

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S32 Director- General of Conservation	S32.021	General comments - consideration policies	Support in part	The proposed changes appropriately respond to climate change and national direction.	Retain as notified, except where specific changes are requested below.
S94 Guardians of the Bays Incorporated	S94.015	General comments - consideration policies	Support	Not stated	Retain as notified
S140 Wellington City Council (WCC)	S140.002	General comments - consideration policies	Support in part	The title of the regulatory policies as 'consideration' policies set out in chapter 4.2 creates confusion for their statutory weighting and should be amended.	Amend the wording of the title of the regulatory policies as outlined in Chapter 4.2 from 'Consideration' to 'Give particular regard'.
S158 Kāinga Ora Homes and Communities	S158.001	General comments - consideration policies	Oppose	Considers that all of the policies in Chapter 4.2 have been worded to read as assessment criteria 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.	That Chapter 4.2 is 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.
S158 Kāinga Ora Homes and Communities	S158.044	General comments - consideration policies	Not Stated / Neutral	Considers that a number of policies have been worded within the chapter to read as assessment criteria 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 Chapter 4.2 is deleted from the regional policy statement in full, however seeks that Policy UD.3 is retained with amendments and relocated to Chapter 4.1.
S163 Wairarapa Federated Farmers	S163.062	General comments - consideration policies	Oppose	The proposed amendments to regulatory policies would more properly be considered in the full review of the RPS scheduled in 2024. Additional reasons are as set out in respect of the objectives for each topic.	That the proposed amendments to Chapter 4.2 be deleted

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S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.060	General comments - consideration policies	Oppose in part	Submission in reference to Chapter Introduction and Table of Contents Chapter 4.2. The introduction (above the table) incorrectly states the weight to be given to the chapter's policies when changing or varying regional and district plans. Those plans must give effect to the RPS, not have particular regard to the RPS' provisions.	Amend as follows: This section contains the policies that need to be given particular regard, where relevant, when assessing and deciding on resource consents or notices of requirement. The policies must be given effect to or when changing, or varying district or regional plans. Within this section, policies are presented in numeric order, although the summary table below lists the policy titles by topic headings.
S170 Te Rūnanga o Toa Rangatira	S170.078	General comments - consideration policies	Not Stated / Neutral	4.2 Regulatory Policies - matters to be considered Explanations for Policy 48 (Principles of the Treaty of Waitangi) and Policy 49 (Recognising and providing for matters of significance to tangata whenua) have been removed. These are beneficial explanations which provide greater context for policies. These explanations discuss how Māori values and sites of significance should be considered. If these explanations are going to be put somewhere else there should be guidance on where to find them.	Reinstate explanations for Policy 48 (Principles of the Treaty of Waitangi) and Policy 49 (Recognising and providing for matters of significance to tangata whenua). If these explanations are going to be put somewhere else there should be guidance on where to find them.
S30 Porirua City Council	S30.0123	General comments - consideration policies	Oppose	Council opposes all "consideration" policies since they often duplicate or conflict with "regulatory" policies, and represent regulatory overreach without sufficient s32 evaluation or other evidence. We consider that they will create unnecessary regulatory costs due to the way they are drafted. They assume a level of knowledge and expertise on a range of matters generally not available to consent authorities, and in some cases represent a transfer of s31 functions to territorial authorities.	Not stated.
S16 Kāpiti Coast District Council	S16.029	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	Although Council supports the general intent of the policy, it is noted the terms consideration and particular regard shall be given requires decision makers to carry out two different actions. These terms have different meanings. Council considers it is not appropriate to have a policy titled with consideration, when the policy itself requires decision makers to have particular regard to the matters listed in the policy. Council requests this	Amend as follows: Policy IM.1: Integrated management - ki uta ki tai - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan consideration particular regard shall be given to:

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				is amended to align with how the RPS describes district plan requirements for RPS policies that must be considered by city and district councils.	(a) ...
S30 Porirua City Council	S30.056	Policy IM.1: Integrated management - ki uta ki tai - consideration	Oppose	<p>While this policy will have less or greater weight, and relevance with consents, saying that an application for a height to boundary infringement needs to have particular regard to these matters is too onerous. There should be some level of scale built in.</p> <p>In regard to clause (a), the requirement to partner with mana whenua in the development of district plans is broader than what this policy addresses. It is already a requirement of s8 of the RMA, if it is to be repeated in the RPS it should be a separate overarching policy.</p> <p>It is unclear what is meant by 'upholding Māori data sovereignty' - this term needs to be explained or defined.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users inline with objectives, including being specific about what scale of consents it should apply to.</p> <p>Amend RPS to provide a definition or explanation of 'Māori data sovereignty'.</p>
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.012	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	<p>Council supports the need to develop closer working relationships with mana whenua and the need to give effect to section 31 of the RMA in respect of integrated management, but it is difficult to achieve some of these matters at resource consent or notice of requirement level.</p> <p>Clause g) does not work for a consent or a notice of requirement so should be deleted or constrained only to plan changes.</p> <p>Council supports clause c) but there needs to be a clear relationship with practical and workable methods to achieve this.</p> <p>Support in particular d) and e), in that Council believes that it requires going to mana whenua to obtain information on what they think is important to them and for mana whenua to determine the information they choose to release.</p>	<p>Amend to define 'Data sovereignty'</p> <p>Delete clause g) or amend to exclude resource consents and notice of requirements.</p> <p>Amend to ensure methods of implementation are achievable.</p>
S86 Irrigation New Zealand	S86.004	Policy IM.1: Integrated management	Support in part	<p>Ambiguity arises within the provision of Policy IM.1 (and others), for example the use of instruction words such as 'recognising' throughout these provisions. Change 1 should define these instruction words to avoid any</p>	<p>Amend Policy IM.1 to define the instructional words that relate to giving effect to tangata whenua and Te Ao Māori. This should be done in consultation with iwi/Crown Treaty partners.</p>

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(Irrigation NZ)		nt - ki uta ki tai - consideration		interpretative asymmetry between regional councils. There is a need for consultation of a Crown and iwi partnership to ensure these instruction words are universally interpreted and adhered to by councils. This will ensure that councils uphold their obligations under the RPS Change 1 and other requirements such as the NPS- FM.	
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.026	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	Policy IM.1 be changed to a regulatory policy to align with the changes sought in Objective A.	Policy IM.1 to be changed to a regulatory policy.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.088	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	Generally supports the content of IM.1 for 'Integrated Management'. However, Policy IM.1 should be changed to 'regulatory'. This will ensure that recognising and providing for Ki uta ki tai is paramount to resource management decisions. Furthermore, mana whenua/tangata whenua should be actively involved in resource management and decision-making to directly address Issue 3 in the 'Proposed Amendment to Chapter 3'.	Amend Policy IM.3 clause (a) as follows: (a) partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua active involvement in resource management and decision making.
S115 Hutt City Council	S115.056	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	<p>While we support the general intent of the policy, these are high level considerations and do not specify the situations where particular action should be taken. This is inevitable given the scale of a Regional Policy Statement and the wide range of situations it must cover.</p> <p>Other than clause (e), which we comment on below, we support the policy in its application to notices of requirement and district plans. District plans are the appropriate place to set policies and rules that provide thresholds for different matters to be considered in resource consents.</p> <p>In relation to clause (e), which covers Māori data sovereignty, while we appreciate the importance of this issue it was not included in the draft proposal on which officers provided feedback. We are not equipped in the</p>	<p>Amend Policy IM.1 as follows: "Policy IM.1: Integrated management - ki uta ki tai - consideration When considering an application for a resource consent, a notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be given to: (a) partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua involvement in resource management and decision making; and (b) recognising the interconnectedness between air, freshwater, land, coastal marine areas, ecosystems and all living things - ki uta ki tai; and (c) recognising the interrelationship between natural</p>

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				<p>time available to make meaningful input on how policy relating to Māori data could work.</p> <p>Hutt City Council is currently doing internal work on a data ethics policy, but it is too soon to include this in a regulatory method in the RPS. Council seeks further engagement with the regional council, tangata whenua/mana whenua, and the community on this matter.</p> <p>Accordingly we oppose clause (e) and seek its deletion, and this matter be pursued through a separate RPS change at a later date if found necessary after meaningful engagement.</p>	<p>resources and the built environments; and (d) making decisions based on the best available information, improvements in technology and science, and mātauranga Māori; and (e) upholding Māori data sovereignty; and (f) requiring Māori data and mātauranga Māori to be interpreted within Te Ao Māori; and (g) recognising that the impacts of activities may extend beyond immediate and directly adjacent area, and beyond organisational or administrative boundaries</p> <p>Explanation This policy requires that a holistic, integrated view is taken when making resource management decisions. It also requires both regional and district councils to provide for mana whenua / tangata whenua are actively involved in in resource management and decision making, including the protection of mātauranga Māori and Māori data."</p>
S128 Horticulture New Zealand	S128.037	Policy IM.1: Integrated management - ki uta ki tai - consideration	Support in part	Support a more consistent and efficient approach to resource management that includes partnership with mana whenua / tangata whenua. HortNZ's support this being focused on the plan-making level and governance, so that values inform the plan approach. In respect to consent applications, this clause needs to be appropriate to the size/scale/significance of the consent.	Consider providing further clarification in respect to partnering with mana whenua / tangata whenua at the consenting level.
S131 Ātiawa ki Whakaron	S131.080	Policy IM.1: Integrated	Support	Ātiawa supports Policy IM.1. Ātiawa is pleased that the drafting supports Te Tiriti; the policy principally recognises and upholds	Retain as notified.

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gotai Charitable Trust		managem nt - ki uta ki tai - considerati on		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.	
S133 Muaūpoko Tribal Authority	S133.052	Policy IM.1: Integrated managem nt - ki uta ki tai - considerati on	Support	Supports the inclusion of policies that reflect requirements for integrated management.	Retain as notified.
S140 Wellington City Council (WCC)	S140.057	Policy IM.1: Integrated managem nt - ki uta ki tai - considerati on	Support	Support as proposed.	Retained as notified.
S147 Wellington Fish and Game Council	S147.063	Policy IM.1: Integrated managem nt - ki uta ki tai - considerati on	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S163 Wairarapa Federated Farmers	S163.063	Policy IM.1: Integrated managem nt - ki uta ki tai - considerati on	Oppose	As set out in our reasons in respect of amendments to Chapter 3 - over-arching issues and objectives. The reference to "partner" is not supported for the reasons set out in Policy 12.	That Policy IM.1 be deleted Delete the FW icon.
S165 Royal Forest and Bird	S165.061	Policy IM.1: Integrated managem nt - ki uta ki tai - considerati on	Support		Retain

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Protection Society of New Zealand Inc. (Forest & Bird)		nt - ki uta ki tai - considerati on			
S167 Taranaki Whānui	S167.096	Policy IM.1: Integrated managem ent - ki uta ki tai - considerati on	Support in part	Taranaki Whānui support policy direction.	Amend clause (d) 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; and
S170 Te Rūnanga o Toa Rangatira	S170.047	Policy IM.1: Integrated managem ent - ki uta ki tai - considerati on	Support in part	The policy ensures the involvement of mana whenua in resource management and decision making. It incorporates a more holistic view of the environment and its interconnectedness. There might need to be further clarification that making decisions based on mātauranga Māori need to be informed by mātauranga Māori knowledge holders. In terms of sharing data and information across all relevant agencies it should be specified that mātauranga Māori data sovereignty will be upheld, and Māori decide when their knowledge is shared.	Add further clarification that making decisions based on mātauranga Māori need to be informed by mātauranga Māori knowledge holders, and that in terms of sharing data and information across all relevant agencies mātauranga Māori data sovereignty will be upheld, and Māori decide when their knowledge is shared.
S170 Te Rūnanga o Toa Rangatira	S170.066	Policy IM.1: Integrated managem ent - ki uta ki tai - considerati on	Not Stated / Neutral	How does this Policy and its consideration work in the greater context for the Regional Policy Statement?	Clarify in the provision how this will work in the context of the wider RPS.
S16 Kāpiti Coast District Council	S16.030	Policy IM.2: Equity and inclusivene ss -	Oppose	The policy is not supported by any provisions of the RMA or higher- level statutory planning document. Council is also concerned that the proposed policy contradicts itself by stating it is a policy that must be considered, but then requires decision makers to have particular regard to all objectives and policies in the	Delete Policy IM.2.

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		consideration		RPS - many of which must be given effect to, while others are only to be considered.	
S25 Carterton District Council	S25.035	Policy IM.2: Equity and inclusiveness - consideration	Oppose	CDC seeks further guidance on how this should be implemented in an RMA framework.	Further guidance provided by GWRC on how this should be given effect to.
S30 Porirua City Council	S30.057	Policy IM.2: Equity and inclusiveness - consideration	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation, directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concerns include:</p> <ul style="list-style-type: none"> • It does not achieve the purpose of the RMA. The purpose is to promote the sustainable management of natural and physical resources. This is to be done in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while meeting the three environmental bottom lines set out in s5 to the RMA. The purpose does not require that this is done in an equitable or inclusive way. • It does not identify how potential tensions between having to give effect to other objectives and policies of the RPS and ensuring an "equitable and inclusive way" are to be reconciled if they arise. • It requires a common understanding and agreed baseline on what existing inequities exist. Without this it cannot be determined when a resource consent, variation or plan change would exacerbate an existing inequity. There are examples of inequities, but not an exclusive list. This could be construed very broadly to address social inequities that are well beyond the ability of any RMA decision to address. This needs to be more clear, certain and defined to avoid legal challenges on things that cannot be managed through the RMA. • Regional council or territorial authorities cannot manage access to public transport, amenities and housing through a resource consent or a plan change. 	Delete policy.

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				<p>This is quite a step change to be requiring a council through a consent to consider how a housing development in one area for example is not exacerbating lack of access to housing in another.</p> <ul style="list-style-type: none"> • There is no definition of "environmental issues" provided for this policy. The definition of "environment" in the RMA is broad and includes all natural and physical resources, amenity values, ecosystems and their constituent parts. <p>This needs to be more certain, including specifying the degree to which "environmental issues" should not be exacerbated.</p> <ul style="list-style-type: none"> • The requirement not to exacerbate "environmental issues" is both uncertain and draconian given the RMA broad definition of "environment" and lack of any policy guidance on what an "issue" is nor any direction of degree of exacerbation to be considered before a resource consent, variation or plan change would fail this test. • Section 5 of the RMA requires that the needs of future generations are met, so "not increasing the burden" could be seen as a lower bar. However, the policy does not provide any direction on guidance on what is meant by "burden" in clause (d), burden of what exactly? This needs to be more clear and certain. • Unlike IM.1, this refers to just notified consents. It is unclear why there is a discrepancy between notified and non-notified consents in these policies. 	
<p>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</p>	<p>S34.011</p>	<p>Policy IM.2: Equity and inclusiveness - consideration</p>	<p>Oppose in part</p>	<p>This policy reads more like an overarching objective or policy.</p> <p>Council supports clause a) but is concerned that clauses b) to d) may be difficult to achieve, particularly at a resource consent level.</p> <p>The language here is also very strong, which sets a high bar, and there are no measures to determine how you would know that these lists of matters were not being met. As an example, the location of development could have an impact on access to public transport if connections are severed or not properly planned. However, access is also related to service provision,</p>	<p>Amend to be an overarching objective or policy, and amend to read: Policy / Objective IM.2 XX: Equity and inclusiveness - consideration When considering an application for a notified resource consent, a notice of requirement, or a change, variation or review of a regional and district plan particular regard shall be given to achieving the objectives and policy outcomes of this RPS in an equitable and inclusive way, by: (a) avoiding addressing compounding</p>

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				<p>which is a regional council function, and regional and district plans have no control over the implementation or withdrawals of public transport services.</p> <p>Clause b) is open to much interpretation that would also be difficult to evidence at a resource consent level.</p> <p>Clause c) would not require if the policy becomes an overarching objective/policy as this is already covered by other provisions in the RPSPC1.</p> <p>Under clauses c) and d) it is unclear what the environmental issues and burdens are that this provision is seeking to address. There may also be circumstances where acting in a way that is not considered equitable, could reduce a future burden.</p> <p>The provisions should more accurately reflect the purpose of the RMA.</p>	<p>historic grievances with iwi/Māori; and (b) not exacerbating existing addressing social inequities, in particular but not limited to, access to public transport, amenities and housing; and (c) not exacerbating environmental issues; and (d) not increasing the burden on supporting the sustainable management of resources for future generations.</p> <p>Explanation This policy requires that equity and inclusiveness are at the forefront of resource management and decision-making to prevent any increase in existing inequities, to ensure intergenerational equity, and to improve the overall wellbeing of people and communities.</p>
S100 Meridian Energy Limited	S100.017	Policy IM.2: Equity and inclusiveness - consideration	Oppose	<p>There are so many expressions within Policy IM.2 that are ambiguous or undefined (for example: 'equitable', 'inclusive', 'historic grievances', 'existing inequities', 'environmental issues', 'burden') that the policy is incapable of reasonable or consistent application. Policy IM.2 is not supported by any meaningful section 32 evaluation.</p>	Delete Policy IM.2 and the accompanying explanation.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.027	Policy IM.2: Equity and inclusiveness - consideration	Support in part	<p>Policy IM.1 be changed to a regulatory policy to align with the changes sought in Objective A. This is pertinent given that Māori landowners have historically been disadvantaged within the resource management system and decision-making processes. Therefore, the policy should be regulatory to prevent further inequities. This change will directly address issue 3 in the 'Proposed Amendment to Chapter 3'.</p>	Policy IM.2 be changed to a regulatory policy.
S115 Hutt City Council	S115.057	Policy IM.2: Equity and inclusiveness	Oppose	<p>While we appreciate the intent of the policy, the matters it addresses are generally not resource management considerations for city and district councils as they cannot be addressed through controlling land use or</p>	<ul style="list-style-type: none"> • Delete Policy IM.2, or failing that, • Amend the policy so that it does not apply to resource consents, or failing that, • Amend the policy to set situations and thresholds for

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		ss - consideration		subdivision. The policy is also not supported by any higher order document or provision in the RMA. If the policy is included, it is also insufficiently clear for assessing resource consents about what situations it applies to, the threshold of significance, and what matters should be considered.	which this assessment should apply.
S129 Waka Kotahi NZ Transport Agency	S129.005	Policy IM.2: Equity and inclusiveness - consideration	Support in part	Support that equity, inclusiveness and access to suitable travel choices is important.	Insert new methods to articulate how equity, inclusiveness and access be provided.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.081	Policy IM.2: Equity and inclusiveness - consideration	Support	Ātiawa supports ensuring that resource management creates fair and equitable outcomes and avoids exacerbating inequalities.	Retain as notified.
S133 Muaūpoko Tribal Authority	S133.053	Policy IM.2: Equity and inclusiveness - consideration	Support	Supports the inclusion of policies that reflect requirements for integrated management.	Retain as notified.
S134 Powerco Limited	S134.013	Policy IM.2: Equity and inclusiveness - consideration	Oppose	There is significant uncertainty in the wording of policy IM.2 and how many of the terms might be interpreted in any given situation. For example, it is unclear how this may be applied in a situation where consent is required for maintenance or upgrade of existing regionally significant infrastructure located in an environmentally or culturally sensitive area. The policy should be deleted on the basis of uncertainty and an inability to apply on a consistent basis	Delete Policy IM.2 in its entirety.
S140 Wellington City Council (WCC)	S140.058	Policy IM.2: Equity and inclusiveness -	Support in part	While we understand the intent of the policy, it is uncertain how this will be implemented within the current resource management considerations for city and district councils without further clarification.	Clarify and refine intent and wording of Policy IM.2

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		consideration			
S147 Wellington Fish and Game Council	S147.064	Policy IM.2: Equity and inclusiveness - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S148 Wellington International Airport Ltd (WIAL)	S148.014	Policy IM.2: Equity and inclusiveness - consideration	Oppose in part	Considered 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.	Delete this policy.
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.016	Policy IM.2: Equity and inclusiveness - consideration	Oppose	There is significant uncertainty in the wording of policy IM.2 and how many of the terms might be interpreted in any given situation. For example, it is unclear how this may be applied in a situation where consent is required for maintenance or upgrade of existing regionally significant infrastructure located in an environmentally or culturally sensitive area. The policy should be deleted on the basis of uncertainty and an inability to apply on a consistent basis.	Delete Policy IM.2 in its entirety.
S163 Wairarapa Federated Farmers	S163.064	Policy IM.2: Equity and inclusiveness - consideration	Oppose	The purpose and principles of the RMA do not require considerations of 'equity' or 'inclusiveness' when considering plan changes or resource consent applications; and would practically be unworkable, especially at the level of resource consents. Refer to submission for more details.	That Policy IM.2 be deleted. Delete the FW icon.
S165 Royal Forest and Bird Protection Society of New Zealand Inc.	S165.062	Policy IM.2: Equity and inclusiveness - consideration	Support		Retain

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(Forest & Bird)					
S167 Taranaki Whānui	S167.097	Policy IM.2: Equity and inclusiveness - consideration	Support	Taranaki Whānui supports the new Policy IM.2 and note the development of Methods are still to come.	Retain as notified.
S170 Te Rūnanga o Toa Rangatira	S170.088	Policy IM.2: Equity and inclusiveness - consideration	Not Stated / Neutral	Policy CC.9 Equity and inclusiveness - consideration This clause should apply all policy in the RPS, not just to Climate Change parts. Inter-racial and inter-generational equity is impacting iwi and Mana Whenua differently as far as Climate Change impacts.	This clause should apply all policy in the RPS, not just to ClimateChange parts. It should also be recognised that inter-racial and inter-generational equity is impacting iwi and Mana Whenua differently as far as Climate Change impacts.
S16 Kāpiti Coast District Council	S16.022	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Oppose	We note district plans and decisions under them have no ability to have particular regard to whether subdivision, use and development have been planned to optimise overall transport demand, or maximise mode shift from private vehicles to public transport or active modes in a way that contributes to reducing greenhouse gas emissions. We are confused as to why GWRC would consider this an appropriate policy compared to other more effective and appropriate methods to achieve the desired greenhouse gas emission reductions. We do not consider the RPS or district plans to be effective or appropriate resource management tools to achieve the stated goals. Council also notes the policy suffers from the same contradiction as other consideration policies, where the policy wording also requires particular regard to be had. These verbs have very different meanings under the RMA.	Delete Policy CC.9 or alter its applicability so it is only relevant to regional plans and decisions under regional plans.
S30 Porirua City Council	S30.058	Policy CC.9: Reducing greenhouse gas emissions associated	Oppose	The policy lacks the necessary precision to enable its meaningful implementation, directs district plans to address matters which are outside their scope, and due to its drafting and scope represents a high regulatory requirement. Issues of concern include:	Delete policy. ORAlternatively, amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and ensures the requirements are within the scope of what a district plan can achieve. Amend policy to only apply to resource consents.

