensate for residual adverse biodiversity effects <del>that cannot be otherwise managed</del> <u>after avoidance, minimisation, remediation, and biodiversity offset measures have been applied.</u>
Definition – Biodiversity offsetting	Support with amendment	Delete appropriate as it is imprecise.  Also amend to reflect the fact that we are directing a net gain outcome from the use of offsetting.	Amend definition as follows: <b>Biodiversity offsetting</b> A measurable positive environmental outcome resulting from actions designed to redress for the residual adverse effects on biodiversity arising from activities after <del>appropriate</del> avoidance, minimisation, and remediation measures

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			have been applied. The goal of biodiversity offsetting is to achieve <del>no net loss, and preferably at least a 10 percent net gain</del> of indigenous biodiversity values.
Definition - Ecological integrity	Support with amendment	Amend to align with the National Policy Statement for Indigenous Biodiversity exposure draft.	Amend definition as follows: <b>Ecological Integrity</b> <del>The full potential of indigenous biotic and abiotic features and natural processes, functioning in sustainable communities, habitats, and landscapes.</del> Means the extent to which an ecosystem is able to support and maintain its: <u>(a) composition (being its natural diversity of indigenous species, habitats, and communities); and</u> <u>(b) structure (being its biotic and abiotic physical features); and</u> <u>(c) functions (being its ecological and physical processes)</u>
Policy 29	Support with amendment	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 Policy 29 as follows: ... (d) <u>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;</u> (e) include <u>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</u> (f) <u>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.</u>
Policy 52	Support with amendment	Amendments are required to improve clarity.	Amend Policy 52 as follows: ... (c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, <del>or regionally significant infrastructure or property</del> from unacceptable risk and the works form part of a long-term hazard management strategy <u>agreed to by relevant authorities</u> , that represents the best practicable option for the future;
Method 14	Support with amendment	Amendments are required to reflect the intent of the method.	Amend Method 14 as follows: <u>Undertake research, prepare and disseminate information about natural hazards and climate change effects in order to:</u> (a) guide local authority <u>planning and</u> decision-making; and (b) raise awareness and understanding of natural hazards <u>and climate change.</u>
Objective 22	Support with amendment	This objective is drafted more in the style of a policy rather than an outcome. Amendment to the chapeau is required to address this.	Amend Objective 22 as follows: <u>Urban development, including housing and infrastructure, <del>is enabled where it</del> demonstrates the characteristics and qualities of well-functioning urban environments, which:</u> ...
Explanations for Policies CC.4, 31, 32, 33, 55, 58, UD.3, 67	Support with amendment	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 the below sentence to the explanation for Policies CC.4, 31, 32, 33, 55, 58, UD.3, 67: <u>'Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.'</u>
Policy 55	Support with amendment	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.	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 <i>urban development</i> beyond the region's <i>urban areas</i> (as at <del>March 2009</del> <u>August 2022</u> ), particular regard shall be given to whether: (a) the <del>urban proposed development is the most appropriate option to achieve</del> <u>Objective 22 contributes to establishing, improving or maintaining the qualities and characteristics of a well-functioning urban environment, including:</u> <u>(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;</u>



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		<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>(ii) the location, design and layout of the proposed development <del>shall apply</del> <u>applies</u> the specific management or protection for values or resources identified by this <u>Regional Policy Statement RPS, including by:</u></p> <p><u>1. Avoiding inappropriate Managing subdivision, use and development in accordance with the risk areas at from natural hazards as required by Policy 29;</u></p> <p>...</p> <p><u>6. Providing for climate resilience and supporting a low <del>or</del> and zero-carbon multi modal transport network consistent with Policies CC.1, CC.4, CC. <del>910</del> and CC147;</u></p> <p>...</p> <p><u>9. Protecting highly productive land for use in land-based primary production consistent with Policies 56 and 59; and</u></p> <p>...</p> <p>(d) <del>the Any urban development that</del> would provide for significant development capacity <u>as outlined in Policy UD.3,</u> regardless of if the development was out of sequence or unanticipated by growth or development strategies.</p> <p><b>Explanation</b></p> <p>...</p> <p><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>
Policy 56	Support with amendment	<p>Amendments are required to align with the National Policy Statement for Highly Productive Land 2022.</p> <p>The addition of cultural values is to incorporate feedback received on the draft RPS Change 1.</p>	<p>Amend Policy 56 as shown below:</p> <p>When considering an application for a resource consent or a change, variation or review of a district plan, in rural areas (as at <del>March 2009</del> August 2022), particular regard shall be given to whether:</p> <p>...</p> <p>(b) the proposal will reduce aesthetic, <u>cultural</u> and open space values in <i>rural areas</i> between and around settlements;</p> <p><u>(c) the proposal will lead to subdivision, rezoning to urban or rural lifestyle, use or development of highly productive land not otherwise provided for by exceptions in clauses 3.6, 3.8, 3.9 or 3.10 of the National Policy Statement for Highly Productive Land 2022;</u></p> <p><del>(d)</del> the proposals location, design or density will minimise demand for non-renewable energy resources; and</p> <p><del>(e)</del> the proposal is consistent with <u>any Future Development Strategy, or the city or district regional or local strategic growth and/or development framework or strategy that addresses future rural development, should the Future Development Strategy be yet to be released;</u> or</p> <p><del>(f)</del> in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity.</p> <p><b>Explanation</b></p> <p>...</p> <p><u>In addition to direction in Policy 59, Policy 56 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>
New definition - Highly productive land	Support with amendment	<p>A new definition is required to support submission points on Policies 55 and 56 until maps of highly productive land are operative in the RPS. The proposed submission aligns with NPS-HPL 2022 clause 3.5(7).</p>	<p>Insert new definition as shown below:</p> <p><b>Highly Productive Land</b></p> <p><u>Until highly productive land is mapped and operative in this Regional Policy Statement, highly productive land refers to land that, as of 17 October 2022:</u></p> <ul style="list-style-type: none"> <li><u>Is zoned general rural or rural production and is Land Use Capability 1, 2, or 3 land; and</u></li> <li><u>Is not identified for future urban development or subject to a Council initiated or adopted notified plan change to rezone it to urban or rural lifestyle.</u></li> </ul>
Policy UD.3	Support with amendment	<p>Amendments are required to improve readability, consistency and clarity, and reduce duplication.</p>	<p>Amend Policy UD.3 as shown below:</p> <p><b>Policy UD.3: Responsive planning to <u>unanticipated or out-of-sequence</u> developments that provide for significant development capacity – consideration</b></p>