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		with transport infrastructure - consideration		<ul style="list-style-type: none"> • 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 would trigger this policy. • It is unclear what is meant by "optimise overall transport demand", this policy needs greater clarity to allow it to be implemented. • Relief sought in relation to Policy CC.2 applies equally in relation to Policy CC.9. • This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans. 	
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.032	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	<p>Council supports the intent of this policy but considers that district plans, and in particular resource consents and notice of requirements cannot achieve this, particularly in relation to optimising travel demand and influencing travel choice and ensuring public transport service provision, given public transport is a regional function.</p> <p>It is also unclear what is meant by optimising travel demand.</p> <p>As with other policies there is also an issue of significance of scale. As an example, it is inappropriate for alterations of buildings to have particular regard to this.</p> <p>The NPS-UD already directs that district plans cannot require parking standards, the effects of which are yet to be fully identified.</p>	Amend to read: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and development have been planned to optimise overall transport demand, maximising mode shift from private vehicles to public transport or active modes, in a way that contributes to reducing greenhouse gas emissions
S79 South Wairarapa District Council	S79.039	Policy CC.9: Reducing greenhouse gas emissions associated with transport	Support in part	<p>SWDC supports the approach in principle, but are of the view that this is more achievable by the tier 1 Council's in the region that receive significant investment in public transport. SWDC still wish to support the approach to a degree that is practicable in its context. However, this may be of a significantly smaller scale than the policy intends. Matters such as the application of good urban design principles for connectivity, walkability and cyclability for able bodied</p>	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 development have been planned to optimise overall transport demand, maximising mode shift from private vehicles to public transport or active modes, in a way that contributes to reducing greenhouse gas emissions where practicable.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		infrastructure - consideration		residents and suitable street furniture are the most probable extents that can be applied in our context.	Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought.
S82 Jonathan Markwick	S82.006	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Support policy to enforce emissions reductions through mode-shift.	Retain as notified.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.020	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.
S115 Hutt City Council	S115.058	Policy CC.9: Reducing greenhouse gas emissions associated with	Support in part	While we support the intent of the policy, this assessment is not feasible in relation to individual resource consent applications.	<ul style="list-style-type: none"> Remove the requirement to undertake this assessment for individual resource consent applications. Include a definition of 'optimise' within RPS Change 1.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		transport infrastructure - consideration			
S118 Peka Peka Farm Limited	S118.008	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Oppose	The policy lacks clarity to enable its meaningful implementation.	Delete Policy CC.9.
S129 Waka Kotahi NZ Transport Agency	S129.010	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	Supports the reduction of greenhouse gases which align with direction from Central Government as it becomes available.	Seeks alignment with the direction of Central Government.
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.082	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure -	Support	Ātiawa supports reducing greenhouse gas emissions from transport by ensuring that resource consent for subdivision, use and development are designed in a way that optimise travel demand and maximise modal shift (from private vehicles to public transport and active modes). We support development centred around public transport hubs and walkable catchments. However, the scale of that development	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration		needs to planned and delivered in a way that recognises the rangatiratanga of hapū and iwi in relation to their land and waterways, and how this can be exercised to better manage the sustainable use of these resources.	
S133 Muaūpoko Tribal Authority	S133.042	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S137 Greater Wellington Regional Council (GWRC)	S137.009	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	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.
S140 Wellington City Council (WCC)	S140.059	Policy CC.9: Reducing greenhouse gas emissions	Oppose	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. Similarly to Policy CC.2, as it will likely be implemented at a local scale, there is the risk of missing region-wide	Delete Policy CC.9

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		associated with transport infrastructure - consideration		pressures... and planning for reducing emissions will need to be done at a regional scale to achieve optimal results and reduce cross-boundary pressures	
S142 Combined Cycle Submitters (CCS)	S142.004	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Supports these two policies. We consider that they provide appropriately clear direction which aligns the RPS with the approach to mode shift and climate mitigation in relevant non-statutory documents and regional commitments.	Retain as notified.
S148 Wellington International Airport Ltd (WIAL)	S148.025	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Oppose in part	As set out above it may take some time to develop the strategies that are necessary to address emissions in the airport and aviation sector. It would therefore be inappropriate if this policy were to extend to air transportation.	Amend this policy so that it is clear that it does not apply to the airport and aviation industry, or delete
S163 Wairarapa Federated Farmers	S163.065	Policy CC.9: Reducing greenhouse gas emissions associated with transport	Oppose	This policy is inappropriate for rural production and rural living areas where public transport or 'active modes' are non-existent. Requiring this policy to apply to such land would serve no purpose other than to require additional assessment for these matters that would produce the same conclusion i.e., that public transport or 'active modes' are non-existent or impractical in rural areas.	That Policy CC.9 be deleted.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		infrastructure - consideration			
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.063	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	The intent of this policy is supported in that it directs reduction; however it needs to contain stronger direction and link to achieving the specific reductions sought in Objective CC.3.	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 ensure 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 achieves the greenhouse gas emission targets in Objective CC.3. contributes to reducing greenhouse gas emissions-
S166 Masterton District Council	S166.049	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support in part	Supportive in principle but would like to know how this intends to be applied to provincial areas with significant rural roading networks.	Retain as notified. However: More clarity on this policy required.
S167 Taranaki Whānui	S167.098	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure -	Support in part	Lower-decile areas (including Māori) have been historically disadvantaged by the public transport system. Taranaki Whānui supports the principle of new Policy CC.9 but again would like to see stronger protection for lower-decile areas (including Māori). Suggest a sub-part which ensures a focus on equity of access or a cross reference.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S170 Te Rūnanga o Toa Rangatira	S170.064	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Not Stated / Neutral	Policy CC.9 Equity and inclusiveness - consideration This clause should apply all policy in the RPS, not just to Climate Change parts. Inter-racial and inter-generational equity is impacting iwi and Mana Whenua differently as far as Climate Change impacts.	This clause should apply all policy in the RPS, not just to Climate Change parts. It should also be recognised that inter-racial and inter-generational equity is impacting iwi and Mana Whenua differently as far as Climate Change impacts.
S168 Rangitāne O Wairarapa Inc	S168.0118	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Rangitāne o Wairarapa support the enabling of infrastructure that supports the uptake of zero and low carbon multi-modal transport, that contributes to reducing GHG emissions through district plans. Requiring consideration of transport demand optimisation, and maximising transport mode shift away from private vehicles in planning decisions is also supported.	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0170	Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure - consideration	Support	Rangitāne o Wairarapa support the enabling of infrastructure that supports the uptake of zero and low carbon multi-modal transport, that contributes to reducing GHG emissions through district plans. Requiring consideration of transport demand optimisation, and maximising transport mode shift away from private vehicles in planning decisions is also supported.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S16 Kāpiti Coast District Council	S16.023	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	<p>The intent of the policy to provide regional direction on the consideration of new freight distribution centres is useful and Council supports this.</p> <p>Council notes the policy suffers from the same contradiction as other consideration policies, where the policy wording also requires particular regard to be had. These verbs have very different meanings under the RMA. We request an amendment to address this.</p>	Amend Policy CC.10 as follows: Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan for freight distribution centres and new industrial areas or similar activities with significant freight servicing requirements, particular regard consideration shall be given to the proximity of efficient transport networks and locations that will contribute to efficient freight movements and minimising associated greenhouse gas emissions.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.033	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	These matters, especially new industrial areas, are also most appropriately dealt with at a plan change or variation scale.	Amend policy to read: "When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan for freight distribution centres and new industrial areas or similar activities with significant freight servicing requirements, particular regard shall be given to the proximity of efficient transport networks and.."
S83 CentrePort Limited	S83.003	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	The submitter supports the protection of strategic freight network locations to enable carbon efficiency	Retain as notified. However, potential further emphasis on identifying and protecting strategic locations for freight movement facilities
S102 Te Tumu Paeroa 	S102.021	Policy CC.10: Freight	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Office of the Māori Trustee		movement efficiency and minimising greenhouse gas emissions - consideration			
S115 Hutt City Council	S115.059	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	While we support direction on this issue to inform zoning decisions for the appropriate location for freight distribution facilities and industrial areas, this assessment is not feasible in relation to individual resource consent applications.	Remove the requirement to undertake this assessment for individual resource consent applications.
S129 Waka Kotahi NZ Transport Agency	S129.014	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	Supports efficiency of freight movements and recognises the contribution this has in the minimisation of greenhouse gas emissions.	Requests to be involved in further discussions about the drafting Policy CC.10 and the methods to implement this direction.
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.083	Policy CC.10: Freight movement efficiency and minimising greenhouse gas	Support	While Ātiawa acknowledges the Regional Council's views on freight distribution centres and their proximity to efficient transport networks, Ātiawa is concerned that there could be adverse affects on mana whenua values from their construction in our rohe. Ātiawa seeks active involvement in decision-making to avoid adverse outcomes for mana	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		emissions - consideration		whenua and our relationship with our culture, traditions, ancestral lands, water, sites, wāhi tapu and other taonga in the development of new freight distribution centres and new industrial areas. .	
S133 Muaūpoko Tribal Authority	S133.043	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S140 Wellington City Council (WCC)	S140.060	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Oppose	Applying this consideration to resource consents and notices of requirement will result in unnecessary bureaucracy. Freight servicing developments already look for transport networks and freight movements that are efficient, because this is critical to their business. Greenhouse gas emission reductions for freight businesses are far more effective through tools such as ETS placing costs on fuel, incentives for alternative fuels, etc. This can be a relevant consideration for plan changes that enable freight activities, for example where to zone a new industrial area. However, this is included in Policy CC.9 above.	Delete Policy CC.10.
S148 Wellington International Airport Ltd (WIAL)	S148.026	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions -	Oppose in part	WIAL submits that the intention of this policy is somewhat unclear. The Airport is a major distributor of freight for the region and it is not clear how this policy would impact on its operations in this regard.	Amend this policy so that it is clear that it does not apply to the airport and aviation industry, or delete.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.064	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	This policy should contain stronger direction and link to achieving the specific reductions sought in Objective CC.3.	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 for freight distribution centres and new industrial areas or similar activities with significant freight servicing requirements, particular regard shall be given to ensure the proximity of efficient transport networks and locations that will contribute to efficient freight movements in a way that achieves the greenhouse gas emission targets in Objective CC.3 and minimising associated greenhouse gas emissions.
S166 Masterton District Council	S166.050	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	Supportive in principle but would like more information on how it would work practically with some of our main trucking industries (especially stock moving and log hauling).	Retain as notified However: More clarity on this policy required.
S167 Taranaki Whānui	S167.099	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support in part	Taranaki Whānui supports the principle of new Policy CC.10 but wants to see protections in place for mana whenua values.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S168 Rangitāne O Wairarapa Inc	S168.0124	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions - consideration	Support	Rangitāne o Wairarapa support the requirement to consider the proximity of efficient transport networks for freight distribution centres or new development which will generate significant freight servicing requirements, to optimise freight movement and reduce GHG emissions.	Retain as notified.
S16 Kāpiti Coast District Council	S16.024	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose	<p>Council opposes Policy CC.11 in its entirety on the basis it will simply add unnecessary cost to transport infrastructure applications without any real-world benefits in the form of greenhouse gas reductions.</p> <p>As an example, a notice of requirement or resource consent application for a new road is unlikely to present any practicable options to reduce transport-related greenhouse gas emissions. Council notes greenhouse gas emissions come from the vehicles using the transport network rather than from the transportation infrastructure. Decisions on resource consents, resource consents, and district plans cannot determine the greenhouse gas emissions of the vehicles that will use the transport infrastructure. Council appreciates this policy may be more applicable to regional council functions with respect to the provisions of public transport infrastructure, and on this basis, amendments are requested to ensure the policy relevant only to regional council plans and decisions.</p>	Amend Policy CC.11 so it only applies to regional plans and other relevant regional council functions and decisions.
S30 Porirua City Council	S30.059	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose	<p>Council opposes policy as it is simply encouraging information be included in Assessments of Environmental Effects for resource consents and supporting information for RMA plans. Issues of concern include:</p> <ul style="list-style-type: none"> • It is unclear how this relates to a plan change/variation/review - the term "submitted with an application" suggests that the intention was for this policy to apply to resource consents. • The policy or method needs to clarify what type and 	<p>Delete policy. OR</p> <p>Alternatively, amend policy to be a non-regulatory method, and ensure that it provides clear and appropriate direction to plan users in line with objectives.</p> <p>If the term "whole-of-life carbon emissions assessment" is to be retained, it needs to be defined.</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>scale of infrastructure would trigger this encouragement since as drafted it would apply to anything from a new EV point or a new bus stop up to a new Motorway. Without a scaled approach to a Whole of life carbon assessment, or tools that planners can use to conduct one, its application would be inconsistent at best and useless at worst.</p> <ul style="list-style-type: none"> • It should only come into effect after the regional council has published guidance and an appropriate methodology for identifying and measuring the total volume of greenhouse gases emitted at different stages of a project lifecycle. Territorial authorities do not have the necessary expertise to review and test a carbon emissions assessment. • A whole of life carbon emissions assessment is a method to implement the policy. There is no definition of what a whole of life carbon emissions assessment is. If this term is to be retained, then it needs to be defined. 	
<p>S31 Robert Anker</p>	<p>S31.024</p>	<p>Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration</p>	<p>Oppose in part</p>	<p>It is highly questionable as to whether such an exercise has been undertaken for GWRC EV bus fleet. If such an assessment has been done then GWRC should include it in the RPS document as an example of how such a calculation should be presented and subjected to peer review.</p>	<p>GWRC to include the whole of life carbon emissions assessment calculation for its EV bus fleet as an example of what is being required.</p>
<p>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</p>	<p>S34.034</p>	<p>Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration</p>	<p>Oppose</p>	<p>This will place unnecessary and additional burdens on Councils including consent processes and does not consider scale.</p> <p>'Altered infrastructure' is an all-inclusive term can range from a change from a roundabout to traffic lights to significant road widening.</p> <p>It is also unclear how a policy that 'encourages' an action can be classified as a regulatory policy.</p> <p>Councils have no control over the end user of the infrastructure beyond enabling mode shift through, for example, the provision of cycle lanes and the operation</p>	<p>Delete provision in its entirety or amend to provide non-regulatory guidance.</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>of transport infrastructure is a function of the road controlling authority and not district plans.</p> <p>It is noted that around 51% of transport funding comes from Waka Kotahi, which has its own investment prioritisation method including criteria to assess effects on climate change. It is not considered necessary or appropriate to duplicate or conflict with this (or future) Waka Kotahi assessment processes.</p>	
S62 Philip Clegg	S62.023	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support in part	Requests an example of a whole of life carbon assessment to assist people with their preparation. The assessment that GWRC prepared for its EV bus fleet would be an excellent example.	Insert an example of a whole of life carbon assessment (such as the EV bus fleet example) into the RPS or as part of non-regulatory guidance to assist with the preparation of such assessments.
S96 Sarah (Dr) Kerkin	S96.019	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support in part	Requests an example of a whole of life carbon assessment to assist people with their preparation. The assessment that GWRC prepared for its EV bus fleet would be an excellent example.	Insert an example of a whole of life carbon assessment (such as the EV bus fleet example) into the RPS or as part of non-regulatory guidance to assist with the preparation of such assessments.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.022	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.
S115 Hutt City Council	S115.060	Policy CC.11: Encouraging	Oppose	This assessment is better conducted as part of funding and design decisions made by transport infrastructure providers. By the time a consent application is made,	Delete Policy CC.11

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		g whole of life carbon emissions assessment - consideration		there is little meaningful action possible to affect whole of life emissions other than to decline a proposal. These assessments should be undertaken in the earlier stages of a proposal, before reaching the RMA stage.	
S118 Peka Peka Farm Limited	S118.009	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Oppose	The policy encourages a whole of life carbon emissions assessment for all new or altered transport infrastructure. The policy is unclear as to the level of infrastructure that would trigger its requirement, as given the policy wording 'encourages' the provision of the information, it will be open to dispute.	Delete Policy CC.11.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.084	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support in part	Ātiawa supports ensuring that carbon emission assessments are considered in the whole-of-life context to assess the environmental impact of new and altered transport infrastructure. Ātiawa seeks that stronger wording be applied to this policy, rather than the word 'encourage' which could be interpreted an optional part of a resource consent application. Considering greenhouse gases from transport represent the largest contribution (39%) to emissions in the region, the Regional Council should go further to ensure that these assessments are required as part of the consent application.	Amend to: Policy CC.11: Encouraging Whole of life carbon emissions assessment - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, a whole of life carbon emissions assessment is required encouraged for all new or altered transport infrastructure as part of the information submitted with the application. This information will assist with evaluating the potential greenhouse gas emissions, options for reducing direct and indirect greenhouse gas emissions and whether the infrastructure has been designed and will operate in a manner that contributes to the regional target for a reduction to transport-related greenhouse gas emissions.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S133 Muaūpoko Tribal Authority	S133.044	Policy CC.11: Encouragin g whole of life carbon emissions assessmen t - considerati on	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S133 Muaūpoko Tribal Authority	S133.045	Policy CC.11: Encouragin g whole of life carbon emissions assessmen t - considerati on	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S140 Wellington City Council (WCC)	S140.061	Policy CC.11: Encouragin g whole of life carbon emissions assessmen t - considerati on	Support in part	The title should be clear that this applies to transport infrastructure, however the policy itself is supported to add rigour to greenhouse gas emission assessments of transport projects and encourage new and more efficient low-carbon technologies More consideration needs to be made for the implementation of this policy to try and ensure that basing a policy off modelling where numbers could change with technology will not end in a situation similar to Nutrient Management and the use of Overseer.	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.
S148 Wellington Internation al Airport Ltd (WIAL)	S148.027	Policy CC.11: Encouragin g whole of life carbon emissions assessmen t - considerati on	Oppose in part	As set out above technological changes and advances are evolving in the aviation sector to address emissions and it is difficult to prepare a "whole of life carbon emission assessment" which will be fixed at a certain point in time. The industry needs sufficient flexibility to adapt to new technology and respond to climate change. It would be inappropriate for this policy to require Wellington Airport and its operators to prepare a whole of life carbon emission assessment when technology and the industry is rapidly	Delete this policy or make it clear that it does not apply to Wellington International Airport and aviationindustry.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				changing. In addition, this type of assessment is not appropriate for notices of requirements where long term development is contemplated and details of specific projects are not yet known.	
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.065	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support		Retain
S166 Masterton District Council	S166.051	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Not Stated / Neutral	More clarity is required on this policy.	MDC asks that it is part of developing this assessment.
S167 Taranaki Whānui	S167.0100	Policy CC.11: Encouraging whole of life carbon emissions assessment - consideration	Support	Taranaki Whānui supports the new Policy CC.11	Retain as notified.
S16 Kāpiti Coast District Council	S16.025	Policy CC.12: Protect, enhance and restore ecosystems that	Oppose	If the identification of specific nature-based solutions is an exercise GWRC wishes to undertake, whilst Council does not oppose its concept, Council notes it is not supported by the RMA or any higher- level statutory planning document. Council requests the policy is either deleted entirely or amended so it is only applicable to regional councils. Council does not consider the	Delete Policy CC.12 entirely or amend so it is only applicable to regional councils.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		provide nature-based solutions to climate change - consideration		approach can be justified under section 32 for inclusion in a district plan.	
S30 Porirua City Council	S30.060	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	<p>Council opposes Policy CC.12 and seeks its deletion for the following reasons:</p> <ul style="list-style-type: none"> • This policy is unclear as to its intent and how it is supposed to be engaged for resource consents, plan changes/variations or reviews. • It relies on definitions for "nature-based solution", "climate change adaptation" and "climate change mitigation" which lack the necessary specificity, certainty and clarity required for terms used in a RMA regulatory framework (see Council submission points on these definitions). • Due to uncertainty created by the definitions combined with the low effects threshold, application of this policy as a consideration will have a regulatory reach that has not been justified by the s32 evaluation. • The requirement to avoid adverse effects is a high regulatory bar considering the definition of 'nature-based solution' applies to everything from estuaries and rivers to street trees. "Avoid" is a higher regulatory bar than that sought by the RPS for SNA which provides for the application of the effects management hierarchy. • Includes an effects threshold unrelated to the outcome sought in Objective CC.4. • This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans. 	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives, and amend policy to only apply to resource consents.
S170 Te Rūnanga o Toa Rangatira	S170.091	Policy CC.12: Protect, enhance and restore ecosystem	Not Stated / Neutral	Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		s that provide nature-based solutions to climate change - consideration		<p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p> <p>It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.</p>	
<p>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</p>	S34.045	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose in part	<p>It is unclear what the intent of this provision is, regarding climate change mitigation or adaptation functions. Is this intending to address existing nature-based solutions or future planned solutions?</p> <p>It is also unclear how territorial authorities are supposed to identify these effects, the scale of the effects and ensure that that they are avoided.</p> <p>Council does not oppose the intent of what the RPSPC1 is trying to achieve but considers that this places an onerous burden on territorial authorities and applicants.</p> <p>See our notes on Objective CC.4 for comments</p>	Delete policy in its entirety. See also comments on Policy CC.7 and Objective CC.4.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				regarding clarity of the definition of nature-based solutions.	
S79 South Wairarapa District Council	S79.040	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	The policy needs to provide more certainty around whether it applies to natural features that form part of climate mitigation or those which are created. For example, existing plantation forests, or existing indigenous forest, or artificial wetlands created to mitigate the effects of climate change.	Amend Policy CC.12 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 established mitigate the effects of climate change and particular regard shall be given to avoiding adverse effects on the climate change mitigation or adaptation functions of that solution. [End of amendment to Policy CC.12] Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.023	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.
S115 Hutt City Council	S115.061	Policy CC.12: Protect, enhance and restore	Oppose	The definitions of relevant terms including "nature-based solution", "climate change adaptation", and "climate change mitigation" are not clear enough to implement this policy. In addition, it does not	Delete new Policy CC.12

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		ecosystems that provide nature-based solutions to climate change - consideration		adequately set situations or thresholds where this assessment should occur.	
S123 Peter Thompson	S123.006	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Nature-based solutions are key to dealing with the impacts of climate change.	Retain as notified.
S123 Peter Thompson	S123.016	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support		Retain as notified.
S131 Ātiawa ki	S131.085	Policy CC.12:	Support in part	Ātiawa supports the protection, enhancement and restoration of	When considering an application for a resource consent, notice of requirement, or a change, variation or review of a

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Whakaron gotai Charitable Trust		Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration		ecosystems, Atiawa acknowledge the significant benefits that ecosystems and nature-based solutions provide to climate change and natural hazards. The wording of the policy does not provide a strong mechanism to protect, enhance and restore ecosystems. We do not think is appropriate, we seek clear policy direction to ensure biodiversity is protected, enhanced and restored.	district or regional plan, particular regard shall be given to: a) protecting ecosystems from adverse effects of an activity on climate change mitigation or adaptation functions and;b) enhance or restoring ecosystems where the ecosystem health is in a degraded state in order to for nature-based solutions to provide climate change mitigation or adaptation functions. Priority shall be given to actions that provide the greatest cobenefits for climate change mitigation and adaptation, indigenous biodiversity, fresh and coastal water. a determination shall be made as to whether an activity may adversely affect a nature-based solution to climate change and particular regard shall be given to avoiding adverse effects on the climate change mitigation or adaptation functions
S133 Muaūpoko Tribal Authority	S133.046	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S140 Wellington City	S140.062	Policy CC.12: Protect, enhance	Support in part	Intent and requirements of policy is unclear and confusing in terms of how it can be feasibly implemented given the policy has used broad and unclear terms.	Clarify and refine policy wording to provide greater certainty of how this policy will be implemented.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Council (WCC)		and restore ecosystems that provide nature-based solutions to climate change - consideration		This includes avoiding doing activities in constructed wetlands and rain gardens as they are included in the definition of nature-based solutions. Additionally, the accompanying definitions do not provide any further clarity for the Policy. This is addressed below.	
S144 Sustainable Wairarapa Inc	S144.009	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services , such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.
S144 Sustainable Wairarapa Inc	S144.021	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Nature-based solutions are key to dealing with the impacts of climate change. Hard engineering structures don't last, but allowing nature to provide ecosystem services , such as flood retention and carbon sequestration is more likely to have the long-term benefits required	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S147 Wellington Fish and Game Council	S147.065	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S148 Wellington International Airport Ltd (WIAL)	S148.028	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Oppose	Not sufficiently clear as to what a nature based solution to climate change involves. It would be inappropriate for this policy to unduly constrain regionally significant infrastructure and its associated development due to such uncertainty.	Delete this policy.
S163 Wairarapa Federated Farmers	S163.066	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate	Oppose	The proposed definition of "nature based solutions" refers specifically to the actions people take (eg, planting trees) and not to the trees themselves, ie, the policy seems confused on this point. To the extent that Council's intent is look after the trees (and wetlands etc), we suggest these are already comprehensively covered by existing regional and national RMA instruments.	That Policy CC.12 be deleted Delete the FW icon.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		change - consideration			
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.066	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Support recognising and providing for nature-based solutions, however stronger policy direction must be included. A direction to have "particular regard" is not strong enough, as it provides latitude for decision-makers to give little or no weight at all to such critical matters at the planmaking or consenting stage.	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 must be avoided.
S170 Te Rūnanga o Toa Rangatira	S170.091	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Not Stated / Neutral	<p>Policy CC.6 Increasing Forest Cover - regional plans, Policy CC.7 Identifying nature-based solutions to climate change - district and regional plans, and Policy CC.8 Protecting, restoring, and enhancing ecosystems that provide nature-based solutions to climate change - district and regional plans</p> <p>It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, it is not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this.</p> <p>The second point regarding Policy CC.6, CC.7 and CC.8, are the components that are related to District Plans. For Policy CC.7 and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>	<p>Clarify what is meant by 'nature-based solutions'.</p> <p>Clarify how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.	
S167 Taranaki Whānui	S167.0101	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support	Taranaki Whānui supports the principle of new Policy CC.12, noting in particular that it is informed by Method CC.9 and therefore Method IE.2	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0125	Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change - consideration	Support in part	Rangitāne o Wairarapa support the provision for nature-based solutions to climate change, however, the policy as currently worded, does not 'protect' them, as is stated in the explanatory text. We request that this policy includes more direction about how nature-based solutions should be protected, including for example through mechanisms such conditions. It is not sufficient for nature-based solutions to be simply a 'consideration' to which 'particular regard' is made through a resource consent, notice of requirement, change, variation or review of a district or regional plan.	Amend the policy to provide stronger protection for nature-based solutions, given the importance of such solutions in the region's climate change response.
S168 Rangitāne O	S168.0126	Policy CC.12: Protect, enhance	Support in part	Rangitāne o Wairarapa seek that this policy is cross-referenced with Policy 52 to reflect the priority of soft engineering over hard engineering solutions in achieving nature-based solutions.	Provide a cross-reference to Policy 52 in this policy, to reflect the priority that soft engineering solutions should be given over hard engineering solutions, in order to provide

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Wairarapa Inc		and restore ecosystems that provide nature-based solutions to climate change - consideration			for and protect nature-based solutions.
S16 Kāpiti Coast District Council	S16.026	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	We note the policy lacks certainty on whether it applies only to regional councils or also city and district councils. We request the policy is amended so it is clear it only applies to regional councils as city and district councils have no statutory functions or powers to manage discharges to air.	Amend Policy CC.13 so it only applies to regional councils.
S25 Carterton District Council	S25.036	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	The explanation notes that these matters can only be considered in a discharge permit or coastal permit. Therefore, the application of this policy is unclear. If the scope for considering these matters is limited, that should be made clear in the chapeau of the policy.	Amend the policy so that it is clear that these considerations can only apply to discharge permits and coastal permits.
S30 Porirua City Council	S30.061	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	The policy needs to be specific to regional council as the clauses relate solely to regional council functions in respect to greenhouse gas emissions.	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives; and/or reword as follows: When considering an application for a resource consent from the regional council , associated with a change in intensity or type of agricultural land use, particular regard shall be given to: (a) reducing gross greenhouse gas emissions as a priority where practicable, and

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					(b) where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and (c) avoiding any increase in gross greenhouse gas emissions.
S31 Robert Anker	S31.025	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Not Stated / Neutral	In focussing on gross emissions GWRC is only looking at part of the picture. There are always two sides to any equation, and it is more than possible to decrease gross emissions by say 10% but at the same time reduce an offsetting factor by say 20%. In that case the gross picture would show an emissions reduction, but the net picture would reveal an increase. Whilst Agriculture is a large numerical component of emissions it is also the sector which has shown one of the largest proportional reductions. It must also be recognised that agriculture provides a very large GDP and export contribution to the economy.	Amend the policy to read: Policy CC.13: Managing agricultural- gross net greenhouse gas emissions - consideration
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	Oppose in part	This is a significant change to regional consents and will place onerous requirements on all consents, even those that: <ul style="list-style-type: none"> • are relatively small • propose a reduction in intensity • result in a less than minor effects or • reduce environmental effects. Council considers this policy does not consider future growth being required to meet our housing needs and is contrary to the outcomes sought under the NPS-UD. It also does not allow for innovation and reductions in activity without the need for a resource consent.	Delete policy or amend policy to clarify that this relates to regional consents only, and set a threshold for when the provision applies, Review proposal to ensure that this is feasibly able to be implemented and does not place undue obligations on landowners. Clarify how this will relate to the NPS-HPL.
S62 Philip Clegg	S62.024	Policy CC.13: Managing agricultural gross greenhouse gas	Support in part	As per Policy CC.5. In focussing on gross emissions GWRC is only looking at part of the picture. There are always two sides to any equation, so net emissions is the correct measure here.	Amend as follows: When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to: (a) reducing gross net -greenhouse gas emissions as a priority where practicable, and

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		emissions - consideration			
S79 South Wairarapa District Council	S79.041	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	<p>The policy's implementation at 'farm level' will result in a sinking lid on agricultural activities and forcing offsets of permanent forest on rural communities.</p> <p>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.</p> <p>A more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where:</p> <p>e. Reductions required by this policy is in excess of government policy; and,</p> <p>f. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and,</p> <p>g. Impacts go beyond only the economic impact of carbon pricing; and,</p> <p>h. Considers the implied requirement to supplant farming activities with carbon sequestration.</p>	<p>Delete Policy CC.13 And,</p> <p>Establish a policy that:</p> <p>(a) does not result in a sinking lid to agriculture and forces afforestation on rural communities,</p> <p>(b) recognises that some emissions are unavoidable, but also that constant offsetting as a result will remove agricultural uses from the land,</p> <p>(c) local food supply is necessary to reducing greenhouse gas emissions from transport.</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought</p>
S96 Sarah (Dr) Kerkin	S96.020	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	<p>As per Policy CC.5. In focussing on gross emissions GWRC is only looking at part of the picture. There are always two sides to any equation, so net emissions is the correct measure here.</p>	<p>Amend as follows:</p> <p>When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to:</p> <p>(a) reducing gross net greenhouse gas emissions as a priority where practicable, and</p>
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.024	Policy CC.13: Managing agricultural gross greenhouse	Support	<p>Generally supports the policy to be considered in the 'Climate Change' chapter.</p>	<p>Retain as notified.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		e gas emissions - consideration			
S115 Hutt City Council	S115.062	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	We are neutral towards the overall intent of the policy but request the policy is amended to make clear that it applies to regional consents (which are the only relevant consents to the policy).	Retain Policy CC.13, but amend as follows: "When considering an application for aregional resource consent, ..."
S128 Horticulture New Zealand	S128.038	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	As previously noted need to be clear on the definition of 'agricultural greenhouse gas emissions' so that it is clear what will be assessed. This policy does not address the scale at which the assessment occurs; Seeks this is at the region (or if appropriate, whaitua scale). This is important to retain land flexibility while also driving towards lower emissions.	Amend as follows:When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to: (a) reducing gross agricultural greenhouse gas emissions as a priority where practicable, and (b) where it is not practicable to reduce gross agricultural greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and (c) avoiding any increase in gross agricultural greenhouse gas emissions at the region [or whaitua] scale .
S128 Horticulture New Zealand	S128.039	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	HortNZ also seek a more 'enabling' approach. Climate Change Commission analysis in Ināia tonu nei: a low emissions future for Aotearoa shows that even without new technologies, Aotearoa can reduce agricultural emissions through efficiencies on farms, and by switching some pastoral land to forestry and horticulture. Land use change to horticulture should therefore been provided for. This is important for meeting national direction around highly productive land and also emissions reduction. The policy and/or	Add new subclause: (d) providing for land use change to horticulture .

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				explanation could add further context to what tools will be used to support assessment.	
S128 Horticulture New Zealand	S128.040	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	The policy should have a limited applicability, from when the RMA enables such considerations (noting that this date will have passed once the RPS changes becomes operative) and only until such time as the regional plan specifically addresses greenhouse gas emissions, as the RPS directs.	Add new sentence in the Explanation section This policy does not take effect until November 2022 and will cease to apply once Policy CC.5 has been implemented through the regional plan.
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.086	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	Ātiawa note that the agricultural sector should be supported to reduce and avoid greenhouse gas emissions from their activities.	Retain as notified.
S133 Muaūpoko Tribal Authority	S133.047	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S136 DairyNZ	S136.016	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	Acknowledges the changes to the RMA that come into effect in November 2022 which give councils the ability to consider greenhouse gas emissions within the consenting process. The s32 report fails to appropriately justify why regulatory intervention in the form proposed is justified, the economic and social impacts of that intervention, or whether the costs associated with the policy will outweigh the benefits from the regulation. The National Environment Standards for Freshwater	Delete Policy CC.13 and address the issue through a full review of the RPS.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>require any intensification of land use over 10ha to gain a resource consent. Greenhouse gases could form a part of the considerations for consents triggered by this rule. However due to the lack of detail on how the assessment in a consenting process will be undertaken, concerned Policy CC.13 will result in unattended consequences and inconsistency with the national approach to reduce agricultural greenhouse gases. It is unclear what information will be accepted by council for consents and what granularity of greenhouse gas emissions changes will be impacted.</p> <p>Further work needs to be done to outline the details of how this policy will be implemented including the impact on farmers and what information will be accepted by councils in the consenting process.</p> <p>Concerned that Policy CC.13 only focuses on penalising increases and not rewarding reductions which farmers may implement for their own motivations. Support this policy being used as a carrot not just a stick.</p>	
S140 Wellington City Council (WCC)	S140.063	Policy CC.13: Managing agricultural greenhouse gas emissions - consideration	Support in part	As district plans may have rules that manage other aspects of agricultural land use, this policy should be clear it applies to discharge permits only.	Amend with this text, or similar: When considering an application for a discharge permit resource consent , associated with a change in intensity or type of agricultural land use, particular regard shall be given to:
S163 Wairarapa Federated Farmers	S163.067	Policy CC.13: Managing agricultural greenhouse gas emissions - consideration	Oppose	<p>Reasons as set out in respect of the proposed climate change objectives and Policy CC.5</p> <p>In addition, the directive in Policy CC.9 is expressed in terms of optimising planned developments in a way that contributes to reducing emissions (in respect of transport infrastructure); and Policy 2 is expressed in terms of support (in respect of industry): we are not clear why Policy CC.13 is expressed in different terms.</p>	That Policy CC.13 be deleted
S165 Royal	S165.067	Policy CC.13:	Support in part	Amendments required to require decisionmakers give more weight to the listed matters, and that the policy	Amend as follows: When considering an application for a resource consent,

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)		Managing agricultural gross greenhouse gas emissions - consideration		links to achieving the specific reductions sought in Objective CC.3.	associated with a change in intensity or type of agricultural land use, particular regard shall be given to ensure: ensure: (a) reducing gross greenhouse gas emissions are reduced in accordance with Objective CC.3 as a priority where practicable , and (b) where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and (c) avoiding any increase in gross greenhouse gas emissions is avoided .
S166 Masterton District Council	S166.052	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Not Stated / Neutral	MDC enquire whether the intent of this policy to limit dairy farming intensification? If so, how are these communities going to be supported?	Clarifications. More clarity required regarding the policy intent with regard to dairy farming intensification.
S167 Taranaki Whānui	S167.0102	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	We are aware that central government is taking the lead on the policy approach but given the climate crisis and the role agriculture plays, Taranaki Whānui as mana whenua feel strongly that the minimum expectation for this region should aim for reduction.	Amend policy to provide for emissions reduction: Policy CC.13: Managing Reducing agricultural gross greenhouse gas emissions - consideration
S168 Rangitāne O Wairarapa Inc	S168.0128	Policy CC.13: Managing agricultural gross greenhouse	Support	Rangitāne o Wairarapa support the prioritisation in this policy that gross greenhouse gas emissions from agricultural land use are reduced as the first priority. However, we remain concerned that 'where practicable' weakens the strength of this policy and may not be	The policy should be amended so that the term 'where practicable' is properly described within the policy and the circumstances in which actions must be regarded as being 'practicable' are stated.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		e gas emissions - consideration		sufficient to address the reductions needed in this sector.	
S16 Kāpiti Coast District Council	S16.027	Policy CC.14: Climate-resilient urban areas - consideration	Oppose	<p>With the exceptions of the principles of water sensitive urban design and the requirement for capturing and storing rainwater via rainwater tanks, the policy demonstrates a lack of understanding of district planning, urban planning processes and procedures, and the limits of regulatory intervention in a district plan in the absence of legislative mandate.</p> <p>Council considers the policy should be deleted in favour of non-regulatory methods that would encourage and incentivise the desired outcomes including:</p> <ul style="list-style-type: none"> • Enhancing, maintaining and creating urban greening to provide urban cooling. • A suburb-scale tree canopy cover target of 10% by 2030 and 30% cover by 2050. • Restoration and enhancement of natural ecosystems. • Efficient use of energy and water in buildings and infrastructure. • Buildings infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind. <p>The drafting of RPS Change 1 does not suitably account for the limitations that legislation creates on district plans, and on resource consent decision-making by city and district councils. Had the section 32 evaluation considered this policy and the suggested tasks in detail it would have identified that:</p> <ul style="list-style-type: none"> • The resilience of buildings is a matter addressed by the Building Act and its associated regulations. • District plans do not prevent water and energy efficient design of buildings. Therefore, it is unclear why district plans would need to be changed to provide for them. • The enhancement and restoration of natural ecosystems are not activities that can be required under a district plan. District and city council functions 	Delete Policy CC.14. Investigate the use of non-regulatory methods to achieve the stated goals outside of the RPS.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>under the RMA require the maintenance of indigenous biodiversity. Therefore, restoration and enhancement of the natural ecosystems is best achieved via non-regulatory incentives and support.</p> <ul style="list-style-type: none"> • Tree coverage targets for suburban areas to provide urban cooling conflicts with development enabled by the MDRS. It is also unclear how a district plan could require contributions of tree planting in urban areas to achieve the stated targets, which Council notes has no statutory basis or convincing evidence base to support them. The use of non-regulatory methods should be the option pursued by GWRC, working in partnership with city and district councils rather attempting regulatory methods that are not supported by legislation. 	
<p>S25 Carterton District Council</p>	<p>S25.037</p>	<p>Policy CC.14: Climate-resilient urban areas - consideration</p>	<p>Support</p>	<p>CDC supports this policy but notes that (f) is better addressed via the Building Act framework, rather than through RMA processes. Request deletion of clause (f).</p>	<p>Amend the policy as follows:</p> <p>Policy CC.14: Climate-resilient urban areas - 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, provide for actions and initiatives, particularly the use of nature-based solutions, that contribute to climate resilient urban areas, including:</p> <p>...</p> <p>(f) buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.</p>
<p>S30 Porirua City Council</p>	<p>S30.062</p>	<p>Policy CC.14: Climate-resilient urban areas - consideration</p>	<p>Oppose</p>	<p>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 	<p>Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives.</p>

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				<p>urban design", "resilience". The lack of definitions for these terms creates uncertainty for applicants, councils, and other stakeholders.</p> <ul style="list-style-type: none"> • 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 	

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				<p>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 of applications may not be the most effective way of implementing resilience in that area.</p> <p>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>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</p>	<p>S34.010</p>	<p>Policy CC.14: Climate-resilient urban areas - consideration</p>	<p>Oppose</p>	<p>There appears to be no clear legislative or policy statement support for requiring the implementation of the specific measures proposed within this policy.</p> <p>The policy also contains several terms that are not clearly defined or clarified, e.g., 'urban greening' and requirements that neighbourhood scale infrastructure is provided for at all scales of development, with no direction on what threshold should be applied to these requirements.</p> <p>Council notes that the Section 32 report identifies that nature- based solutions are an important response to climate change adaptation and mitigation, but it is not considered that this meets the test of Section 32 (1) (b) of the RMA - that there has been sufficient examination on "whether the provisions in the proposal are the most</p>	<p>Delete policy CC.14 in its entirety and consider non regulatory methods as a means of compliance to achieve policy CC.4.</p>

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				<p>appropriate way to achieve the objectives". In respect of the individual clauses:</p> <p>Clause (a) - it is unclear how this can be achieved, measured and monitored. It is noted that in some areas there is more than 10% canopy already, and many trees may not grow quickly enough to achieve the canopy requirements by 2030. It is also noted that 'tree canopy cover' is a very selective term which discounts a number of vegetation types which could contribute positively to the intent of the policy and the higher order objective but have been excluded by the use of the term 'canopy'. Council further notes that the requirements for tree canopy cover are at odds with NPS-UD, as canopy cannot work with townhouses, and it is impractical to rely solely on street trees to achieve this measure.</p> <p>Clause (c): It is not considered appropriate to set, nor does there appear to be sufficient evidence, legislative support or justification for the setting of, targets for urban roof area rainwater collection in district plans. This also ignores that there could be other nature-based solutions that may support other objectives e.g., hydraulic neutrality and open space requirements in urban areas, through methods such as green rooves or rooftop gardens.</p> <p>Clauses (b) and (c), natural water systems and capturing rainwater at a community level and rainwater tanks require space, which may not be available in an urban context. It may also be a resource burden that Council is not appropriately funded or resourced to maintain.</p> <p>Regarding clauses (e) and (f), it is unclear why the proposed provisions include requirements in district plans (or when considering consents) to address water use in buildings, and that buildings are able to withstand the effects of climate change. The proposed provisions do not address how this could be achieved in district plans, nor does there appear to</p>	

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				be a higher order document that supports this. These provisions seem to be more appropriately dealt with through the Building Act.	
S63 Mary Beth Taylor	S63.010	Policy CC.14: Climate-resilient urban areas - consideration	Support	Rain water harvesting and storage and renewable generation must be normalised.	Retain as notified.
S95 Tony Chad	S95.009	Policy CC.14: Climate-resilient urban areas - consideration	Support	Rain water harvesting and storage and renewable generation must be normalised.	Retain as notified.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.025	Policy CC.14: Climate-resilient urban areas - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.
S113 Wellington Water	S113.028	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	<p>Simplify for clarity, and be clear that any water in urban areas that is not provided by Wellington Water should only be used for non- potable uses to ensure good public health outcomes.</p> <p>Also, it is unclear what 'community scale' means - if this involves creation of an additional network for vesting, Wellington Water may oppose the clause in its entirety.</p>	<p>Amend clause (c) as follows: (c) capturing, storing and recycling harvesting water at a community- scale for non-potable uses (for example by requiring rain tanks, and setting targets for urban roof area rainwater collection) OR Delete the clause in its entirety.</p>
S115 Hutt City Council	S115.063	Policy CC.14: Climate-	Oppose	The principles for water sensitive urban design (clause (b)) and rainwater retention (clause (c)) duplicate the freshwater-specific policies and should be deleted.	<ul style="list-style-type: none"> Delete new Policy CC.14, or Amend the policy to remove clauses (b) and (c) and

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		resilient urban areas - consideration		The remaining matters cannot be achieved through the regulatory means available to territorial authorities. As such, if this policy is retained, we seek an amendment to clarify that the policy applies to regional plans only.	clarify that the policy only applies to regional plans.
S123 Peter Thompson	S123.017	Policy CC.14: Climate-resilient urban areas - consideration	Support	The target of 10 percent tree canopy cover at a suburb-scale is useful.	Retain as notified.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.087	Policy CC.14: Climate-resilient urban areas - consideration	Support	Ātiawa supports providing for actions and initiatives (including nature-based solutions) to contribute to climate resilient urban areas.	Retain as notified.
S132 Toka Tu Ake EQC	S132.006	Policy CC.14: Climate-resilient urban areas - consideration	Support	As above	Strengthen, especially regards areas intensified through the NPS-UD
S133 Muaūpoko Tribal Authority	S133.048	Policy CC.14: Climate-resilient urban areas - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S137 Greater Wellington Regional	S137.010	Policy CC.14: Climate-resilient urban	Support in part	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, including working and work towards

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Council (GWRC)		areas - consideration			achieving a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050.... (f) promoting buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.
S140 Wellington City Council (WCC)	S140.064	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	This "provide for" policy is unclear how it would work with resource consents and notices of requirement, and to a lesser extent plan changes, given many will not be relevant to climate resilience. Also some are covered by other methods, e.g. through the Building Act, through pre-development stormwater requirements, Wellington Water methods for efficient water use and discharge	Amend (a) by deleting the targets: 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,
S140 Wellington City Council (WCC)	S140.065	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Wellington City supports increasing tree canopy cover in our City. Our urban suburbs collectively already have 30.61% tree cover. (https://ir.canterbury.ac.nz/bitstream/handle/10092/102168/FOR_E1265_Tree_Canopy_Wgtn_Report.pdf?sequence=2&isAllowed=y#:~:text=Overall%20tree%20canopy%20cover%20in,ranking%20between%2010%20%E2%80%93%2040%25.) Our Green Network Plan aims to double the number of trees in the Central City. However, a 30% tree canopy cover target is not reasonable for some suburbs. Rongotai suburb is mostly Airport and bulk retail/industrial (currently 1% tree cover), and Pipitea suburb is mostly transport infrastructure (currently 3% tree cover). Wellington City is also relatively unique in the Region for not suffering from a noticeable heat island effect due to its regular wind, topography and coastal location. Targets are best left to district councils to set according to their own situation and methods.	Amend (a) by deleting the targets: 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,
S144 Sustainable	S144.022	Policy CC.14: Climate-	Support	The target of 10 percent tree canopy cover at a suburb-scale is useful. Encourage indigenous cover. Also, ensure decisions are made within & by communities.	Retain as notified.