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		<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> <p>Add 'improving' into clause (a)(i) for consistency with Policy 31.</p>	<p>When considering a change of a district plan for a development, <u>to determine whether it provides significant development capacity</u> in accordance with clause (d) of Policy 55, particular regard shall be given to whether <u>all of the following criteria <del>is-are</del> met:</u></p> <p>(a) the location, design and layout of the proposal:</p> <p>(i) contributes to establishing, <u>improving</u> or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22;</p> <p>...</p> <p>(c) <u>when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution:</u></p> <p>(i) is of high yield relative to either the forecast demand or the identified shortfall;</p> <p>(ii) <u>is likely to <del>will</del> be realised in a timely (i.e., rapid) manner, and earlier than the anticipated urban development;</u></p> <p><u>(iii) is likely to be taken up; and</u></p> <p><u>(<del>iv</del>iii) will facilitate a net increase in district-wide development uptake-up take in the short to medium term;</u></p> <p>(d) <u>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.</u></p>
Policy 67	Support with amendment	<p>Amendments are required to improve readability, consistency and clarity.</p> <p>Add 'improve' into heading and wording for consistency with Policy 31.</p>	<p>Amend Policy 67 as shown below:</p> <p><b>Policy 67: Establishing, <u>improving</u> and <del>m</del>Maintaining the qualities and characteristics of well-functioning urban environments and <del>enhancing a compact, well designed and sustainable regional form</del> – non-regulatory</b></p> <p>To establish, <u>improve</u> and maintain and enhance the qualities and characteristics of well-functioning urban environments <del>a compact, well designed and sustainable regional form</del> by:</p> <p>...</p>
Method UD.2	Support with amendment	<p>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.</p>	<p>Amend Method UD.2 as below:</p> <p>...</p> <p><u>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.</u></p>
New non-regulatory method	Support with amendment	<p>Greater Wellington considers a new non-regulatory method to support Policy CC.11 is required. This will assist with implementation of the policy.</p>	<p>Under Chapter 4.5.2 – Non-regulatory methods – information and guidance, insert a new method CC.3A as follows:</p> <p><b><u>Method CC.3A – Whole of life carbon emissions assessments</u></b></p> <p><u>Develop information to support the development of whole of life carbon emission assessments, in accordance with Policy CC.11.</u></p> <p><u>Implementation: Wellington Regional Council</u></p>
Objective CC.5, Policy CC.6, Policy CC.18, Method CC.4	Support with amendment	<p>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.</p> <p>Amendments are required to make the intent clear.</p>	<p>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.</p>
New definition - Minimise	Support with amendment	<p>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>Insert new definition as shown below:</p> <p><b><u>Minimise</u></b></p> <p><u>Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning.</u></p>