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Wairarapa Inc		resilient urban areas - consideration			
S147 Wellington Fish and Game Council	S147.066	Policy CC.14: Climate-resilient urban areas - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S148 Wellington International Airport Ltd (WIAL)	S148.029	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Concerned that the drafting of this policy would require all of these matters to be achieved when considering development within urban areas by the use of the "and" between "e" and "f". In some urban environments achieving all of these outcomes would be impractical, for example buildings within the airport could be used more efficiently to conserve water and energy usage, however it would be inappropriate for the airport to create green spaces, as these would present an aviation hazard and safety issue	Delete this policy, or ensure that it does not apply to the Airport area.
S166 Masterton District Council	S166.053	Policy CC.14: Climate-resilient urban areas - consideration	Not Stated / Neutral	More information required as to how the tree canopy target will work in practice? How is it implemented, monitored and enforced? How do you maintain it?	Clarifications. More clarity needed around the tree canopy cover target.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.0145	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	Increase targets for tree canopy cover and include provision for green infrastructure and making "room for rivers" in order to increase flood protection capacity and promote the carbon.	Amend clause (a) as follows: (a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards achieving a target of: i. 40 at least 15 percent tree canopy cover at a suburb-scale by 2030, ii. at least 30 percent cover by 2030 at the suburb scale where 15 percent cover is already in place, and

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					30 iii. 50 percent cover in all cases by 2050, Include the following clause: (x) providing for green infrastructure and making room for rivers
S167 Taranaki Whānui	S167.0103	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	[Note. no reason given in this submission point]	Insert a new clause, to read: (x) enabling mana whenua / tangata whenua to provide for their relationship with their culture, land, water, wāhi tapu and other taonga
S168 Rangitāne O Wairarapa Inc	S168.0130	Policy CC.14: Climate-resilient urban areas - consideration	Support	Rangitāne o Wairarapa support providing for actions and initiatives, particularly nature-based solutions to protect, enhance, or restore natural ecosystems.	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0171	Policy CC.14: Climate-resilient urban areas - consideration	Support in part	The requirements to provide for actions and initiatives, particularly nature-based solutions, that contribute to climate-resilient urban areas is supported. Nature-based solutions should be informed by mātauranga Māori. However, Rangitāne o Wairarapa notes that the target and date for restoring tree canopy cover has been weakened from previous draft provisions, from 30% by 2030 to 10% by 2030 and 30% by 2050.	Amend the policy to reference that the use of nature-based solutions should be informed by mātauranga Māori.
S10 Transpower New Zealand Limited	S10.004	Policy 39: Recognising the benefits from renewable energy and regionally significant	Support in part	As for Policy 7, Policy 39 covers several rather distinct elements. While Transpower does not oppose the addition of the text in (a) referencing reducing greenhouse gas emissions, Transpower submits clause d) of the policy could benefit from greater recognition of the need for transmission of the energy and electricity generation. Such reference would give effect to the NPSET.	Amend Policy 39(d) to recognise high voltage electricity transmission. (d) 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

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		infrastructure - consideration			energy resource.
S16 Kāpiti Coast District Council	S16.038	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	Although Council supports the general intent of this policy, the use of the term particular regard shall be given within a consideration policy is not supported. An amendment to correct this inconsistency is requested.	Amend Policy 39 as follows: Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration 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) ...
S30 Porirua City Council	S30.063	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose	<p>This policy as a whole has less breadth of benefits than either the NPS-REG or the NES- ET. For example, in regard to clause (a), the NPS-REG is much broader than this and includes avoiding, reducing or displacing greenhouse gas emissions.</p> <p>The policy needs to be updated to address the benefits. As it is, it covers more than just the benefits. If it is intended to just address benefits, then it needs to be split into two policies - one for benefits, and the second for recognizing and providing for renewable energy.</p> <p>This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans.</p>	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and amend policy to only apply to resource consents.
S49 Chorus New Zealand Limited, Spark New Zealand Trading Limited,	S49.004	Policy 39: Recognising the benefits from renewable energy and regionally significant	Support in part	<p>The amendments proposed to Policy 39, 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>The policy needs to ensure that the importance of regionally significant infrastructure is not minimised if it</p>	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>

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Vodafone Spark New Zealand Trading Limited		infrastructure - consideration		does not make a quantifiable contribution to the reduction of greenhouse gas emissions.	
S99 Genesis Energy Limited	S99.003	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	<p>For reasons set out in Policy 7 above.</p> <p>In addition, whilst wind, solar and marine are renewable energy resources currently known within the region, Genesis considers the RPS should seek to facilitate new low or zero carbon energy resources (such as biofuels) that may be identified in the future as technology advancement allows.</p>	<p>Amend Policy 39 as shown below.</p> <p>Policy 39: Recognising Promote, enable and protects 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, 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</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 and new low or zero carbon energy resources that may be identified as technology advances.</p> <p>Explanation</p> <p>Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and</p>

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					community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions.
<p>S100 Meridian Energy Limited</p>	<p>S100.018</p>	<p>Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration</p>	<p>Support in part</p>	<p>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>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): "Policy 39: Recognising Promoting and enabling the benefits from renewable energy and regionally significant infrastructure - consideration 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: (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 (b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and (c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and (d) significant wind, solar and marine renewable</p>

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					<p>energy resources within the region.</p> <p>Explanation</p> <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</p>

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					<p>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>
<p>S113 Wellington Water</p>	<p>S113.029</p>	<p>Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration</p>	<p>Oppose</p>	<p>The addition in clause (a) creates a third tier of infrastructure to the detriment of regionally significant infrastructure and should be deleted.</p>	<p>Amend clause (a) as follows: (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</p>
<p>S114 Fulton Hogan Ltd</p>	<p>S114.003</p>	<p>Policy 39: Recognising the</p>	<p>Support in part</p>	<p>This policy relates to renewable energy and regionally significant infrastructure. National policy direction including the proposed revision to the NES-F and NPS-</p>	<p>Add clause e) e) the need for quarrying activities to locate where aggregate (clay, silt, rock or</p>

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		benefits from renewable energy and regionally significant infrastructure - consideration		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.	sand) resources exist.
S115 Hutt City Council	S115.064	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	Support but note that resource consent decisions have little practical ability to determine whether infrastructure contributes to reducing greenhouse gas emissions, and the resource management system as a whole is not well suited to influencing decisions about alternative projects. See our comments on Policy CC.11.	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.
S117 Sustainable Electricity Association of New Zealand (SEANZ)	S117.004	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support	The section 32 evaluation for "climate change and energy" refers to three options. "Option 3" has not been specifically developed but is said to be aimed at increasing "stringency of the provisions and require implementation in the medium term". The s32 evaluation identifies that "The costs of option 3 are low, however the benefits would potentially achieve the greatest benefit to society". SEANZ supports that general intent and wishes to see it properly developed as a package of provisions. SEANZ also notes that Option 3 is more consistent than the 'preferred option' with giving effect to 3.1A, Policy 7, Policy 39, Policy 11, and the "CC" policies.	General support, but strengthen to give effect to 'Option 3' from the section 32 analysis.
S124 KiwiRail Holdings Limited	S124.007	Policy 39: Recognising the benefits from renewable	Support	KiwiRail supports the amendments to Policy 39 and the policy explanation. Recognition of the benefits of regionally significant infrastructure, particularly where it contributes to reducing greenhouse gas emissions, is supported by KiwiRail.	Retain as notified.

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		energy and regionally significant infrastructure - consideration			
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.088	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	In principle Ātiawa supports options for renewable energy generation. Ātiawa seeks to be actively involved in resource consent applications where renewable energy activities could impact on mana whenua values, particularly with our relationship with culture, traditions, ancestral lands, water, sites, wāhi tapu and other taonga.	Retain as notified.
S134 Powerco Limited	S134.014	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose	Not all regionally significant infrastructure is, itself, able to contribute to a reduction in greenhouse gases. Electricity and gas distribution networks, for example, convey energy from its source and/or another provider, to where it is used, irrespective of the way in which that energy generated. The policy already specifically recognises energy generated from renewable sources. It is unnecessary to create a further distinction between regionally significant infrastructure on the basis that it is able to contribute to a reduction in greenhouse gas emissions. The addition to clause (a) is, therefore, opposed. The wording of the policy explanation as it currently appears in the operative RPS appropriately recognises the benefits of renewable energy and regionally significant infrastructure and its role in enabling communities to provide for their social, economic, cultural and environmental wellbeing. In contrast, the wording proposed through Change 1 focuses on the adverse effects of renewable energy and regionally significant infrastructure and is opposed.	Amend Policy 39 by retaining the wording used in the operative RPS, 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, particular regard shall be given to: (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 ... Explanation: 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

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					<p>generated from renewable energy resources include:</p> <ul style="list-style-type: none"> • Security of and the diversification of our energy sources • Reducing our dependency on imported energy resources - such as oil, natural gas and coal • Reducing greenhouse gas emissions • Contribution to the national renewable energy target <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 also have adverse effects on the surrounding environment and community. These competing considerations need to be weighed on a case by case basis to determine what is appropriate in the circumstances. When considering the benefits from renewable energy generation, the contribution towards national goals in</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>the New Zealand Energy Strategy (2007) and the National Energy Efficiency and Conservation Strategy (2007) will also need to be given regard. Potential significant sites for development of Wellington region's marine and wind resources have been identified in reports 'Marine Energy - Development of Marine Energy in New Zealand with particular reference to the Greater Wellington Region Case Study by Power Projects Ltd, June 2008' and 'Wind Energy - Estimation of Wind Speed in the Greater Wellington Region, NIWA, January 2008'. Policy 39(a) shall cease to have effect once policy 9 is given effect in a relevant district or regional plan. Policy 39(b) shall cease to have effect once policy 8 is given effect in a relevant district or regional plan.</p>
<p>S140 Wellington City Council (WCC)</p>	<p>S140.066</p>	<p>Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration</p>	<p>Support</p>	<p>Support as proposed.</p>	<p>Retain as notified.</p>
<p>S148 Wellington International Airport Ltd (WIAL)</p>	<p>S148.035</p>	<p>Policy 39: Recognising the benefits from</p>	<p>Oppose in part</p>	<p>WIAL supports the policy in so far as it seeks to recognise the social, economic, cultural and environmental benefits of regionally significant infrastructure. However, the addition of "in particular low and zero carbon regionally significant infrastructure" is</p>	<p>Delete reference to "in particular low and zero carbon regionally significant infrastructure" in this policy.</p>

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		renewable energy and regionally significant infrastructure - consideration		vague and it appears to elevate or prioritise this type of infrastructure over all other types of regionally significant infrastructure. This would be inappropriate and as discussed above it is critically important that the RPS protects existing regionally significant infrastructure from the adverse effects of climate change coupled with sufficient flexibility to adapt and respond to the challenges (and possibly opportunities e.g. developing localised renewable energy generation facilities) climate change will present.	
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.017	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose	<p>Not all regionally significant infrastructure is, itself, able to contribute to a reduction in greenhouse gases. While the broader objective of moving towards a carbon neutral economy is acknowledged, there will be continued reliance on the Fuel Companies' regionally significant bulk fuel supply infrastructure, during that transition and the role it plays in ensuring security of energy supply and diversity in energy sources. Opportunities may be available for transitioning existing infrastructure away from hydrocarbons and towards lower-carbon options such as biofuels. However, in the interim, the critical role of infrastructure in supporting the regional economy needs to be recognised and appropriate provision made for the ongoing operation, maintenance and upgrade of infrastructure. The policy already specifically recognises energy generated from renewable sources. It is unnecessary to create a further distinction between regionally significant infrastructure on the basis that it is able to contribute to a reduction in greenhouse gas emissions. The addition to clause (a) is, therefore, opposed.</p> <p>The wording of the policy explanation as it currently appears in the operative RPS appropriately recognises the benefits of renewable energy and regionally significant infrastructure and its role in enabling communities to provide for their social, economic, cultural and environmental wellbeing. In contrast, the wording proposed through Change 1 focuses on the adverse effects of renewable energy and regionally significant infrastructure and is opposed.</p>	<p>Amend Policy 39 by retaining the wording used in the operative RPS, Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration 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: (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</p> <p>.... Explanation 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: • Security of and the diversification of our energy sources • Reducing our dependency on imported energy resources - such as oil, natural gas and coal • Reducing greenhouse gas emissions • Contribution to</p>

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>the national renewable energy targetThe 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 also have adverse effects on the surrounding environment and community. These competing considerations need to be weighed on a case by case basis to determine what is appropriate in the circumstances.When considering the benefits from renewable energy generation, the contribution towards national goals in the New Zealand Energy Strategy (2007) and the National Energy Efficiency and Conservation Strategy (2007) will also need to be given regard.Potential significant sites for development of Wellington region's marine and wind resources have been identified in reports 'Marine Energy -</p>

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					<p>Development of Marine Energy in New Zealand with particular reference to the Greater Wellington Region Case Study by Power Projects Ltd, June 2008' and 'Wind Energy - Estimation of Wind Speed in the Greater Wellington Region, NIWA, January 2008'.Policy 39(a) shall cease to have effect once policy 9 is given effect in a relevant district or regional plan.Policy 39(b) shall cease to have effect once policy 8 is given effect in a relevant district or regional plan.</p>
<p>S162 Winstone Aggregates</p>	<p>S162.010</p>	<p>Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration</p>	<p>Oppose in part</p>	<p>The benefits of recognising regionally significant mineral resources has been completely missed. Previously successfully campaigned during the mediation sessions for the NRP to have this explicitly recognised. (see PNRP Objective 011 and 09 etc.) This policy is a good fit for including significant mineral resources (as reflected in Policy P15 of the NRP) and will guide good decision making in future plans.</p>	<p>Amend title: Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure and mineral resource utilisation - consideration</p>
<p>S162 Winstone Aggregates</p>	<p>S162.011</p>	<p>Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration</p>	<p>Oppose in part</p>	<p>The benefits of recognising regionally significant mineral resources has been completely missed. Successfully campaigned during the mediation sessions for the NRP to have this explicitly recognised. (see PNRP Objective 011 and 09 etc.) This policy is a good fit for including significant mineral resources (as reflected in Policy P15 of the NRP) and will guide good decision making in future plans.</p>	<p>amend subclause. (b) protecting regionally significant infrastructure and significant mineral resources from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure or mineral resource; and</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S162 Winstone Aggregates	S162.012	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose in part	The benefits of recognising regionally significant mineral resources has been completely missed. Previously successfully campaigned during the mediation sessions for the NRP to have this explicitly recognised. (see PNRP Objective 011 and 09 etc.) This policy is a good fit for including significant mineral resources (as reflected in Policy P15 of the NRP) and will guide good decision making in future plans.	amend subclause: (c) the need for renewable electricity generation facilities and quarrying activities to locate where the renewable energy resources exist; and
S163 Wairarapa Federated Farmers	S163.068	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Oppose	Reasons as set out in respect of Policy 7, specifically that the amendments do not provide for the social, economic, cultural, and environmental benefits of water storage infrastructure, in particular where it contributes to security of supply for municipal, industrial and primary production uses.	That the amendments to Policy 39 be deleted.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.068	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support in part	Drafting improvement to link the reductions in greenhouse gas emissions to the targets in Objective CC.3	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 reduces greenhouse gas emissions in a way that achieves the targets in Objective CC.3 ; and
S170 Te Rūnanga o	S170.048	Policy 39: Recognising the	Not Stated / Neutral	Most regionally significant infrastructure is located where iwi and Tangata Whenua has sites of significance or cultural redress in their Treaty	Recognise that regionally significant infrastructure is often located where iwi and Tangata Whenua has sites of significance or cultural redress in their Treaty Settlement

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Toa Rangatira		benefits from renewable energy and regionally significant infrastructure - consideration		Settlement Claims Act. This consideration of Policy 39 should not clash implementing iwi's rights of Tino Rangatiratanga and should not be interpreted in a way that the need for infrastructure does not recognise the rights and interests associated with the proposals. If there is such prospect of this happening, going forward should be co-designed with Tangata Whenua and iwi. This link between the sites and areas of significance and regionally significant infrastructure is crucial.	Claims Act. The need for infrastructure must recognise these rights and interests, and Tino Rangatiratanga.
S167 Taranaki Whānui	S167.0104	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support	Taranaki Whānui supports the amendments to Policy 39	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0139	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure - consideration	Support	Rangitāne o Wairarapa support the recognition of cultural benefits alongside social, economic and environmental deriving from regionally significant infrastructure and renewable energy resources, where access to and use of the infrastructure and renewable energy sources, and therefore the benefits generated, are equitable and achieve, social, economic, cultural and environmental well-being. Consideration of benefits, protection and location of these resources in decision-making is also supported.	Retain as notified.
S11 Outdoor Bliss Heather Blissett	S11.007	Policy 40: Protecting and enhancing the health	Support in part	Needs to be essential	Amend as follows: Protecting and enhancing the health and wellbeing of water bodies and freshwater ecosystems - consideration essential

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and well-being of water bodies and freshwater ecosystems - consideration			
S16 Kāpiti Coast District Council	S16.051	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Council supports the policy and the matters to be considered by the regional council for regional consents. We note the matters align with the functions of regional councils and appropriately address the NPS-FM matters that fall within the jurisdiction, resourcing, skills and role of regional councils under the RMA and NPS-FM.	Retain.
S30 Porirua City Council	S30.064	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions. Clause (d) duplicates (a) and (b).	Amend policy as follows: 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 water bodies 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, as a minimum, water quality in the coastal marine area is managed in a way that protects and enhances the health and well-being of waterbodies and the health and wellbeing of marine ecosystems; (c) providing for mana whenua / tangata whenua values, including mahinga kai; (d) maintaining or enhancing the functioning of ecosystems in the water body; (e) maintaining or enhancing the ecological

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>functions of riparian margins;</p> <p>(f) minimising the effect of the proposal on groundwater recharge areas that are connected to surface water bodies;</p> <p>(g) maintaining or enhancing the amenity and recreational values of rivers and lakes, including those with significant values listed in Table 15 of Appendix 1;</p> <p>(h) protecting the significant indigenous ecosystems and habitats with significant indigenous biodiversity values of rivers and lakes, including those listed in Table 16 of Appendix 1;</p> <p>(i) maintaining natural flow regimes required to support aquatic ecosystem health;</p> <p>(j) maintaining or enhancing space for rivers to undertake their natural processes;</p> <p>(k) maintaining fish passage;</p> <p>(l) protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning;</p> <p>(m) restricting stock access to estuaries rivers, lakes and wetlands; and avoiding the removal or destruction of indigenous wetland plants in wetlands.</p>
<p>S32 Director-General of Conservation</p>	<p>S32.022</p>	<p>Policy 40: Protecting and enhancing the health and well-being of</p>	<p>Support in part</p>	<p>The proposed changes are appropriate in giving effect to the NPSFM 2020 and the NZCPS 2010. However, the first two subclauses require amendment so that they provide direction and not just a statement.</p>	<p>Retain as notified, except for the following changes: "(a)ensuring that..." "(b)ensuring that..."</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		water bodies and freshwater ecosystems - consideration			
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 in part	Support changes since the exposure draft, to refer to regional consents only. However, the change from 'maintain' to 'protect' is significant, as well as the change in verbs from 'discourage' to 'restrict' and 'avoid' and the need to 'restore'.	Planning and legal review of the verbs to ensure this is feasibly able to be achieved. Amend the Section 32 Assessment to adequately assess this significant difference in policy direction.
S79 South Wairarapa District Council	S79.042	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	This is a value that is included in the proposed PC1 framework that is absent in the decision making in Policy 40. This water has significant value of the community and should also be protected when considering resource consents. Policy FW.5 does not achieve this in its current form.	Amend Policy 40 to recognise the need for water to support human health. Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought
S100 Meridian Energy Limited	S100.019	Policy 40: Protecting and enhancing the health and well-being of	Support in part	The focus of Policy 40 should be on the significant values of the rivers and lakes. If changing the text in relation to wetlands, the opportunity should be taken to correct the expression to 'natural wetlands'.	Amend clause (h) as follows (or similar): When considering an application for a regional resource consent, particular regard shall be given to: (a) ... (b) ... (c) ... (d) ...

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		water bodies and freshwater ecosystems - consideration			(e) ... (f) ... (g) ... (h) protecting the values of rivers and lakes that have significant indigenous ecosystems and aquatic habitats with significant indigenous biodiversity values of rivers and lakes , including those listed in Table 16 of Appendix 1; (m) discouraging restricting stock access to estuaries rivers, lakes and natural wetlands; and (n) discouraging avoiding the removal or destruction of indigenous wetland plants in natural wetlands.
S113 Wellington Water	S113.030	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Clauses (f) and (i) lack clarity.	Amend clause (f) (f) Minimising the effect of the proposals such as gravel extraction, exploratory drilling, flood protection and works in the beds of lakes and rivers on groundwater recharge areas that are connected to surface water bodies (i) Maintaining natural flushing flow regimes required to support aquatic ecosystem health
S114 Fulton Hogan Ltd	S114.004	Policy 40: Protecting and enhancing the health and well-being of water	Support in part	Clause h) is not clearly phrased, it is recommended that this clause be re- worded to clarify its intent.	(h) protecting the significant indigenous ecosystems and habitats of rivers and lakes with significant indigenous biodiversity values of rivers and lakes , including those listed in Table 16 of Appendix 1;

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		bodies and freshwater ecosystems - consideration			
S115 Hutt City Council	S115.065	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Not Stated / Neutral	No position on the substance of this policy but note a mistake in Table 4: the cross-reference to Method 4 (implemented by city and district councils) should be Method 2 (Regional plan implementation).	Amend Table 4: Under Policy 40, remove reference to Method 4 and replace with Method 2.
S128 Horticulture New Zealand	S128.041	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	The considerations are generally consistent with the NPSFM direction.	Retain as notified
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.089	Policy 40: Protecting and enhancing the health and well-being of water	Support in part	While Ātiawa supports the protection and enhancement of the health and well-being of water bodies and freshwater ecosystems, Ātiawa is concerned that this policy applies only to regional consents. Ātiawa seeks that this policy apply where relevant to district consents. When viewing the natural	Policy 40: Protecting and enhancing the health and wellbeing of water bodies and freshwater ecosystems - consideration When considering an application for a regional resource consent, particular regard shall be given to:

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		bodies and freshwater ecosystems - consideration		environment through an integrated lens, which is a widely acknowledged and accepted principle, the effects of land use effect other parts of the natural environment. That is, what occurs on the land, if poorly management can have poor outcomes for water, biodiversity, and the ecosystem. An integrated approach to resource management is a key aspect of RPS Change 1, as it is currently drafted this policy does not align with this approach. Ātiawa does not propose to address responsibilities of regional and local authorities, rather to address at a high level that all freshwater management must (whether direct or indirect) must be managed in a way that gives effect to the NPS-FM, including Te Mana o te Wai.	
S133 Muaūpoko Tribal Authority	S133.011	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S134 Powerco Limited	S134.015	Policy 40: Protecting and enhancing the health and well-being of water bodies and	Support	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the	Amend Policy 40 to recognise that enhancement of waterbodies and freshwater ecosystems may not be necessary or practicable in allcases and that the policy focus is on the quality of fresh water rather thancoastal water. This could be achieved by making changes along the followinglines: "Policy 40: Maintaining Protecting and enhancing the healthand well-being of water bodies and

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		freshwater ecosystems - consideration		Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	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.: ..."
S140 Wellington City Council (WCC)	S140.067	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	Support as proposed.	Retain as notified.
S144 Sustainable Wairarapa Inc	S144.040	Policy 40: Protecting and enhancing the health and well-being of water	Support	Protecting freshwater will be an essential part of using nature-based solutions for water resilience and adapting to climate change. In particular, protecting groundwater recharge areas and giving rivers more space and improving their natural character will be needed.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		bodies and freshwater ecosystems - consideration			
S147 Wellington Fish and Game Council	S147.009	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM. The proposed amendments are necessary to give effect to Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.	Insert new subclause in Policy 40 as follows: (fa) avoiding the loss of river extent and values;
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	Support in part	Supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM. The proposed amendments are necessary to give effect to Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.	Insert new subclause in Policy 40 as follows: (ha) protecting the habitats of indigenous freshwater species, trout and salmon;
S147 Wellington Fish and Game Council	S147.011	Policy 40: Protecting and enhancing the health and well-being of water	Support in part	Supports the expansion and reframing of Policy 40 to protect and enhance the health and well-being of water bodies and freshwater ecosystems as specified in the NPS-FM. The proposed amendments are necessary to give effect to Policies 6, 7 and 9 and 10 of the NPS-FM and to properly encapsulate the wide range of valued species, habitats, and ecosystems across the region.	Insert new subclause in Policy 40 as follows: (ma) ensuring that there is no further loss of natural inland wetlands and their values are protected;

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		bodies and freshwater ecosystems - consideration			
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.018	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	Amend Policy 40 to recognise that enhancement of water bodies and freshwater ecosystems may not be necessary or practicable in all cases and that the policy focus is on the quality of fresh water 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
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.019	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water	Amend Policy 40 to recognise that enhancement of water bodies and freshwater ecosystems may not be necessary or practicable in all cases and that the policy focus is on the quality of fresh water rather than coastal water.(a) that water quality, flows and water levels and aquatic habitats of water bodies 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;

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.020	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	A requirement to enhance as well as protect the health and well-being of waterbodies and freshwater ecosystems in all situations is onerous and does not recognise the need to provide for regionally significant infrastructure. In the Operative RPS, Policy 40 provides for the 'maintenance' of aquatic ecosystem health in water bodies. The proposed shift from 'maintaining' to 'protecting' the health and well-being of water bodies and freshwater ecosystems creates the potential for the Policy to be interpreted as a proxy avoidance policy and is opposed. 'Maintenance' should be retained in the policy heading, noting that this reflects the direction provided in many of the policy clauses. Clause b relating to water quality in the coastal marine area does not appear to fit within a policy relating to protecting 'the health and well-being of water bodies and freshwater ecosystems', noting that the RMA definition of 'water body' specifically excludes water located within the coastal marine area. Clause b should be deleted.	Delete subclause (b) as follows: (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.
S162 Winstone Aggregates	S162.013	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	There is misalignment between this policy and Policy 18 which uses the terms protecting and restoring as opposed to protecting and enhancing. Clause (h) is not very specific in that it does not provide clear guidance for what is considered 'significant indigenous ecosystems and habitats'. It is not clear what other ecosystems and habitats might be captured by this policy, other than those listed in Appendix 16. The policy should either clearly link to the criteria in Policy 23 or provide another mechanism for clearly identifying 'significant indigenous ecosystems and habitats', until these are fully identified by regional and district councils as required by Policy 23. Clause (n) appears to adopt an avoid approach to the removal or destruction of natural indigenous plants in wetlands (despite there not being a strict avoid requirement in the NPS-FM/ NES. The explanation to this policy purports to give effect to the NPS-FM but doesn't achieve that. Any wording (if retained or aligned with Policy 18) needs to be amended to reflect the NPS-FM 2020 NES and any update.	Align wording with Policy 18 or delete if it is repetitious. Amend wording to provide clear guidance on what constitutes significant indigenous ecosystems. This could be achieved by linking to the criteria in Policy 23. Amend the policy to accurately reflect the direction set in the NPS-FM 2020 and NPS-FM and any update. <i>[Note: Submission reference to prior submission points S162.007 and S162.008]</i>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S163 Wairarapa Federated Farmers	S163.069	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Oppose	Reasons as set out in respect of the proposed objectives for freshwater.	That the amendments to Policy 40 be deleted.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.069	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Policy 40 is poorly drafted and not consistent with Policies 42 and 44 in relation to key matters. Policy 40 requires that, when considering a resource consent, particular regard must be had to giving effect to Te Mana o te Wai. This is poor drafting in that the policy should require that Te Mana o te Wai is given effect to. This can be compared with the Policy 42, which require that Te Mana o te Wai is given effect to and provide a range of matters that particular regard must be had to while giving effect to Te Mana o Te Wai. It is also inconsistent with Policy 44, which sets out outcomes that will be achieved by giving effect to Te Mana o te Wai. A requirement to avoid the loss of extent and values of natural inland wetlands is required. It is not clear how this policy would apply to coastal wetlands.	Replace the introductory words with "When considering an application for a resource consent the regional council must give effect to Te Mana o te Wai by:" Amend Policy 40(a) as follows: (a) requiring that water quality, flows and water levels and aquatic habitats of surface water bodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and wellbeing of water bodies and the health and wellbeing of freshwater ecosystems Add a further item: (x) avoiding the loss of extent or values of natural inland wetlands Make policy amendments to ensure that the NZCPS is given effect to in respect of coastal wetlands, inline with the submission on Policy 18 above, and any consequential amendments to the methods.
S168 Rangitāne O Wairarapa Inc	S168.048	Policy 40: Protecting and enhancing the health and well-being of	Support in part	Rangitāne o Wairarapa support the intent of the policy but consider this should be strengthened. Having 'particular regard' to these matters will not be sufficient to achieve the objectives or give effect to Te Mana o te Wai. These things must be achieved. This policy should be setting up a framework to ensure that things don't get worse, not a framework to which	Amend the policy to: Reword the opening clause of the policy along the lines of the wording used in Policy 42, which states "When considering an application...the regional council must give effect to Te Mana o te Wai and in doing so, must have particular regard to.... "; Minimise effects of the proposal on groundwater recharge

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		water bodies and freshwater ecosystems - consideration		'regard' should be had. In particular, the policy needs to address the situation where target attribute states haven't yet been set; and set a 'maintain' or 'hold the line' framework.	areas... in accordance with environmental flows and levels (clause f) Maintain "ecologically relevant" flows to provide for the health and wellbeing of the water body and freshwater ecosystems, as 'natural flow regimes' can't be maintained if water takes are provided for (clause i); Maintain "or enhance" fish passage (clause k),
S168 Rangitāne O Wairarapa Inc	S168.049	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	The policy needs to address the full range of matters in the NPS FM in relation to natural wetlands until such time as the regional plan is amended in accordance with clause 3.22 of the NPS FM.	Address additional matters in the NPS FM which relate to wetlands - to promote the restoration of natural inland wetlands, and the protection of their values, in particular the values of ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values and amenity value.
S169 Kahungunu Ki Wairarapa	S169.011	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S170 Te Rūnanga o Toa Rangatira	S170.049	Policy 40: Protecting and enhancing the health and well-	Not Stated / Neutral	Policy 40 is important to consider when evaluating consents however it is challenging to identify how developers and land users will implement these considerations and how the impact of Policy 40 (a) is assessed. The Policy requires that water quality, flows and water levels and aquatic habitats of surface water	Amend the provision to address the relief sought.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		being of water bodies and freshwater ecosystems - consideration		bodies are 'managed in a way that gives effect to Te Mana o Te Wai' it is unclear how this will be achieved. One other question related to this matter is that if an integrated view to water and a whole catchment approach is aimed at in this consideration, why this Policy only includes surface water bodies. Couldn't a development and land use activity negatively impact the groundwater?	
S167 Taranaki Whānui	S167.0105	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause to read: (x) the outcomes defined within Te Mahere Wai o Te Kāhui Taiao
S167 Taranaki Whānui	S167.0106	Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause to read: (x) partnering with mana whenua / tangata whenua in resource management and decision making
S16 Kāpiti Coast District Council	S16.052	Policy 41: Controlling the effects of earthworks and	Support	Council supports the proposed deletion of the references to notices of requirement and variations or reviews of district plans, however we note the policy explanation still implies that city and district council resource consent decisions must also consider the policy. We consider it would not be appropriate for city	Amend Policy 41 as follows: Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration When considering an application for a regional resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by;

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		vegetation disturbance - consideration		and district councils to consider the policy in their decision-making functions under the RMA as they have no functions to control activities to achieve target attribute states or discharges to water. Notwithstanding the fact explanatory text to policies have no legal weight under the RMA, we request amendments to clarify that the policy applies only to regional councils.	(a) considering whether the activity will achieve environmental outcomes and target attribute states; and (b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for 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.
S25 Carterton District Council	S25.038	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>While CDC supports a more holistic consideration of the effects of earthworks and vegetation clearance, 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).</p> <p>It is unclear how policies, rules and methods, and subsequent assessment of land use consent applications, should be applied in a district plan context. CDC does not have the capacity to undertake an assessment of the matters described in this policy, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks.</p> <p>Policies, rules and methods addressing these matters are more appropriate in a regional plan and therefore CDC requests that references to district plans are removed from this policy.</p>	Remove reference to district plans from this policy, so that the requirements only apply to regional plans.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S30 Porirua City Council	S30.065	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	<p>The policy represents regulatory overreach and the application of s31 functions to district plan resource consents. These matters are already controlled and managed by the Natural Resources Plan and therefore the policy should be limited to regional consents only. It contains a high level of uncertainty for applicants, councils and other stakeholders. Issues of concern include:</p> <ul style="list-style-type: none"> • The policy applies to all resource consents regardless of scale or activity. It should be restricted to resource consents for earthworks and/or specified vegetation clearance. • It does not provide any guidance or direction as to what environmental outcomes and target attribute states are to be considered. • Discharges to water bodies or onto land where it may enter a waterway are a s30 function, managed under the Natural Resources Plan. • "controlling" indicates a controlled activity status may be appropriate which is inconsistent with (b) where certain discharges are to be avoided and a more restrictive activity status may be required. 	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, including limiting to regional consents only.
S32 Director-General of Conservation	S32.023	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	<p>The proposed changes to this policy would leave a timing gap in its effect until environmental outcomes, target attribute states, and limits have been set. They would also mean that as long as those requirements were met there would be no requirement to minimise erosion and siltation.</p> <p>It is unclear why Notices of Requirement have been deleted</p>	<p>Amend the proposed policy to ensure that:</p> <ul style="list-style-type: none"> • The operative version of Policy 41 applies until such time as environmental outcomes and target attribute states are identified; • All matters in the operative version of Policy 41 remain covered (including considerations for designations, planning processes and minimising erosion)
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.063	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	<p>Support insofar as it pertains to regional functions.</p> <p>This places additional costs on our landowners with unclear/unjustified benefits.</p> <p>Districts and city councils don't control discharges and NPS- FM clause 3.5 (4) refers to managing effects of urban development on water, not discharges.</p>	<p>Amend policy to read: Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration</p> <p>When considering an application for a regional resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by: (a) erosion; and</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration		The urban stormwater network has a regional consent and Council considers this process is better suited to manage any sediment issues.	(a) 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 (b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met. See comment in Policy 40 for inclusion of new district plan specific policy.
S79 South Wairarapa District Council	S79.043	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose in part	As noted previously, the matters in this policy directly relate to the functions in s.30(1)(ii) for regional councils.	Amend policy 41 to clarify that these are for regional consents only.
S100 Meridian Energy Limited	S100.020	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The proposed amendments convert the operative 'minimise' approach into an 'avoid' policy without specifying the threshold standard. The proposed amendments are therefore premature and cannot be properly evaluated for the purpose of section 32 because the key input for the evaluation is missing - i.e. the value of the suspended sediment standard.	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

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>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 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>
<p>S114 Fulton Hogan Ltd</p>	<p>S114.005</p>	<p>Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration</p>	<p>Support in part</p>	<p>While it is important that improvements are made where water quality outcomes are not met, the use of very directive "avoid" policies needs to be very carefully used. It is often not feasible to undertake day to day activities such as construction without having some level of discharge of sediment. If this is phrased as a very stringent "avoid" policy there is the potential that a large number of typical activities could not be undertaken.</p>	<p>(b) avoiding minimising discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S115 Hutt City Council	S115.066	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	No reasons given	Retain as notified
S128 Horticulture New Zealand	S128.042	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	Question whether this policy is necessary, because: <ul style="list-style-type: none"> • Environmental outcomes and target attribute states in (a) are not yet set, presumable also suspended sediment limits under NPSFM • Earthworks is currently managed by regional and district plans, and there is direction elsewhere (in the RPS changes) directing the management in these plans - when they come through apply to consenting. 	Delete Policy 41.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.090	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	<p>Ātiawa supports controls to manage the effects of earthworks and vegetation disturbance, this is a significant resource management issue for Ātiawa.</p> <p>Ātiawa seeks that erosion is considered as part of this policy, it is not clear why this has been removed from the framework as impacts of erosion remain a significant issue in the region.</p> <p>Ātiawa seek that all discharges to water bodies are avoided, regardless whether suspended sediment limits are exceeded or not. Sedimentation of water ways pose significant risk to water quality in the region.</p> <p>In addition, Ātiawa seeks that Te Mana o te Wai, and other mana whenua values are given effect to when considering earthworks and vegetation disturbance</p>	<p>Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration</p> <p>When considering an application for a resource consent, particular regard shall be given to controlling earthworks and vegetation disturbance by: (a) minimising erosion and the runoff of silt and sediment; and</p> <p>(b) considering whether the activity will achieve environmental outcomes and target attribute states; and</p> <p>(c) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met. (d) giving effect to Te Mana o te Wai; and(e) considering the mana whenua values, including mana whenua relationship with their culture, traditions, ancestral lands,</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				Although Atiawa supports the intent to achieve environmental outcomes and target attribute states these have not been determined through the Whaitua process for Ātiawa rohe. In the absence of environmental outcomes and target attributes states we seek to work with Regional Council to ensure that there are appropriate interim measures to assess an proposed activity against.	water, sites, wāhi tapu, and other taonga.
S133 Muaūpoko Tribal Authority	S133.012	Policy 41: Controlling the effects of earthworks and vegetation disturbanc e - considerati on	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S134 Powerco Limited	S134.016	Policy 41: Controlling the effects of earthworks and vegetation disturbanc e - considerati on	Oppose	The implications of the proposed policy wording are unclear as the environmental outcomes, target attribute states and suspended sediment limits referred to have not been set. It is uncertain whether those thresholds will be appropriate in the context of short term activities such as construction earthworks, particularly in the context that clause b sets an avoidance approach. For example, dewatering discharges can result in a short term exceedance of suspended sediment thresholds during the first flush, even where best practice is applied to the management of dewatering activities. This is commonly accepted as appropriate, subject to appropriate conditions and management approaches, across the country. Complete avoidance of such discharges is unlikely to be practicable.	Amend Policy 41 by retaining the wording used in the operative RPS, 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 (a) (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 (b) avoiding discharges to water bodies, and to land where it may enter a

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>waterbody, where limits for 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. This policy provides for consideration of earthworks and vegetation disturbance to minimise erosion and sediment runoff prior to plan controls being adopted by regional and district plans in accordance with policy 15. This policy shall cease to have effect once method 31 is implemented and policy 15 is given effect to in regional and district plans. Policies 15 and 41 are to ensure that Wellington Regional Council and district and city councils integrate the control earthworks and vegetation disturbance in their regional and district plans. Method 31 is for Wellington Regional Council and district and city councils to develop a protocol for</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					earthworks and erosion from vegetation disturbance. The protocol will assist with implementation of policies 15 and 41. Some activities - such as major road construction - are likely to require resource consents from both Wellington regional council and district or city councils, which will work together to control the effects of the activity. Vegetation disturbance includes harvesting plantation forestry"
S140 Wellington City Council (WCC)	S140.068	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Support as proposed.	Retain as notified.
S147 Wellington Fish and Game Council	S147.067	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.021	Policy 41: Controlling the effects of earthworks and vegetation	Oppose	The implications of the proposed policy wording are unclear as the environmental outcomes, target attribute states and suspended sediment limits referred to have not been set. It is uncertain whether those thresholds will be appropriate in the context of short term activities such as construction earthworks, particularly in the context that clause b sets an avoidance approach. For	Amend Policy 41 by retaining the wording used in the operative RPS as follows: Policy 41: Controlling Minimising the effects of earthworks and vegetation disturbance - consideration

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		disturbance - consideration		example, dewatering discharges can result in a short term exceedance of suspended sediment thresholds during the first flush, even where best practice is applied to the management of dewatering activities. This is commonly accepted across the country as appropriate, subject to appropriate conditions and adoption of best practice management approaches. Complete avoidance of such discharges is unlikely to be practicable.	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(b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.022	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	The implications of the proposed policy wording are unclear as the environmental outcomes, target attribute states and suspended sediment limits referred to have not been set. It is uncertain whether those thresholds will be appropriate in the context of short term activities such as construction earthworks, particularly in the context that clause b sets an avoidance approach. For example, dewatering discharges can result in a short term exceedance of suspended sediment thresholds during the first flush, even where best practice is applied to the management of dewatering activities. This is commonly accepted across the country as appropriate, subject to appropriate conditions and adoption of best practice management approaches. Complete avoidance of such discharges is unlikely to be practicable.	Amend Policy 41 by retaining the wording used in the operative RPS, 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

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					<p>recognising that erosion, siltation and sedimentation effects can not always be completely avoided. This policy provides for consideration of earthworks and vegetation disturbance to minimise erosion and sediment runoff prior to plan controls being adopted by regional and district plans in accordance with policy 15. This policy shall cease to have effect once method 31 is implemented and policy 15 is given effect to in regional and district plans. Policies 15 and 41 are to ensure that Wellington Regional Council and district and city councils integrate the control earthworks and vegetation disturbance in their regional and district plans. Method 31 is for Wellington Regional Council and district and city councils to develop a protocol for earthworks and erosion from vegetation disturbance. The protocol will assist with implementation of policies 15 and 41. Some activities - such as major road construction - are likely to require resource consents from both Wellington regional council and district or city councils, which will work together to control the effects of the activity. Vegetation disturbance includes harvesting plantation forestry.</p> <p><i>[Note: Submission related to prior submission point S157.021]</i></p>
<p>S162 Winstone Aggregates</p>	<p>S162.014</p>	<p>Policy 41: Controlling the effects of</p>	<p>Support in part</p>	<p>Generally supports this policy and requests minor amendments for consistency between the heading and the policy text.</p>	<p>Amend. Policy 41: Controlling Managing the effects of</p>

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		earthworks and vegetation disturbance - consideration			earthworks and vegetation disturbance
S163 Wairarapa Federated Farmers	S163.070	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Oppose	Defer to the full review of the RPS in 2024; and/or the NRP changes scheduled in 2023 and 2024, for reasons as set out in respect of Policy 15. Refer to submission for more detail.	That the amendments to Policy 41 be deleted.
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	Support in part	Amendments needed to ensure this policy aligns with the direction in the NSPFM, for example, its Objective and Policies 1, 3 and 9. Additional clause needed to ensure the maintenance and enhancement of coastal water quality is not overlooked and the NZCPS is also given effect to.	Amend as follows: Policy 41: Controlling Minimising the effects of earthworks Earthworks and vegetation disturbance - consideration 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 controlling for earthworks and or vegetation disturbance by to minimise, give effect to Te Mana o te Wai by: (a) erosion; and (a) considering whether the activity will achieve achieving 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 (b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					sediment are not met; Include an additional clause addressing coastal environments: (x) when assessing an application for a resource consent for earthworks or vegetation clearance and any associated discharge of contaminant ensure that the activity avoids adverse effects on aquatic ecosystem health, indigenous biodiversity in coastal water and receiving environments
S168 Rangitāne O Wairarapa Inc	S168.050	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	Rangitāne o Wairarapa consider that this policy should be setting up a 'make sure it doesn't get worse' framework, not a 'regard to' one. In particular the policy should address the situation where target attribute states haven't been set yet; and set a 'maintain' framework. Clause (b) confuses 'limits', which are rules, with 'target attribute states', which are the water quality standards.	Amend the policy to: Reword the opening clause of the policy along the lines of the wording used in Policy 42, which states "When considering an application...the regional council must give effect to Te Mana o te Wai and in doing so, must have particular regard to.... "; Maintain current water quality, until environmental outcomes and target attribute states are in place; Reword clause b so that it refers to target attribute states;
S168 Rangitāne O Wairarapa Inc	S168.051	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support in part	The explanatory text refers to the intention of the policy being to 'minimise' effects. This does not accurately reflect the direction of the NPS FM, which is to manage to limits and target attribute states.	Delete the word 'minimise' from the explanatory text and refer instead to the need to manage activities to achieve limits and target attribute states.
S170 Te Rūnanga o Toa Rangatira	S170.051	Policy 41: Controlling the effects of earthworks and vegetation	Support	From this a good segue way is, the Policy 41 Controlling the effects of earthworks and vegetation disturbance - consideration as per the comments above, 'minimising' can be strengthened to say controlled or avoided. We agree that this needs to be a consideration.	Retain as notified.

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		disturbance - consideration			
S167 Taranaki Whānui	S167.0107	Policy 41: Controlling the effects of earthworks and vegetation disturbance - consideration	Support	Taranaki Whānui supports the amendments to Policy 41	Retain as notified.
S16 Kāpiti Coast District Council	S16.053	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	Council supports the applicability of the policy to regional consents only and request this is not changed to include city and district councils.	Retain
S30 Porirua City Council	S30.066	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Oppose	These are all matters that are all relevant to a regional council under s30 of the RMA.	Amend policy so that it applies to regional consents only: When considering an application for a regional resource consent the regional council must give effect to Te Mana o te Wai and in doing so must have particular regard to:
S32 Director-General of	S32.024	Policy 42: Effects on freshwater	Support in part	The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area.	Retain as notified, except for the following changes or words to like effect: (j) Require that urban development is located and designed

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Conservation		and the coastal marine area from urban development - consideration		They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.	to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries and the coastal marine area;
S32 Director-General of Conservation	S32.025	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	<p>The proposed new provisions are appropriate in giving effect to the NPSFM 2020. However, they do not consistently include the coastal marine area.</p> <p>They also do not address the impacts of development which constrains the ability of streams and rivers to move and meander naturally, which adversely affects their health and well-being and their extent and values.</p>	add a new clause: "Require that urban development is located and designed to allow water bodies to meander and move naturally".
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.064	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	Support amendment to apply to regional consents only.	Retain the policy as notified, as regional consents only.
S113 Wellington Water	S113.018	Policy 42: Effects on freshwater and the coastal marine area from urban developme	Support in part	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 policy 42(k): Require hydrological controls to reduce the adverse effects of excess stormwater volume on stream bank scour and aquatic ecosystem health;

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		nt - considerati on			
S113 Wellington Water	S113.033	Policy 42: Effects on freshwater and the coastal marine area from urban developme nt - considerati on	Oppose	The linking between the stem and subclauses of the policy need different wording	Amend links for grammatical consistency through the whole policy. For instance: (a) adopting an integrated approach...
S113 Wellington Water	S113.034	Policy 42: Effects on freshwater and the coastal marine area from urban developme nt - considerati on	Oppose	Minimise and maximise are only appropriate if defined in accordance with the pNRP (clause (l))	Retain "minimise" and "maximise" in clause (l) only if defined in accordance with the pNRP.
S113 Wellington Water	S113.035	Policy 42: Effects on freshwater and the coastal marine area from urban developme nt - considerati on	Oppose	Clause (r) should be redrafted as integrated management is a very broad term and a catchment approach is more appropriate in this context.	Amend subclause: (r) applying a catchment approach (ki uta ki tai) an integrated management approach to managing wastewater networks including partnering with mana whenua, as kaitiaki, and allowance for appropriately designed overflow points where necessary to support growth and consideration of different approaches to wastewater management to resolve overflows.
S113 Wellington Water	S113.036	Policy 42: Effects on freshwater	Not Stated / Neutral	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	Insert new Policy 42A as follows: Policy 42A: Effects on freshwater from urban development -

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and the coastal marine area from urban development - consideration		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.	district plans District plans shall include policies and methods to:(a) Support and achieve efficient end use of reticulated water, and alternate water supplies for non-potable uses(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.
S115 Hutt City Council	S115.067	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support	No reasons given	Retain as notified
S118 Peka Peka Farm Limited	S118.012	Policy 42: Effects on freshwater and the coastal marine area from urban development -	Support in part	Policy 42 is a consideration policy relevant to effects on freshwater and the coastal marine area. The policy specifies 18 matters that must be considered. As for Policy FW.3 above, the number of matters specified makes the policy cumbersome and difficult to interpret. Supports the intent of the policy but seeks that the drafting of the policy be improved, including by removing any unnecessary duplication of the NPS-FM or other RPS policies.	Amend Policy 42 to address the relief sought in the submission.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.091	Policy 42: Effects on freshwater and the coastal marine area from urban developme nt - considerati on	Support	Ātiawa supports the considerations applied to this policy, and the intent of the policy to manage the effects of urban development on freshwater and the coastal and marine area.	Retain as notified.
S133 Muaūpoko Tribal Authority	S133.013	Policy 42: Effects on freshwater and the coastal marine area from urban developme nt - considerati on	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S147 Wellington Fish and Game Council	S147.068	Policy 42: Effects on freshwater and the coastal marine area from urban developme nt - considerati on	Support	Necessary to give effect to the NPS-FM.	. Retain as notified.
S148 Wellington Internation	S148.037	Policy 42: Effects on freshwater and the	Oppose in part	WIAL is concerned that this policy has applied the National Policy Statement for Freshwater Management 2020 concepts to the coastal marine area. There are separate provisions relating to the management of the	Delete reference to the coastal marine area in this policy. Ensure it only applies to freshwater and is consistent with the National Policy Statement for Freshwater Management

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
al Airport Ltd (WIAL)		coastal marine area from urban development - consideration		coastal environment and coastal marine area in the RPS.	2020.
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	Oppose	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately</p>	<p>amend subclause (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>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</p>	<p>S157.036</p>	<p>Policy 42: Effects on freshwater and the coastal marine area from urban development -</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, 	<p>amend subclause</p> <p>(h) The extent to which Require that urban development is located and designed and constructed using the principles of Water Sensitive Urban Design;</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration		<p>earthworks and vegetation clearance;</p> <ul style="list-style-type: none"> - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for</p>	

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</p>	<p>S157.037</p>	<p>Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that</p>	<p>amend subclause</p> <p>(i) The extent to which Require that urban development is located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours;</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p>S157 BP Oil NZ Ltd, Mobil Oil</p>	<p>S157.038</p>	<p>Policy 42: Effects on freshwater and the</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements</p>	<p>amend subclause</p> <p>(j) The extent to which Require that urban</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Ltd and Z Energy Ltd		coastal marine area from urban development - consideration		<p>with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes,</p>	development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</p>	<p>S157.039</p>	<p>Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. 	<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>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as</p>	