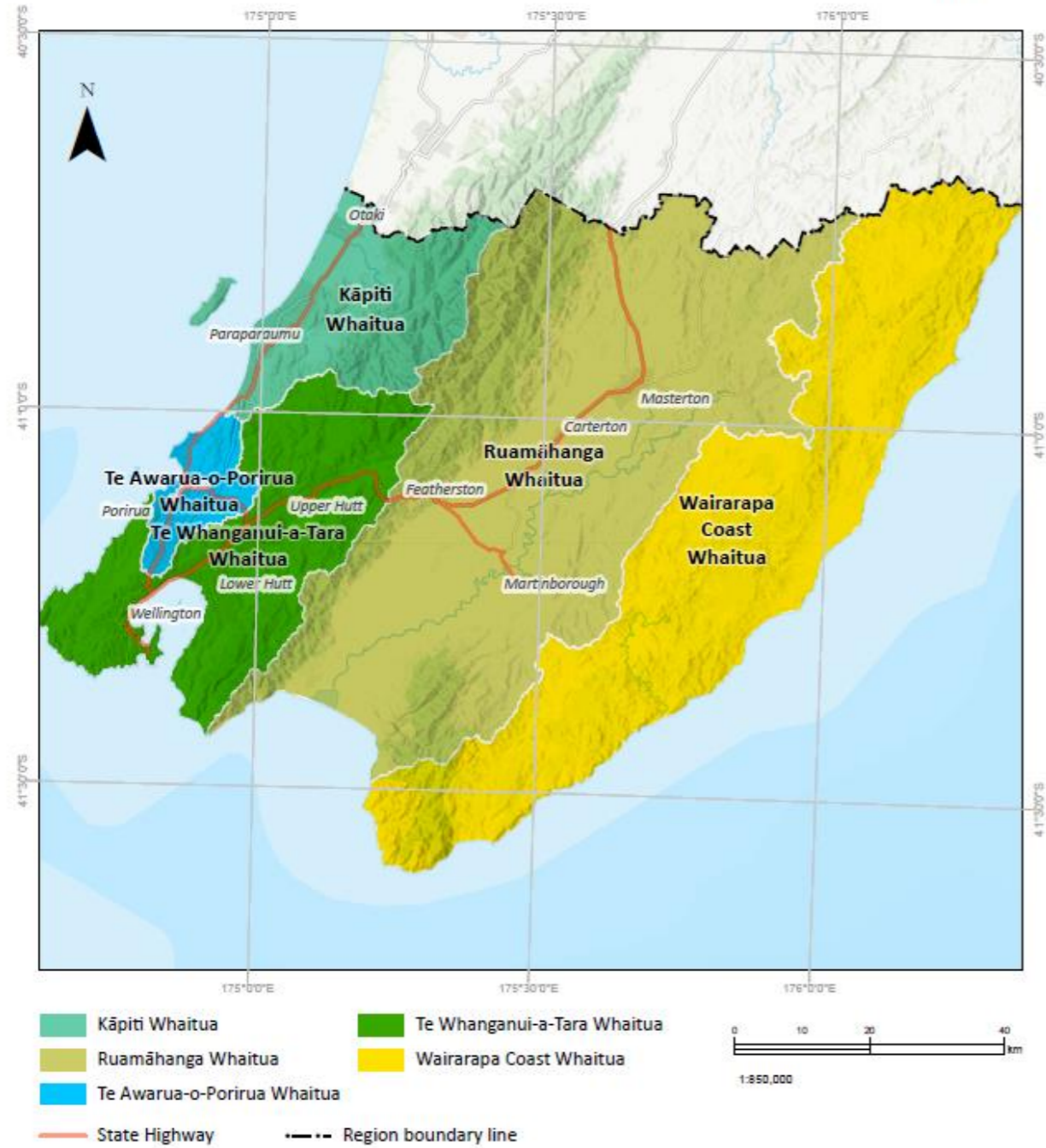
Specific provision	Position	Reasons for submission	Relief sought
Definition – Emissions	Delete	Emissions is a generic term that applies to more than just greenhouse gases, however the notified definition only refers to greenhouse gases. It would be appropriate to remove this definition and instead amend the definition for ‘greenhouse gases’ to refer to ‘greenhouse gas emissions’.	Remove definition for emissions.
Definition - Greenhouse gases	Support with amendment	Amend definition for greenhouse gases to refer to greenhouse gas emissions, to support the removal of the definition for emissions.	<b><u>Greenhouse Gases Emissions</u></b> <del>Atmospheric gases that trap or absorb heat and contribute to climate change. The gases covered by the Climate Change Response Act 2002 are</del> <u>The release of</u> carbon dioxide (CO <sub>2</sub> ), methane (CH <sub>4</sub> ), nitrous oxide (N <sub>2</sub> O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), or sulphur hexafluoride (SF <sub>6</sub> ) <u>into the atmosphere, where they trap heat or radiation and contribute to climate change.</u>



Attachment 2: Map of whaitua boundaries to be inserted in freshwater chapter introduction

## Whaitua boundaries

Map 77



This version of the map is not complete. The version of this map available online through the online web map viewer shows the complete, detailed information on a GIS overlay that is not shown on this hard copy. The online version is available on the Council's website at <https://mapping.gw.govt.nz/gwrc/> (select theme Natural Resources Plan) and can be accessed from the Council offices or public library.

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