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<p>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</p>	<p>S157.040</p>	<p>Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration</p>	<p>Oppose</p>	<p>distinct to piping) which are likely to remain appropriate in some situations.</p> <p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils. Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks</p>	<p>amend subclause</p> <p>(l) The extent to which Require subdivision, use and development stormwater quality management that will minimises the generation of contaminants in stormwater, and maximises, to the extent practicable, the removal of contaminants from stormwater;</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
<p>S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd</p>	<p>S157.041</p>	<p>Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration</p>	<p>Oppose</p>	<p>Policies 14 and FW.3 require that regional and district plans, respectively, give effect to Te Mana o te Wai, including by addressing a number of matters listed in each of the policies. Policy 42 sets similar requirements with respect to the consideration of resource consent applications by regional councils.</p> <p>Each of the three policies contain clauses setting directive requirements that urban development must achieve in relation to:</p> <ul style="list-style-type: none"> - meeting regional plan limits for stormwater discharges, earthworks and vegetation clearance; - Water Sensitive Urban Design; - Minimising the extent and volume of earthworks and following existing land contours; - Protecting and enhancing enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and 	<p>amend subclause.</p> <p>(m) Require The provision of riparian buffers for all waterbodies and avoid piping of rivers;</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>estuaries;</p> <ul style="list-style-type: none"> - Riparian buffers and avoiding the piping of rivers; - Hydrological controls; - Stormwater quality management to minimise the generation of contaminants and maximum the removal of contaminants. <p>While the intent is supported, the wording of these provisions as a whole is both too absolute and too uncertain.</p> <p>The policies set strict requirements to be achieved, that do not incorporate the level of discretion provided for in the NPS-FW. For example, the requirement that development, stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan is opposed. If such limits were met there would, presumably, be no need for a resource consent to be sought in the first place. Nor is it currently known what those limits might be and if they will appropriately provide for all types of discharges. There may be situations in which small scale and/or short-term exceedances of limits are acceptable, for example elevated sediment levels during the first flush of a construction dewatering discharge.</p> <p>A requirement that the extent and volume of earthworks be minimised, may not be achievable in all situations, for example in the event of the unexpected discovery of contaminated soil, which requires subsequent remediation work.</p> <p>The requirement in each of the policies to avoid all adverse effects from stormwater runoff volumes, through the use of hydrological controls, is opposed. It is unclear what adverse effects the policies seek to avoid, and complete avoidance of all adverse effects in all circumstances is unlikely to be achievable. This is particularly the case in the context of the definition of 'hydrological control', which is uncertain and, for brownfield and infill development contains discretion around the extent to which the mean annual runoff volume should be reduced. In many cases natural stream flows will be affected by a range of factors (other stormwater discharges, modification of stream channels etc), such that it will not be possible for a</p>	

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>single development to 'maintain natural stream flows'. Stormwater quality are typically generated by the way in which land is used or developed, not by stormwater quality management.</p> <p>A requirement to avoid piping of rivers is supported in principle, provided provision is made for culverts (as distinct to piping) which are likely to remain appropriate in some situations.</p>	
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.071	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	<p>As in Policy 40, Policy 42 conflates "giving effect to" and "having particular regard to". These are separate concepts and the Council should be giving effect to Te Mana o te Wai</p>	<p>Amend the introductory words as follows: When considering an application for a resource consent the regional council must give effect to Te Mana o te Wai by: Make consequential amendments, for example, in (a) adopt would need to be amended to adopting for the provision to make sense</p>
S168 Rangitāne O Wairarapa Inc	S168.052	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	<p>As currently worded, this policy applies much more broadly than to just urban development. If that is all it is intended to cover, then some of the matters may need narrowing. However, confining the scope of this policy in this manner would not be an approach that Rangitāne o Wairarapa would support.</p> <p>Restricting the scope of the policy in this way is neither appropriate, efficient or effective, and neither will it give full effect to the NPS FM.</p>	<p>Amend the policy: So that a consistent grammatical tense is used throughout the policy; So that urban development achieves the target attribute states and environmental flows set for the catchment (clause f and g), not just activity limits; So that it applies to all development, not just 'urban development' (which is undefined by the plan change), in order to efficiently and effectively achieve integrated management.</p>
S169 Kahungunu Ki Wairarapa	S169.012	Policy 42: Effects on freshwater and the coastal marine area from urban development -	Support	<p>On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise</p>	Retain as notified

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration		that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	
S170 Te Rūnanga o Toa Rangatira	S170.052	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Not Stated / Neutral	'Minimising contamination' is not adequate wording for the intention of the Policy. It is ideal this consideration to Policy 42 is reworded to say, no contamination in stormwater.	'Minimising contamination' is not adequate wording for the intention of the Policy. Reword to say, no contamination in stormwater.
S167 Taranaki Whānui	S167.0108	Policy 42: Effects on freshwater and the coastal marine area from urban development - consideration	Support in part	Support with further direction for partnership in decision making	Insert a new clause: (x) partnering with mana whenua / tangata whenua in resource management and decision making
S115 Hutt City Council	S115.068	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Support the deletion of this policy	Delete POLICY 43 as proposed
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.092	Policy 43: Protecting aquatic ecological function of water bodies -	Support	Ātiawa supports deletion of this policy as these matters are provided for in a more holistic manner through Policy 41 and Policy 42.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S140 Wellington City Council (WCC)	S140.069	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Support the deletion of this policy.	Delete Policy 43 as proposed.
S170 Te Rūnanga o Toa Rangatira	S170.053	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	How do we identify resource consents' ability to demonstrate the 'contribution to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems'? There is need for resource consents to show the environmental progress they are demonstrating in the application and proposal. It is unclear how this would be evaluated. Even in the cases of drafting clauses in consents, may not be doing much- what is our benchmark and how do we measure and label what is an ecosystem achievement? The consideration may not provide applicants and consent processing staff enough clarity and certainty to describe what is a contribution. Contribution as a word can be stronger; if this is a consideration it needs to match its empowering qualities and the level of higher order policy execution.	Require resource consents to demonstrate environmental progress to the 'contribution to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems'. Clarify how this would be evaluated (e.g. benchmarks and how this is measured) Strengthen the wording of the provision (e.g. replace 'contribution' for a stronger word).
S167 Taranaki Whānui	S167.0109	Policy 43: Protecting aquatic ecological function of water bodies - consideration	Support	Taranaki Whānui supports the deletion of this policy	Retain as notified.
S30 Porirua City Council	S30.067	Policy 44: Managing water takes and use to give effect to Te	Oppose	These are all matters that are all relevant to a regional council under s30 of the RMA. A notice of requirement does not involve or give any form of approval for the take or use of water, which require resource consents from the regional council.	Amend policy so that it applies to regional consents only, and not notices of requirement: When considering an application for a regional resource consent, notice of requirement, or a change, variation or review of a regional plan to

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		Mana o te Wai - consideration		<p>These are beyond the scope of what can be considered by a requiring authority or a territorial authority through a notice of requirement.</p> <p>This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional plans</p>	take and use water, Te Mana o te Wai must be given effect to so that:
S86 Irrigation New Zealand (Irrigation NZ)	S86.002	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	The implementation of the NPS-HPL must be considered in the RPS Change 1, as well as to achieve balance between NPS-UD, NPS-FM and NPS-HPL when either policy reaches the limitations in practice.	Amendment of Policy 44 to give effect to the National Policy Statement on Highly Productive Land 2022 (NPS-HPL).
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.048	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Considers that Policy 44 should be a regulatory policy, rather than a "Matter to be considered". This will ensure appropriate emphasis of the policy is applied and to give effect to the overarching Resource Management objective.	Amend Policy 44 to be a regulatory policy.
S113 Wellington Water	S113.037	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Clause (d) should reflect the variation in waterbody flow levels across the seasons. This will encourage water providers to take more water when it is readily available.	<p>Amend clause (d)</p> <p>(d) Take limits (minimum flows and allocation limits) are achieved that provide for flow or level variability, safeguard ecosystem health, reflect annual and seasonal water cycles, provide for the life cycle needs of aquatic life, and take into account environmental outcomes</p>
S113 Wellington Water	S113.038	Policy 44: Managing water	Support in part	Clause (h) should be altered for clarity and public health outcomes	<p>Amend clause (d)</p> <p>(h) There is consideration of alternate water supplies (only non-potable in urban areas) such as</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		takes and use to give effect to Te Mana o te Wai - consideration			storage or capture harvesting of rainwater for use during the drier summer months
S115 Hutt City Council	S115.069	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	No reasons given	Retain as notified
S128 Horticulture New Zealand	S128.043	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Subclauses (c) and (e) are too specific given NPSFM process for whaitua which set the environmental flows and levels, and take limits through the NPSFM 2020 process. In addition: <ul style="list-style-type: none"> • Take limits need to be set to meet environmental flows and levels, so there is not a need to include both; • Take limits will be set to provide for freshwater values, therefore it is not necessary to state the additional text. 	Replace subclauses (c) and (d) with new clause: (c) Where take limits have been set, take limits are achieved; (c) Environmental flows and levels, including variability of flows, are achieved; (d) Take limits are achieved that provide for flow or level variability, safeguard ecosystem health, provide for the life cycle needs of aquatic life, and take into account environmental outcomes;
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.093	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Ātiawa support the amendments made to Policy 44 to better provide for mana whenua values, including Māori freshwater values, achieving overall ecosystem health, and giving effect to Te Mana o te Wai in regards to water takes and use. Ātiawa seeks specific reference to the hierarchy of obligations to ensure that water takes and use are considered against the national legislation. Additionally, Ātiawa seeks reference to ki uta ki tai, to	Policy 44: Managing water take and use to give effect to Te Mana o te Wai- consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional plan to take and use water, Te Mana o te Wai must be given effect to so that: (a) Māori freshwater values, including mahinga kai are provided for; (b) sites of significance, wāhi tapu and wāhi tupuna are protected; (bb) the hierarchy of obligations is provided for; (bc) integrated management, ki

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				acknowledge the impact of a water take and usage on the entire water cycle, and the wider ecosystem.	<p>uta ki tai is considered;</p> <p>(c) Environmental flows and levels, including variability of flows, are achieved;</p> <p>(d) Take limits are achieved that provide for flow or level variability, safeguard ecosystem health, provide for the life cycle needs of aquatic life, and take into account environmental outcomes;</p> <p>(e) the applicant has demonstrated that the volume of water sought is reasonable and justifiable for the intended use, including consideration of soil and crop type when water is taken for irrigation purposes;</p> <p>(f) requiring the consent holder to measure and report the actual amount of water taken;</p> <p>(g) requiring the consent holder to adopt water conservation and demand management measures and demonstrate how water will be used efficiently; and</p> <p>(h) there is consideration of alternate water supplies such as storage or capture of rainwater for use during the drier summer months</p>
S133 Muaūpoko Tribal Authority	S133.014	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - considerati on	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.
S136 DairyNZ	S136.017	Policy 44: Managing water takes and use to give	Oppose	Delay inclusion of the changes of this until all of the NPS-FM can be implemented into the full RPS review. This will allow for further clarity about what Te Mana o te Wai will mean at a regional level as well as the	Delete policy and address the issue through a full review of the RPS.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		effect to Te Mana o te Wai - consideration		outcomes of the Water Allocation Review in Method 48 to be considered.	
S140 Wellington City Council (WCC)	S140.070	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Support as proposed.	Retain as notified.
S144 Sustainable Wairarapa Inc	S144.041	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	It is unlikely that large scale water storage can give effect to Te Mana o te Wai.	Amend clause (h) Alternate water supplies such as storage or capture of rainwater should be defined to be for public water supply or at on-site farm scale or smaller.
S145 Wairarapa Water Users Society	S145.002	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	This would appear to be an additional requirement for new consents and the renewal of existing consents. There are existing limitations to avoid water sources becoming over-allocated and the need for applicants to consider alternatives is unnecessary.	Removal of the new clause (h) (h) there is consideration of alternative water supplies such as storage or capture of rainwater for use during the drier summer months
S147 Wellington Fish and Game Council	S147.015	Policy 44: Managing water takes and use to give effect to Te Mana o te	Support in part	Strongly support the proposed changes to Policy 44 in order to give effect to the NPS-FM and incorporate the concept of Te Mana o te Wai. However, as drafted the proposed changes to Policy 44 do not give proper effect to Policies 9 and 10 of the NPS-FM, which specifically recognise the need for the protection of the habitats of indigenous freshwater	new subclause: (ba) The habitats of indigenous freshwater species, trout and salmon are protected; "

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		Wai - consideration		species, trout, and salmon. The suggested amendment is intended to address this deficiency.	
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.042	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	The intent of the policy is supported. However, 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. Editorial changes are required to the wording of clauses (f) and (g) to ensure they relate appropriately to the amended chapeau, which requires Te Mana o te Wai to 'be given effect to'.	amend subclause. (f) requiring the consent holders are required to measure and report the actual amount of water taken; and
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.043	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose in part	The intent of the policy is supported. However, 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. Editorial changes are required to the wording of clauses (f) and (g) to ensure they relate appropriately to the amended chapeau, which requires Te Mana o te Wai to 'be given effect to'.	amend subclause (g) requiring the consent holders are required to adopt water conservation and demand management measures and demonstrate how water will be used efficiently; and
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.044	Policy 44: Managing water takes and use to give	Oppose in part	The intent of the policy is supported. However, 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.	introduce new subclause. (i) appropriate provision is made for temporary dewatering activities necessary for construction or maintenance.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		effect to Te Mana o te Wai - consideration		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. Editorial changes are required to the wording of clauses (f) and (g) to ensure they relate appropriately to the amended chapeau, which requires Te Mana o te Wai to 'be given effect to'.	
S163 Wairarapa Federated Farmers	S163.071	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Oppose	As set out in relation to objectives for freshwater. More specifically, any amendments should not apply to s14(3) takes. Refer to submission for more details on other specific concerns. Alternatively, the proposed new over-arching Objective B is intended to provide a pathway towards a similar result. .	That the amendments to Policy 44 be deleted.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.072	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	Gives effect to the NPSFM Objective and Policies	Retain
S168 Rangitāne O Wairarapa Inc	S168.053	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai -	Support in part	Restricting the scope of the policy in this way is neither appropriate, efficient or effective, and neither will it give full effect to the NPS FM.	Amend the policy: So that a consistent grammatical tense is used throughout the policy.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S169 Kahungunu Ki Wairarapa	S169.004	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified
S169 Kahungunu Ki Wairarapa	S169.014	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support	On behalf of a mandated iwi organisation, Kahungunu Ki Wairarapa, I, Rawiri Smith, an Environmental Manager for Kahungunu Ki Wairarapa would like to express our support for the iwi expressions of Te Mana o Te Wai in the proposed Regional Policy Statement of Greater Wellington 2022. I do this because it follows the process set out in regulation, namely the Resource Management Act and the key policies in the National Policy Statement for Freshwater Management. By being in line with these two statutes we can recognise that the proposed Te Mana o Te Wai sections fulfill the intent of both regulations.	Retain as notified.
S170 Te Rūnanga o Toa Rangatira	S170.054	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Not Stated / Neutral	Policy 44 Managing water take and use to give effect to Te Mana o Te Wai - consideration This consideration needs to consider the needs of iwi and Māori and should be able to give flexibility to the needs of Mana Whenua.	Policy 44 Managing water take and use to give effect to Te Mana o Te Wai - consideration This consideration needs to consider the needs of iwi and Māori and should be able to give flexibility to the needs of Mana Whenua.
S167 Taranaki Whānui	S167.0110	Policy 44: Managing water takes and use to give	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause: (x) the outcomes defined within Te Mahere Wai o Te Kāhui Taiao are achieved

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		effect to Te Mana o te Wai - consideration			
S167 Taranaki Whānui	S167.0111	Policy 44: Managing water takes and use to give effect to Te Mana o te Wai - consideration	Support in part	Support with inclusion of direct reference to outcomes of Te Mahere Wai o Te Kāhui Taiao and further direction for partnership in decision making	Insert a new clause: (x) mana whenua / tangata whenua are partner in resource management and decision making.
S16 Kāpiti Coast District Council	S16.056	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Council considers the matters in the policy are important considerations, particularly where new urban development is proposed. We request the use of the verb consideration in the policy heading is transferred into the policy wording to avoid inconsistency with the structure of the RPS and the consideration focus of the policy.	Amend Policy FW.5 as follows: Policy FW.5: Water supply planning for climate change and urban development - consideration When considering a change, variation or review of a regional or district plan particular regard consideration shall be given to: (a) ... Explanation Policy FW.5 requires water supply planning to adequately considered including consider the impacts of climate change and new urban development.
S25 Carterton District Council	S25.039	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Retain the policy.	Retain the policy.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S30 Porirua City Council	S30.068	Policy FW.5: Water supply planning for climate change and urban development - consideration	Oppose	Council opposes this policy and seeks its deletion. These are matters that are addressed in Long Term Plans, Asset Management Plans, and will be considered in the Wellington region Future Development Strategy. Soon, they are likely to fall within the ambit of the Three waters entity. It is unclear how these requirements align with the existing requirements of the NES for Sources of Human Drinking Water	Delete policy.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.048	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Council supports the intent but considers that the policy should be specific to changes, variations or reviews which deal with public potable water supply only.	Amend to read: When considering a change, variation or review of a regional or district plan which includes a requirement for a public potable water supply particular regard shall be given to..... (a) climate change impacts on public potable water supply, including water availability and demand..."
S79 South Wairarapa District Council	S79.044	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Policy FW.5 does not assist in resolving the numerous conflicts between resources within this plan change. In particular, the ability to deliver long term affordable growth, while significantly increasing environmental protections. Where growth has been planned in conjunction with the community, mana whenua and other stakeholders, the protection and enabling of municipal water takes, subject to te mana o te wai and a range of 'use management' including efficiency measures, should be protected.	Amend Policy FW.5 as follows: When considering a change, variation or review of a regional or district plan particular regard shall be given to: (a) climate change impacts on water supply, including water availability and demand; (b) demand from future population projections, growth strategies adopted by Councils, and the ability to deliver well functioning urban environments; (c) development of future water sources, storage, treatment and reticulation; and (d) protection of existing and future water sources. Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					relief sought
S113 Wellington Water	S113.039	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Clause (a) needs to reflect the potential for saline intrusion into the aquifer	(a) climate change impacts on water supply, including water availability and demand, including the potential for saline intrusion into the aquifer;
S113 Wellington Water	S113.040	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Clause (d) needs to reflect ki uta ki tai for protection of water sources	(d) protection of existing and future water sources identified in Source Water Risk Management Plans and including by via a catchment approach (ki uta ki tai).
S113 Wellington Water	S113.041	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	A new clause should be added to support the importance of water demand management in achieving Te Mana o te Wai.	Insert new clause (e) The benefits from, and implications for, water demand management.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S115 Hutt City Council	S115.070	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	No reasons given	Retain as notified
S128 Horticulture New Zealand	S128.044	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	This policy should not just be limited to urban development.	Amend Policy FW.5 as follows:Water supply planning for climate change and urban development - consideration
S128 Horticulture New Zealand	S128.045	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	Support regard being given to climate change impacts and development of water storage.	Amend as follows:(c) development of future water sources, storage, treatment and reticulation, including water storage schemes; and
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.094	Policy FW.5: Water supply planning for climate	Support in part	Ātiawa supports water supply planning for climate change and urban development. Ātiawa is not clear why the approach in the policy only applies to a change, variation, or review of a regional or district plan. Ātiawa	Amend to: Policy FW.5: Water supply planning for climate change and urban development - consideration When considering an application for resource consent , change, variation or review of a regional

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		change and urban development - consideration		seeks that this policy also apply to resource consent applications to ensure that water supply planning is considered as part of resource consent applications.	or district plan particular regard shall be given to: (a) climate change impacts on water supply, including water availability and demand; (b) demand from future population projections; (c) development of future water sources, storage, treatment and reticulation; and (d) protection of existing and future water sources
S140 Wellington City Council (WCC)	S140.071	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support	Support as proposed.	Retain as notified
S144 Sustainable Wairarapa Inc	S144.042	Policy FW.5: Water supply planning for climate change and urban development - consideration	Support in part	At present there is no specific work to protect of 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.	Protection of water sources should be achieved by the combined actions of all affected councils and DoC.
S147 Wellington Fish and Game Council	S147.069	Policy FW.5: Water supply planning for climate change and urban	Support	Necessary to give effect to the NPS-FM.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		developme nt - considerati on			
S163 Wairarapa Federated Farmers	S163.072	Policy FW.5: Water supply planning for climate change and urban developme nt - considerati on	Oppose	Reasons as set out in respect of freshwater objectives. Concerned that the intent appears to be restricted to a concern for urban supplies and urban growth projections - and not rural supplies and primary production values. Refer to submission for more detail. The proposed over-arching Objective B is intended to provide a pathway towards a similar result.	That Policy FW.5 be deleted.
S165 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 developme nt - considerati on	Oppose in part	Further amendments are required to ensure this policy meets the NPSFM objective and policies.	Amend the pōtai to Policy FW.5 as follows: When considering a change, variation or review of a regional or district plan give effect to the hierarchy of obligations in Te Mana o te Wai, as set out in Objective 2.1 of the NPSFM 2020 and have particular regard shall be given to:
S167 Taranaki Whānui	S167.0112	Policy FW.5: Water supply planning for climate change and urban developme nt - considerati on	Support	Taranaki Whānui supports the new Policy FW.5	Retain as notified.
S20 Mangaroa	S20.003	Policy 47: Managing	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Peatland Focus Group_Paul Dyson		effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration		<p>with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.</p> <p>To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	<p>zone. Undertake extensive community consultation prior to issuing a consultation document.</p>
S21 Mangaroa Peatland Focus Group_Liorah Atkinson	S21.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.</p>	<p>Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.</p>
S23 Mangaroa Peatland Focus Group_Ian Spendlove	S23.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that</p>	<p>Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		values - consideration		might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S26 Mangaroa Peatland Focus Group_Andrea Follett	S26.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S31 Robert Anker	S31.026	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would be impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. Not only will there need to be effective consultation with the landowner where the SNA is situated but there would also need to be another layer of consultation for those landowners within the buffer zone. This concept has not been thoroughly thought through and GWRC has failed in its obligation to consult.	GWRC to clearly define the concept of buffering including all relevant factors and rules that would apply to the buffer zone. GWRC to undertake extensive community consultation prior to issuing a consultation document. It is not acceptable for GWRC to be left to make up detailed regulations on the fly.
S33 Mangaroa Peatland Focus Group_Sandy, Judith,	S33.003	Policy 47: Managing effects on indigenous ecosystems and habitats	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Kauika-Stevens		with significant indigenous biodiversity values - consideration		To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.078	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose	Council is concerned that this policy aims to direct territorial authorities in advance of identifying indigenous ecosystems under Policy 23 and 24 (the timelines of which Council opposes). It is impractical to apply requirements, or consider whether a proposed activity is inappropriate, ahead of the NPS-IB or appropriately considered criteria and is likely to result in inconsistencies should changes be made to Policy 23 and 24.	Retain as operationally written and review once NPS-IB has been gazetted.
S38 Mangaroa Peatland Focus Group_Heather McKay	S38.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S39 Mangaroa Peatland	S39.003	Policy 47: Managing effects on	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Focus Group_Col in Hawes		indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration		There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Undertake extensive community consultation prior to issuing a consultation document.
S40 Mangaroa Peatland Focus Group_Lauritz & Julie Rust	S40.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S41 Mangaroa Peatland Focus Group_Andrew Ayrton & Carol Reeves	S41.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values -	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed,	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration		there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S42 Mangaroa Peatland Focus Group_Gregor & Stephanie Kempt	S42.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S43 Mangaroa Peatland Focus Group_Carol Dormer	S43.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S44 Mangaroa Peatland Focus Group_Richard Dormer	S44.003	Policy 47: Managing effects on indigenous ecosystems and habitats	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		with significant indigenous biodiversity values - consideration		To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S45 Mangaroa Peatland Focus Group_ Weston Hill	S45.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S46 Mangaroa Peatland Focus Group_ Lyne Hill	S46.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S47 Mangaroa Peatland Focus Group_Norman Hill	S47.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S48 Mangaroa Peatland Focus Group_Duncan Carmichael	S48.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S52 Gerald Keown Mangaroa Peatland Focus Group	S52.004	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn,	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		biodiversity values - consideration		what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S54 Mangaroa Peatland Focus Group_Helen Masters	S54.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S55 Mangaroa Peatland Focus Group_Matthew Scrimshaw	S55.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S57 Colleen Munro_Mangaroa	S57.004	Policy 47: Managing effects on indigenous	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Peatland Focus Group		ecosystems and habitats with significant indigenous biodiversity values - consideration		any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	issuing a consultation document.
S58 Grant Munro Mangaroa Peatland Focus Group	S58.004	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S59 Mangaroa Peatland Focus Group_Sandra & Mat Gerrard	S59.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S62 Philip Clegg	S62.025	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	GWRC be required to clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. GWRC be required to collaborate closely with the community in developing rules to ensure workability.
S87 Roger O'Brien_Mangaroa Peatland Focus Group_	S87.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S91 Mangaroa Peatland Focus Group_Gavin Kirton	S91.003	Policy 47: Managing effects on indigenous ecosystems and habitats with	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant indigenous biodiversity values - consideration		matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S96 Sarah (Dr) Kerkin	S96.021	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	GWRC be required to clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. GWRC be required to collaborate closely with the community in developing rules to ensure workability.
S97 Mangaroa Peatland Focus Group_Nicola Rothwell	S97.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S100 Meridian	S100.021	Policy 47: Managing	Oppose in part	The focus of the RPS should be on 'natural' wetlands.	Amend Policy 47 by referring to 'natural wetlands' as follows:

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Energy Limited		effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration			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 affect indigenous ecosystems and habitats with significant indigenous biodiversity values, and in determining whether the proposed activity is inappropriate particular regard shall be given to: (a) ... (b) ... (c) managing natural wetlands for the purpose of aquatic ecosystem health, recognising the wider benefits, such as for indigenous biodiversity, water quality and holding water in the landscape; (d) ...
S101 Mangaroa Peatland Focus Group_Madeline Keown	S101.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.058	Policy 47: Managing effects on indigenous ecosystems and habitats with significant	Support in part	Generally supports the policies that need to be considered in the 'Indigenous ecosystems' chapter. However, under Policy 47, there is a need to expressly state that Māori values be included as part of any assessment of biodiversity values.	Insert a new clause in Policy 47, as follows: (j) identified historical, cultural and spiritual relationships and values tangata whenua have with indigenous biodiversity.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		indigenous biodiversity values - consideration			
S103 Mangaroa Peatland Focus Group_ Stacey Jack-Kino	S103.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S104 Hamish McDonald_Mangaroa Peatland Focus Group	S104.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S105 Sharlene McDonald_Mangaroa Peatland	S105.003	Policy 47: Managing effects on indigenous ecosystem	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Focus Group		s and habitats with significant indigenous biodiversity values - consideration		'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S107 Lisa Keown Mangaroa Peatland Focus Group	S107.004	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S108 Mangaroa Peatland Focus Group_Kerry Ryan	S108.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S109 Mangaroa Peatland Focus Group_Christine withey	S109.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S110 Mangaroa Peatland Focus Group_John Ryan	S110.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S111 Mangaroa Peatland Focus Group_Shila Ryan	S111.003	Policy 47: Managing effects on indigenous ecosystems and habitats with	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant indigenous biodiversity values - consideration		matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S112 Mangaroa Peatland Focus Group_Russell Flood-Smith	S112.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S115 Hutt City Council	S115.071	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose	While indigenous biodiversity is a key issue, we expect the government 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. 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.	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S121 Mangaroa Peatland Focus	S121.003	Policy 47: Managing effects on indigenous	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Group_Shane Stratford		ecosystems and habitats with significant indigenous biodiversity values - consideration		any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	issuing a consultation document.
S122 Mangaroa Peatland Focus Group_Jaime Walsh	S122.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S123 Peter Thompson	S123.018	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support	The addition points added in this policy are important ones that will aid resilience to climate	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S127 Neo Leaf Global	S127.007	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	<p>The entire concept of buffering has not been adequately defined and there has been no consultation with communities, including infrastructure service providers, relevant landowners and occupiers that would be impacted.</p> <p>There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained.</p>	Remove clause (b).
S129 Waka Kotahi NZ Transport Agency	S129.023	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	Policy should be aligned with the NPS-IB exposure draft.	Align Policy 47 with the NPS-IB exposure draft and clarify how to manage effects.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.095	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support	Ātiawa supports the amendments made to Policy 47 to provide for indigenous ecosystems and habitats. We seek reference to mana whenua values associated with indigenous ecosystems and habitats are provided for in Policy 47 to ensure our values are considered as part of any assessment.	Amend to: (j) recognising and providing for indigenous ecosystems and habitats that contain mana whenua values (including spiritual, historical and cultural characteristics)

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S133 Muaūpoko Tribal Authority	S133.021	Policy 47: Managing effects on indigenous ecosystem s and habitats with significant indigenous biodiversity values - considerati on	Support	Supports acknowledgement of the limits to offsetting.	Retain as notified. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te-Whanganui-a-Tara is recognised.
S138 Mangaroa Peatland Focus Group_Jo dy Sinclair & Josh Lowny	S138.003	Policy 47: Managing effects on indigenous ecosystem s and habitats with significant indigenous biodiversity values - considerati on	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S140 Wellington City Council (WCC)	S140.072	Policy 47: Managing effects on indigenous ecosystem s and habitats with significant indigenous biodiversity values -	Support	Support as proposed.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S142 Combined Cycle Submitters (CCS)	S142.005	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	Supports amendments in Policy 57 which further and more explicitly embed decarbonisation and mode shift considerations; however request retention of the term 'attractive' given further definition provided by the Environment Court.	Amend clause (e) as follows: (e) provides for well-connected, safe, attractive and accessible multi modal transport networks....
S144 Sustainable Wairarapa Inc	S144.023	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support	The addition points added in this policy are important ones that will aid resilience to climate change and minimise impacts on biodiversity	Retain as notified.
S146 Mangaroa Peatland Focus Group Alan Rothwell	S146.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values -	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration		To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S147 Wellington Fish and Game Council	S147.027	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policies 9 and 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening of protections for non-indigenous dominant systems and the subsequent adverse environmental effects on these (and the whole system).	Amend title and text: Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity and other values - consideration 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 affect indigenous ecosystems and habitats with significant indigenous biodiversity or other values , and in determining whether the proposed activity is inappropriate particular regard shall be given to:
S147 Wellington Fish and Game Council	S147.028	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policies 9 and 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening of protections for non-indigenous dominant systems and the subsequent adverse environmental effects on these (and the whole system).	new subclause: (j) protecting the habitats of indigenous freshwater species, trout, and salmon.
S148 Wellington Internation	S148.042	Policy 47: Managing effects on indigenous	Oppose in part	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.	Delete subparagraph (i) including the reference to Policy 24 and the limits on offsetting and compensation.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
al Airport Ltd (WIAL)		ecosystems and habitats with significant indigenous biodiversity values - consideration			
S149 Mangaroa Peatland Focus Group_Matthew Rothwell	S149.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S150 Mangaroa Peatland Focus Group_Anna Brodie & Mark Leckie	S150.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S156 Mangaroa Peatland Focus Group_Tim Rothwell	S156.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S159 Mangaroa Peatland Focus Group_Antony & Jemma Ragg	S159.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn, what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.
S160 Mangaroa Peatland Focus Group_Jen & Chris Priest	S160.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous	Oppose in part	The entire concept of buffering has not been adequately defined and there has been no consultation with communities that would have been impacted. There has been no definition as to the dimensions of any buffer zone, no definition as to what constitutes 'adequate' nor has there been any clear direction as to what activities within the buffer would be constrained. To consult meaningfully, we need to understand matters like the dimensions of any buffer zone, the scientific basis on which those buffers being drawn,	Clearly define the concept of buffering, including all relevant factors and rules that would apply to the buffer zone. Undertake extensive community consultation prior to issuing a consultation document.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		biodiversity values - consideration		what constitutes 'adequate' and the restrictions that might be imposed on activities within the buffer. To reiterate, before a buffer zone could be imposed, there would need to be effective consultation with the landowner where the SNA is situated as well as consultation for landowners within the buffer zone.	
S161 Grant O'Brien	S161.003	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose in part	As per above, until 'indigenous ecosystems' and 'habitats with significant indigenous biodiversity values' are mapped and understood and affected landowners advised, we can not support the inclusion of 'adequate buffering' as it is unclear who will be affected by this and what the implication of 'buffering' is. The term adequate is also qualitative and meaningless - actual distances need to be defined using appropriate data. Landowners would need compensation for losses of investment and livelihood on their land.	Remove the phrase 'adequate buffering', until such time as areas requiring buffering are mapped and landowners affected by buffering are engaged with.
S162 Winstone Aggregates	S162.015	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	Generally supports the changes to clause (g) of this policy. Request removal of (i) for the reasons described in Policy 24 summary. Queries whether there are changes to how this policy operates due to insertion of proposed new definitions.	Reject changes to clause (i) [Note: Submission reference prior submission point S162.009]
S163 Wairarapa Federated Farmers	S163.073	Policy 47: Managing effects on indigenous ecosystems and habitats with	Oppose	The amendments to Policy 47 are principally to add clause i) referencing Policy 24 (offsets). Refer to submission on Policy 24 for reasons as to why this policy should be deleted.	That the amendments to Policy 47 be deleted. Delete the FW icon.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant indigenous biodiversity values - consideration			
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.074	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support in part	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. A limit is something that has to be given effect to not had regard to. Require adherence to a full set of mandatory offsetting and compensation principles	Include (i) 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 (as submitted above).
S168 Rangitāne O Wairarapa Inc	S168.077	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Support	Rangitāne o Wairarapa support acknowledgement of the limits to offsetting, noting Rangitāne o Wairarapa's outstanding concerns with Policy 24.	Retain as notified
S167 Taranaki Whānui	S167.0113	Policy 47: Managing effects on indigenous ecosystems and habitats with	Support in part	Support with further promotion of mana whenua protections in consideration	Insert a new clause: (x) protecting the relationship between mana whenua / tangata whenua and their culture, land, water, wāhi tapu and other taonga

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		significant indigenous biodiversity values - consideration			
S16 Kāpiti Coast District Council	S16.063	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose	As this policy is not required by the RMA or a higher-level statutory planning document Council requests the methods and implementation of those methods should be the responsibility of GWRC only.	Delete Policy IE.2 or amend so it is only applicable to the regional council.
S30 Porirua City Council	S30.069	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose	<p>Policy requires some specificity as to what the matter is being addressed through the policy, otherwise would apply as a consideration for any type of consent. Further, this policy would better be articulated as a transitional policy that falls away once Policy EI.1 is given effect to.</p> <p>This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans, as well as the NPS-IB.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives and/or reword policy as follows:</p> <p>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development that may impact on indigenous biodiversity, particular regard shall be given to enabling mana whenua / tangata whenua to exercise their role as kaitiaki, including, but not restricted to:</p> <p>(a) providing for mana whenua / tangata whenua values associated with indigenous biodiversity, including giving local effect to Te Rito o te Harakeke,</p> <p>(b) incorporating the use of mātauranga Māori in the management and monitoring of indigenous biodiversity; and</p> <p>(c) supporting mana whenua / tangata whenua to access and exercise sustainable customary use of indigenous biodiversity, including for mahinga kai</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					and taonga, in accordance with tikanga. Amend policy to include this statement, deeming provision, or advice note: This policy shall cease to have effect once Policy EI.1 is in place in an operative district or regional plan.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.084	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose in part	Council supports the intent of the policy, but it cannot be implemented until the NPS-IB, given the uncertainty of provisions once finally gazetted.	Delete indigenous biodiversity provisions until the NPS-IB is gazetted.
S115 Hutt City Council	S115.072	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose	While indigenous biodiversity is a key issue, we expect the government 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. 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.	Delete all new provisions and amendments to existing provisions and retain existing Operative RPS provisions.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.096	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health -	Support	Ātiawa supports Policy IE.2, the policy provides for mana whenua, including our values, mātauranga Māori, and our ability to exercise our cultural practices and ways of being in the natural world.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S133 Muaūpoko Tribal Authority	S133.023	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support in part	Supports the requirement to partner with mana whenua/tangata whenua, but request that Muaūpoko are also recognised.	Recognise Muaūpoko as also having connection to indigenous biodiversity in Te-Whanganui-a-Tara. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te Whanganui-a-Tara is recognised.
S140 Wellington City Council (WCC)	S140.073	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support	Support as proposed.	Retain as notified.
S147 Wellington Fish and Game Council	S147.036	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support in part	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported. At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords Regional Councils responsibility for "maintaining" rather than "managing" indigenous biodiversity.	Amend title: Policy IE.2: Giving effect to mana whenua/tangata whenua role and values when managing maintaining
S147 Wellington Fish and	S147.037	Policy IE.2: Maintaining, enhancing,	Support in part	Support the intention of this objective to ensure that mana whenua/tangata whenua values are properly recognised and provided for and their role as kaitiaki is supported.	Amend subclause (a) providing for mana whenua / tangata whenua values associated with indigenous biodiversity, including giving local effect to Te Rito o te Harakeke, within a wider

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Game Council		and restoring indigenous ecosystem health - consideration		At the same time, in order to give full effect to the NPS-FM, those values must be considered alongside other recognised values and achieved in partnership with statutory managers of freshwater species and their habitats. The suggested amendment also aligns the language of this objective with the language of s 30(ga) RMA, which accords Regional Councils responsibility for "maintaining" rather than "managing" indigenous biodiversity.	framework of equal weighting given to community values around indigenous and valued introduced biodiversity
S163 Wairarapa Federated Farmers	S163.074	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Oppose	Consider it is hugely inefficient to require that particular regard be given to exercise of mana whenua / tangata whenua role as kaitiaki for individual resource consent applications.	That Policy IE.2 be deleted. Delete the FW icon
S168 Rangitāne O Wairarapa Inc	S168.079	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health - consideration	Support	Rangitāne o Wairarapa support giving effect to mana whenua/tangata whenua roles in managing indigenous biodiversity.	Retain as notified
S167 Taranaki Whānui	S167.0114	Policy IE.2: Maintaining, enhancing, and restoring indigenous ecosystem health -	Support in part	Support with further direction for partnership in decision making	Insert a new clause: (x) partnering with mana whenua / tangata whenua in resource management and decision making

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S16 Kāpiti Coast District Council	S16.072	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>We support the addition of subdivision and use to the policy, these would be welcome additions to regional plans to assist city and district councils in the avoidance of the effects arising from significant natural hazards.</p> <p>Council requests the policy be amended to reflect the responsibilities of regional and city and district councils under the RMA with respect to natural hazards.</p> <p>We also request the verbs used in the policy are consistent. As a consideration policy the wording of the rest of the policy should require consideration to the listed matters.</p>	<p>Amend Policy 51 as follows: Policy 51: Minimising Avoiding or mitigating 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 minimised, and/or in determining whether an activity is inappropriate particular regard consideration shall be given to: (a) ...</p>
S25 Carterton District Council	S25.040	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	CDC supports the amendments to this policy, noting that the draft Wairarapa Combined District Plan has been developed in a way that will give effect to this policy.	Retain the policy.
S30 Porirua City Council	S30.070	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Oppose	<p>This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans.</p> <p>Further, this policy would better be articulated as a transitional policy that falls away once Policy 29 is given effect to.</p>	<p>Amend policy to only apply to resource consents. Amend policy to include this statement, deeming provision, or advice note: This policy shall cease to have effect once Policy 29 is in place in an operative district or regional plan.</p>
S32 Director-General of	S32.028	Policy 51: Minimising the risks	Support in part	Climate change and sea level rise can increase the frequency or magnitude of a hazard event, so this is a relevant matter to consider.	Retain as notified, except to retain the operative version of subclause (b): the potential for climate change

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Conservation		and consequences of natural hazards - consideration			and sea level rise to increase in the frequency or magnitude of a hazard event"
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.050	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>Council supports the provisions that recognise and seek to address issues relating to natural hazards.</p> <p>It is noted that under sections 6, 30 and 31 of the RMA it recognises the need to manage significant risk and avoid or mitigate effects. In this regard, Council wonder whether the policy is strong enough by using the term minimised. It is also unclear what 'minimises' means and what level of minimisation would be acceptable.</p>	<p>Retain provision a notified, except amend to read:</p> <p>"Policy 51: Minimising Addressing 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 minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to: ... Policy 51 aims to address minimise the risk and consequences..."</p>
S49 Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand	S49.005	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	There is no need for regional or district plans to regulate the resilience of telecommunications infrastructure where it is located in natural hazard areas. In some instances, avoiding a natural hazard area is not possible for technical and operational reasons.	Remove the ability for regional and district plans to regulate the resilience of infrastructure to identified natural hazards.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Trading Limited					
S79 South Wairarapa District Council	S79.045	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>Generally SWDC support the improvements to the policy. There is concern regarding (f) in that the inclusion of the word 'may' adds unnecessary uncertainty. This should be deleted.</p> <p>It is critical that an additional method supporting this policy is included to address how residual risk is consistently assessed. This is more important where mitigation structures are proposed. Practical implementation of assessment of residual risk has been problematic without either hazard specific or general guidance.</p>	Amend Policy 51 to remove the inclusion of 'may' in (f). Include a method that develops suitable guidance and methodology for persons assessing residual risk from hazard, particularly those affected by mitigation structures.
S113 Wellington Water	S113.042	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Clause (f) 'Minimise' is only appropriate if defined in accordance with the pNRP definition	Clause (f): Retain "minimising" only if defined in accordance with the pNRP.
S113 Wellington Water	S113.043	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Add a new clause, as clause (g) doesn't recognise that some regionally significant infrastructure must locate in high hazard locations	Insert new clause: (k) recognising that it may not always be practicable for regionally significant infrastructure to avoid high to extreme hazard areas and providing appropriate management regimes
S115 Hutt City Council	S115.073	Policy 51: Minimising the risks and consequences of natural hazards -	Support in part	Support the intent of this policy. However, we expect district plans will adequately provide for the situations where natural hazards should be considered and this does not need to be revisited in individual resource consents where the district plan has already assessed the level of risk.	Retain amended Policy 51 but modified so that it does not apply to resource consents once the relevant district or regional plan has given effect to Policy 51.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S128 Horticulture New Zealand	S128.046	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	Terms and language should be consistent throughout the RPS Change 1 document.	Amend as follows:g) avoiding inappropriate subdivision, inappropriate use or development, and hazard sensitive activities where the hazards and risks are assessed as high to extreme
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.097	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>Ātiawa supports in part the proposed amendments to Policy 51. Ātiawa supports the intent of the policy to reduce the impact of natural hazards on the natural and physical environment, as well as anthropological values.</p> <p>Ātiawa is concerned that the policy does not adequately provide for mana whenua values. As it is drafted the policy is silent on any values for mana whenua. Ātiawa seeks a new subclause be added to provide for this.</p> <p>Additionally, Ātiawa seeks to work together with Regional Council, to ensure that decision-making occurs under the principle of partnership to guarantee that mana whenua values are provided for and protected in regards to natural hazards. Ātiawa seeks an additional policy to provide this relief.</p>	<p>Include new subclauses:(f) mana whenua values, including mana whenua relationship with their traditions, ancestral lands, water, sites, wāhi tapu and other taonga.</p> <p>Insert new policy:Policy xx: Partner with mana whenua in decision-making and management processes for natural hazards, to recognise and provide for their relationship with water, land, sites, wāhi tapu and other taonga that is susceptible to such events.</p>
S132 Toka Tu Ake EQC	S132.008	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	We support minimizing the risks from natural hazards by land use planning and regional policies.	No Change

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S133 Muaūpoko Tribal Authority	S133.060	Policy 51: Minimising the risks and consequen ces of natural hazards - considerati on	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
S134 Powerco Limited	S134.017	Policy 51: Minimising the risks and consequen ces of natural hazards - considerati on	Oppose	<p>As with Policy 29, the direction in clause (g) to avoid subdivision, use or development in areas where hazards and risks are assessed as high to extreme is opposed. It will not be possible or necessary to entirely avoid all subdivision, use or development such areas, particularly where maintenance or minor upgrade type work is required to existing activities in these areas, or where regionally significant infrastructure is required to traverse areas of high or extreme risk, such as stream and river corridors, to deliver services to communities on the other side.</p> <p>This is recognised in the PNRP and district plans where provision is made for certain activities to occur in areas where natural hazards and risks are assessed as high to extreme, such as stream corridors and areas in the current coastal hazard inundation and erosion overlays.</p>	<p>Amend Policy 51 to recognise that it will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme, and to ensure appropriate provision is made for regionally significant infrastructure to be maintained and to traverse such locations. This could be achieved by making the following changes or to the same effect:</p> <p>"When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to:</p> <p>...</p> <p>(g) avoiding new subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme, and appropriately managing risk to new and existing regionally significant infrastructure and to existing subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.;</p> <p>..."</p>
S139 Ian Gunn	S139.005	Policy 51: Minimising the risks and	Support	How are the hazards defined as low to moderate eg for flooding, is there a specific standard for these terms	Define low to moderate hazards.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consequences of natural hazards - consideration			
S139 Ian Gunn	S139.006	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	With the focus on nature based solutions it is highly likely that the creation of wetlands/bunds/low dams will be used to minimise the impact of flooding ie slowing down runoff.	Recognise that nature based solutions are likely to be utilised.
S139 Ian Gunn	S139.007	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support	Is the 1%AEP is calculated with the climate change factor added?	Clarify that 1% AEP calculations must factor in climate change.
S140 Wellington City Council (WCC)	S140.074	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	As written, the policy would stop use and development that could actually reduce hazards and risk, for example relocation, protection structures, lot adjustments. It's not just "inappropriate" development affected by this policy anymore. Also, hazard sensitive activities are part of "use and development".	Amend with this text, or similar: (g) avoiding subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme; ensuring that subdivision, use or development in areas with high to extreme natural hazard risk can avoid, or mitigate to a moderate or low level, the natural hazard risk;
S144 Sustainable Wairarapa Inc	S144.056	Policy 51: Minimising the risks and consequences of	Support in part	Important that knowledge of natural hazards is widespread. Clause (h): The submitter raised a question regarding how are the hazards defined as low to moderate eg for flooding, is their a specific standard for these terms.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		natural hazards - consideration		<p>Clause (i): The submitter commented on "with the focus on nature based solutions it is highly likely that the creation of wetlands/bunds/low dams will be used to minimise the impact of flooding ie slowing down runoff."</p> <p>Clause (j): The submitter raised a question of whether the calculation has the climate change factor included.</p>	
S148 Wellington International Airport Ltd (WIAL)	S148.048	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Oppose in part	As above, WIAL submits that for certain activities, the risk to natural hazards is inherently different to those activities that do not have the same operational and functional need to locate in areas deemed to be high hazard locations. It would be inappropriate for this policy to constrain the development of the Airport for example on the basis of its proximity to the coast.	Delete this policy or amend to acknowledge that regionally significant infrastructure is not inappropriate development in certain high hazard locations.
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.045	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Oppose	<p>As with Policy 29, the direction in clause (g) to avoid subdivision, use or development in areas where hazards and risks are assessed as high to extreme is opposed. It will not be possible or necessary to entirely avoid all subdivision, use or development such areas, particularly where maintenance or minor upgrade type work is required to existing activities in these areas or where there is an operational or functional need for an activity to locate in or traverse an area at risk from natural hazards. Further, the acceptability of risk for some activities will vary depending on the hazard involved e.g. flooding, coastal erosion, rockfall, earthquake etc.</p> <p>This is recognised in the PNRP and district plans where provision is made for certain activities to occur in areas where natural hazards and risks are assessed as high to extreme, such as stream corridors and areas in the current coastal hazard inundation and erosion overlays.</p>	<p>Amend Policy 51 to recognise that it will not be possible or necessary to entirely avoid all subdivision, use or development in areas where hazards and risks are assessed as high to extreme, and to ensure appropriate provision is made for regionally significant infrastructure to be maintained and to traverse such locations. This could be achieved by making the following changes or to the same effect:</p> <p>(g) avoiding inappropriate subdivision, use, or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme;</p>
S163 Wairarapa Federated Farmers	S163.075	Policy 51: Minimising the risks and consequences of	Oppose	To the extent Council concern relates principally to future-proofing urban developments (high density, high capital and often located alongside the coast or major rivers), then that should be specified in the policy. The default position should not be to avoid all subdivision use or development in areas subject to natural hazards	That the amendments to Policy 51 be deleted. To the extent amendments to Policy 51 are made, delete the FW icon.

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		natural hazards - consideration		as certain types of subdivision can still be appropriate. Refer to submission for more detail.	
S165 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 in part	The direction to "minimise" the risk and consequences of natural hazards on people, communities, their property and infrastructure" is inconsistent with NZCPS Policy 25. More broadly, it is an inappropriate management approach, as a risk may be minimised but still be very significant.	Amend the heading and chapeau to Policy 51 as follows: Policy 51: Minimising Avoiding 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 minimised avoided , and/or in determining whether an activity is inappropriate particular regard shall be given to:"
S166 Masterton District Council	S166.036	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	The Wairarapa Combined District Plan will give effect to this Policy. See also response against Policy 29. [Note. This submission point reference S166.031, raising queries about How are the objective and methods reconciled with the national direction for urban growth and intensification? What policies, rules and evidence will be necessary to avoid legal challenge?]	Retain as notified. However: Further clarity sought on impacts to consenting pathways for stop banks.
S170 Te Rūnanga o Toa Rangatira	S170.059	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	It is important to support this policy as a consideration and appreciate the detail that it goes into covering all the potential issues we experience from natural hazards. It is noticeable there are water quality and overflow issues with our three-water network and flooding exacerbates these issues, and further making them more hazardous catalysed by the floods. There are not any connections created in the Policy 51. Yet this is an important consideration for Tangata Whenua. Clause (i) includes moderate risks; it is not convincing, if the risk is moderate, the Policy should not automatically allow that subdivision, use and development. Only if the risk is low then this could	Recognise in the provision water quality and overflow issues with our three-water network and flooding exacerbates hazard issues. Clause (i) should only allow subdivision, use and development with mitigation when the hazard risk is low. Clarify clause (ia) and the interaction with district plans.

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				<p>justify a mitigation if the hazard occurred.</p> <p>Clause (ia) is not clear; District Plans are responsible to make rules, making sure that the developments do not block the overland flood paths; do we consider the RPS should mention this, too? What policy gap this is looking into addressing or is it doubling up?</p> <p>It is unclear whether the clause (j) was too conservative, taking into account 1 in a 100-year flood as we are seeing them more often in the face of worsening impacts of Climate Change and global warming.</p>	
S167 Taranaki Whānui	S167.0115	Policy 51: Minimising the risks and consequences of natural hazards - consideration	Support in part	<p>Given historical land confiscations and development barriers - there needs to be a specific protection in place to prevent further disadvantage to mana whenua.</p> <p>Taranaki Whānui supports the amendments to Policy 51 but want to see specific protections for Māori owned land.</p>	Retain as notified.
S16 Kāpiti Coast District Council	S16.039	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	<p>Regarding clause (b), it is unclear what the criteria would be for determining whether options being considered are a more appropriate or suitably innovative solution. How will the suitability of potential innovative solutions be determined? Who will determine whether an option is more appropriate or suitably innovative under this clause? Council requests amendments to eliminate this uncertainty.</p> <p>We request the use of verbs in the policy is consistent. As a consideration policy it is not appropriate for decision makers to have particular regard to the policy. These terms have different meanings in RMA decision making. We request this inconsistency is addressed.</p>	<p>Amend Policy 52 as follows:</p> <p>Policy 52: Minimising adverse effects of hazard mitigation measures - consideration</p> <p>(a) ...</p> <p>(b) whether non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options would provide a more appropriate or suitably innovative solution the same or a greater degree of hazard mitigation;</p> <p>(c) ...</p> <p>Explanation</p> <p>Policy 52 recognises that the effects of hard protection structures can have adverse effects on the environment, increase the risks from natural hazards over time and transfer the risks to nearby</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					areas. It provides direction to consider lower impact methods of hazard mitigation such as non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options, that may be as effective at hazard mitigation as structural protection works or hard engineering methods more appropriate providing they can suitably mitigate the hazard.
S30 Porirua City Council	S30.071	Policy 52: Minimising adverse effects of hazard mitigation measures - considerati on	Oppose	<p>The policy lacks the necessary precision to enable its meaningful implementation and does not align with objectives. Issues of concerns include:</p> <ul style="list-style-type: none"> • The term/concept 'room for the river' needs better policy direction, or otherwise needs to be defined, explained, or deleted. It is currently unclear what this term means or how it should be implemented. • It is unclear why the following undefined terms were used rather than the defined term 'nature-based solution' (noting that Council opposes this definition): non-structural, soft engineering, green infrastructure. • The concept/term 'room for the river' could provide guidance to councils to enable them to make stronger arguments for taking appropriate land around rivers as an esplanade reserve under s.230 RMA. • The term 'sites and areas of significance to Māori' is more consistent with the National Planning Standards. Further, it is unclear what particular regard is to be given to, their protection? • There is no such thing as a 'city plan' under the RMA. • Amendment to (g) suggested so that it links better to the chapeau of the policy. • This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans. • Further, this policy would better be articulated as a transitional policy that falls away once relevant policies are given effect to. 	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives.</p> <p>Amend policy to only apply to resource consents.</p> <p>Amend policy to include this statement, deeming provision, or advice note:</p> <p>This policy shall cease to have effect once Policy [XXX] is in place in an operative district or regional plan.</p>
S32 Director-	S32.029	Policy 52: Minimising	Support in part	While the proposed changes are generally appropriate for most locations, they fail to give effect to NZCPS	Adda new subclause as follows or words to like effect: "avoidinghazard mitigation measures within

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
General of Conservation		adverse effects of hazard mitigation measures - consideration		Policy 25, especially clauses a and b of that Policy which require avoiding increasing risk.	the coastal environment that would increase the risk of social, environmental and economic harm or other adverse effects from coastal hazards"
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.051	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	<p>Council queries the use of nature-based solutions vs. green infrastructure throughout RPSPC1, as noted on other provisions, and asks that there be consistency in terms.</p> <p>It is recognised that the green infrastructure is an appropriate method, but there will also be long-term maintenance and associated costs which should be recognised. It is also unclear of what the land requirements associated with "room for the river" means, as well an acceptable level if minimisation means in this context.</p>	<p>Provide clarity, recognise that there will be costs associated with non-hard engineered measures that territorial authorities do not have the resources to meet, and amend the policy to read:</p> <p>"Policy 52: Addressing Minimising adverse effects of hazard mitigation measures - consideration variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given....</p> <p>.... Mātauranga Māori options provide a more appropriate or suitably innovative solution; ..."</p> <p>Amend for consistency between nature-based solutions and green infrastructure.</p>
S49 Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand Trading Limited	S49.006	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Clause(c) specifically allows structural protection or hard engineering methods to protect regionally significant infrastructure from hazards. Whilst this is not necessarily a preferred method of the telecommunications companies, provision to allow such methods to be employed if necessary is supported.	Retain as notified
S79 South Wairarapa	S79.046	Policy 52: Minimising adverse	Support in part	Generally support the amendments to the policy. However, the amendments at the foot of the policy which are now to 'minimise' the risk from natural	Amend the changes to the footer of Policy 52 to remove the changes to include the word 'minimise' and retain the

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
District Council		effects of hazard mitigation measures - consideration		hazards creates greater uncertainty. While SWDC understands the reasoning behind it, when undertaking protection works it is now unclear as to what standard of protection GWRC expects. For example, for flood protection work, does minimise mean for a 1%AEP event (with climate change) or does it mean a 0.1%AEP event (with climate change).	existing words 'reduce'
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.095	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Considers that Policy 52 should be a "Regulatory" option, rather than a "Consideration" option, to give this greater weight.	Amend Policy 52 to a regulatory policy.
S115 Hutt City Council	S115.074	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Support the intent of this policy, but: <ul style="list-style-type: none"> • A suitably specific definition is needed for "room for the river" • The reference to innovation is redundant. Innovation is not a goal in and of itself, and whether a solution is innovative is independent of whether it is effective. 	Retain amended Policy 52 but: <ul style="list-style-type: none"> • provide a definition for "room for the river", and • amend clause (b) as follows: "(b) whether non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options provide a more appropriate or suitably innovative solution;"
S124 KiwiRail Holdings Limited	S124.008	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	KiwiRail supports Policy 52 which recognises that, in some instances, hard engineering methods are necessary to protect regionally significant infrastructure from unacceptable risks from natural hazards. There are sections of the rail corridor which run parallel to the coastline and are vulnerable to storm surge and high tides. KiwiRail support policy direction which acknowledges risk of hazards, including coastal hazards, to infrastructure and the need to construct hard structures as a protective measure.	Retain as notified
S128 Horticulture New Zealand	S128.047	Policy 52: Minimising adverse effects of hazard mitigation measures -	Support in part	Highly productive land is a natural resource that will need to be carefully managed with a changing climate so this land can continue to meet the reasonably foreseeable needs of future generations. With a changing climate we can expect the following impacts. Natural hazards pose a risk to food production and events can disrupt food supply - there may be situation	Amend as follows: (c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, highly productive land with food security values , regionally significant infrastructure or property from unacceptable risk

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration		where structural protection works or hard engineering methods are warranted.	and the works form part of a long-term hazard management strategy that represents the best practicable option for the future;
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.098	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	<p>Ātiawa supports in part the proposed amendments to Policy 52. Ātiawa supports the overall intent of the policy. Ātiawa seeks further amendments to provide for mana whenua values.</p> <p>Ātiawa supports reference to mātauranga Māori options. Ātiawa is encouraged that mātauranga Māori is being recognised by Regional Council given it offers solutions to many resource management issues we face today.</p> <p>Ātiawa seeks that mana whenua lead and partner with Regional Council to develop such solutions. This includes tikanga to protect mātauranga Māori, including how it is used, access, stored and shared.</p> <p>Ātiawa supports the use soft engineering, green infrastructure solutions over hard structural and engineering solutions.</p>	<p>Ātiawa inclusion of the following subclauses: (cd) adverse effects on Māori freshwater values, including mahinga kai(ce) adverse effects on mana whenua relationship with their culture, land, water, sites, wāhi tapu and other taonga</p>
S132 Toka Tu Ake EQC	S132.009	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	When natural hazard mitigation measures are put into place, it is important that these measures to not increase the natural hazard risk in other areas or in the future.	No Change
S133 Muaūpoko Tribal Authority	S133.061	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.

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S137 Greater Wellington Regional Council (GWRC)	S137.027	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	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, or regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard management strategy agreed to by relevant authorities , that represents the best practicable option for the future;
S139 Ian Gunn	S139.008	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Term regionally significant doesn't appear to include stopbanks/flood retention structures. See p223	(c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, regionally significant infrastructure (including stopbanks/flood retention structures) or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future;
S139 Ian Gunn	S139.011	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Strongly support.	Retain clause (b) as notified.
S140 Wellington City Council (WCC)	S140.075	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Support the intent of this policy, but more research is needed before 'room for the river' policy can effectively be implemented in the Wellington region and should be removed until we have more information.	Amended Policy 52: (b) whether non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options provide a more appropriate or suitably innovative solution;

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S144 Sustainable Wairarapa Inc	S144.057	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Important that knowledge of natural hazards is widespread. Nature-based solutions can provide ecosystem services. Structural protection works or hard engineering methods can damage the environment, be vulnerable to increased risks with climate change and have a shorter life. Nature-based solutions for flood control would help to improve water resilience by storing water for longer in the landscape.	To include stopbanks/flood retention structures in clause (c): (c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, regionally significant infrastructure, stopbanks/flood retention structures or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future;
S147 Wellington Fish and Game Council	S147.070	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Strongly support the proposed changes to Policy 52 and the incorporation of the concept of Te Mana o Te Wai in paragraph (e). However, hazard mitigation measures such as stop banks or weirs can interfere significantly with the habitat of indigenous freshwater species, trout, and salmon, and have significant impacts on the extent and values of both rivers and wetlands. This is not fully captured in paragraph (e) as drafted. The suggested amendments address this issue and is intended to give better effect to the NPS-FM Policies 6, 7, 9 and 10.	amend subclause: (e) adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity and habitats of indigenous freshwater species, trout, and salmon;
S147 Wellington Fish and Game Council	S147.071	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Strongly support the proposed changes to Policy 52 and the incorporation of the concept of Te Mana o Te Wai in paragraph (e). However, hazard mitigation measures such as stop banks or weirs can interfere significantly with the habitat of indigenous freshwater species, trout, and salmon, and have significant impacts on the extent and values of both rivers and wetlands. This is not fully captured in paragraph (e) as drafted. The suggested amendments address this issue and is intended to give better effect to the NPS-FM Policies 6, 7, 9 and 10.	new subclause: (ea) ensuring that there is no further loss of natural inland wetlands or river extent and their values are protected
S148 Wellington	S148.049	Policy 52: Minimising	Support in part	WIAL generally supports Policy 52(c) in that it recognises that structural protection works and/or hard	Delete this policy and explanation, or

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International Airport Ltd (WIAL)		adverse effects of hazard mitigation measures - consideration		<p>engineering methods may be necessary to protect regionally significant infrastructure from hazard risk. This is relevant to the seawall which currently exists to protect existing infrastructure from the effects of coastal erosion and storm surges. It is noted however that the first preference in the RPS is to avoid such structures. With respect to the sea wall avoidance cannot practicably be the first preference in such a location. It is also not clear how such requirements as the "long term viability of maintaining the structural protection works" will be measured in the context of this policy.</p> <p>Does it mean that ongoing maintenance has to be avoided? Or does it require that the structure is able to withstand changes as a result of climate change and therefore should be maximised in terms of its engineering and construction.</p> <p>Reference is made to adverse effects on Te Mana o te Wai which is a concept of the NPS FW and not be applicable to the CMA and Te Rito o te Harakeke which as defined is overly broad.</p>	make it clear that in some situations hard engineering methods can be preferred in order to protect existing regionally significant infrastructure assets and limit reference to Te Mana o te Wai and Te Rito o te Harakeke
S163 Wairarapa Federated Farmers	S163.076	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Oppose	Defer to full RPS review in 2024	That the amendments to Policy 52 be deleted Delete the FW icon.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.076	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	<p>Support the recognition of green infrastructure and "room for the river" options when considering resource consents, a notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures.</p> <p>However, Forest & Bird seeks:</p> <p>a. Prioritisation of green infrastructure, room for river over structural protection works or hard engineering methods;</p> <p>b. The inclusion of "nature-based solutions" as a solution in clause (b) - as this is supported by Te Mana</p>	<p>Amend as follows:</p> <p>Policy 52: Minimising Avoiding 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;</p>

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				<p>o te Taiao Aotearoa New Zealand Biodiversity Strategy 2020</p> <p>Prioritisation of these options ensures consistency with:</p> <p>a. Section 6(a) of the RMA ("thepreservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins and the protection of them from inappropriate subdivision, use, and development");</p> <p>b. NPSFM Policy 7 and clause 2.24;</p> <p>c. NZCPS Policies 25, 26, and 27.</p> <p>Forest & Bird considers "minimise" is a low bar unsupported by higher order documents. The direction should be to "avoid the risks from natural hazards" or otherwise reinstate "reduce and do not increase".</p>	<p>(b)whether prioritising non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options or nature-based solutions provide as a more appropriate or suitably innovative solution;</p> <p>...</p> <p>(e) avoiding adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity;</p> <p>...</p> <p>so that they minimise avoid the risks from of natural hazards.</p>
S166 Masterton District Council	S166.037	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	We understand the Policy has been reworded since limited release to reflect that it does not restrict river protection works (structural) from happening, rather it is a consideration to understanding their potential effect on the environment.	Retain as notified. However: Further clarity required regarding the extent to which we need to consider effects.
S170 Te Rūnanga o Toa Rangatira	S170.060	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	<p>Some of the new additions to the policy are encouraging, such as the long-term viability; no increase in risk to adjacent properties, and adverse effects on Te Mana o Te Wai, Te Mana o te Taiao, and that they are considered as part of the consent applications. However, the impacts of hazard mitigation measures to be minimised: these mitigations do alter the site and change the environment in ways that we cannot bring it back.</p> <p>The wording of the first clause (a) 'justifiable', for instance is a subjective word and all flood hazard structures are justifiable at some point in time and that</p>	Strengthen the wording of this provision, e.g. use more directive words in place of 'justifiable' and 'minimise'.

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				<p>this may not be able to be evaluated from an objective perspective. Policy 52 does not elaborate how consent planner will make their assessment. Same with the cumulated effects, how these are assessed are important and may be made on some judgement and value points.</p> <p>The word 'minimise' still leaves policy door open for those who are inclined to think bringing hard engineering structures to the scene is the ultimate answer.</p>	
S167 Taranaki Whānui	S167.0116	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Taranaki Whānui supports the amendments to Policy 52.	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0127	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support in part	Rangitāne o Wairarapa also seek that policy CC.12 is cross-referenced with Policy 52 to reflect the priority of soft engineering over hard engineering solutions in achieving nature-based solutions.	Provide a cross-reference to Policy 52 in policy CC.12, to reflect the priority that soft engineering solutions should be given over hard engineering solutions, in order to provide for and protect nature-based solutions.
S168 Rangitāne O Wairarapa Inc	S168.0144	Policy 52: Minimising adverse effects of hazard mitigation measures - consideration	Support	Rangitāne o Wairarapa support the 100-year planning horizon and risk-based approach proposed for the management of land development in areas at risk from natural hazards. Adopting this approach and using risk-based assessments as considerations in the decision-making process is also supported. We have whānau, hapū that are on the coastline that will be susceptible to hazards and will need management. There will need to be a tikanga and te ao Māori approach for how this happens as there are relationships to be established (Hapū moving into other Hapū whenua) as well as processes for relocating kōiwi (bones) or taonga.	Amend the policy to: Co-decide and engage with Tangata Whenua for these plans and support. Incorporate Mātauranga into the analysis.
S168 Rangitāne	S168.0145	Policy 52: Minimising	Support in part	Rangitāne o Wairarapa support Policy 52 in part, where it seeks to determine whether soft engineering is more	Amend the policy to: Delete the text 'or suitably innovative solution';

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O Wairarapa Inc		adverse effects of hazard mitigation measures - consideration		appropriate and to avoid hard engineering methods unless it is necessary. However, we consider that the words 'suitably innovative' could be subjective and therefore problematic to assess when considering this policy. Rangitāne o Wairarapa support reference in sub-clause (f) to give particular regard to sites of significance to mana/tangata whenua. However, we are concerned that as currently worded, this clause is inappropriately restricted only to those sites 'identified in a planning document'. Many sites will not be documented or identified until the resource consent or notice of requirement stage, and such sites should not be excluded from consideration through those processes. In addition, we request the inclusion of 'taonga species' in sub-clause (e), to be consistent with and give effect to the NPS IB.	Include reference to 'taonga species' in sub-clause (e); To make clause (f) inclusive of other sites of significance which may not be 'identified in a planning document'; Use terminology consistent with the NPS IB, i.e. 'indigenous biodiversity', rather than "local indigenous ecosystem and biodiversity".
S10 Transpower New Zealand Limited	S10.005	Policy 55: Providing for appropriate urban expansion - consideration	Support	Transpower supports the inclusion of (a)(ii)(8) "Protecting Regionally Significant Infrastructure as identified by Policy 8", noting the importance of protecting regionally significant infrastructure from reverse sensitivity effects and that the NPS-UD 3.32(1)(c) and RMA Section 77I(e) identify any "matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure" as a 'qualifying matter'.	Retain Policy 55(a)(ii)(8).
S16 Kāpiti Coast District Council	S16.040	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Whilst Council supports the intent of the policy, noting direction on the consideration of appropriate urban expansion in the RPS is required by the NPS-UD. However, Council has concerns regarding the specific drafting set out below. 1. Consideration versus having particular regard. These verbs have different meanings, and we request the use of these verbs is consistent to present clear direction on the application of the policy to decision makers. Council request the verb chosen for this policy gives effect to the NPS-UD, that being particular regard being given. 2. Clause (a)(ii)1 directs applying the direction of avoidance of inappropriate subdivision, use and development in areas at risk from natural hazards as	Amend Policy 55 as follows: Policy 55: Providing for appropriate urban expansion - consideration When considering an application for a resource consent, or a plan change, variation or review of a district plan for urban development beyond the region's urban areas (as at August 2022) that would provide for significant development capacity, that is not otherwise enabled in the district plan or is not in sequence with planned land release , particular regard shall be given to whether: a) the urban -proposed urban development

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				<p>required by Policy 29. We note RPS change 1 proposes changes to Policy 29 that conflict with this. Council supports the avoidance of inappropriate subdivision, use and development in areas at risk from significant natural hazards, whilst mitigation should be the focus for areas subject to less risk.</p> <p>3. As the policy is to assist in the consideration of potential areas for urban expansion, Council considers it is necessary for the criteria to include the consideration of housing need in the relevant area. This should refer to the latest HBA findings but should also refer to the impacts of the implementation of the MDRS across all urban areas where the impact of this on housing capacity is known. Council notes there is no support for urban expansion in under the NPS-UD where there is no evidence demonstrating the need for additional urban land to meet housing needs.</p> <p>4. Council considers reverse sensitivity effects on existing lawfully established activities needs to be included. This is not limited to the consideration of protecting regionally significant infrastructure.</p> <p>5. Clause (b) is too broad and needs to be amended to be specific to a relevant Future Development Strategy for the area, and in the absence of one it needs to refer to those growth strategies that have been prepared appropriately and are supported by a robust evidence base. It is also important that such growth strategies have been prepared in accordance with the consultation requirements of the Local Government Act. Council notes the WRGF does not meet any of these requirements. Council has addressed concerns with the proposed inclusion of the WRGF in the RPS elsewhere in this submission, but Council also requests amendments to this clause to ensure it is fit for purpose and does not unduly prejudice local decision making and community aspirations for future urban growth.</p> <p>6. Clause (c) needs to be specific on the status of a structure plan and who has prepared it. As currently</p>	<p>contributes to establishing or maintaining the qualities of a well- functioning urban environment, including:</p> <ul style="list-style-type: none"> i the urban development will be well-connected to the existing or planned urban area and infrastructure, particularly if it is located along existing or planned transport corridors; ii the location, design and layout of the proposed development shall apply incorporates the specific management or protection for values or resources identified by this RPS, including: <ul style="list-style-type: none"> 1. Avoiding inappropriate subdivision, use and development in areas at risk from significant natural hazards and the mitigation of other natural hazards as required by Policy 29; 2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23; 3. Protecting outstanding natural features and landscape values as identified by Policy 25; 4. Protecting historic heritage values as identified by Policy 22; 5. Integrating Te Mana o Te Wai consistent with Policy 42; 6. Providing es for climate resilience and supporting a low or zero carbon contributing towards an efficient transport network consistent with Policies CC.1, CC.4, CC.10 and CC17; 7. Recognising es and providing es for values of significance to mana whenua / tangata whenua; 8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and b) the urban development is consistent with

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				<p>worded, anyone could prepare a structure plan for a proposed area for urban expansion and it would have weight under the policy. Council considers a structure plan under the policy needs to be prepared either in consultation with the relevant city or district council, or by the relevant city or district council in consultation with the regional council and other relevant stakeholders including iwi.</p> <p>7. Clause (d) - We note this is not consistent with NPS-UD Policy 8 as it refers to any urban development rather than plan changes. This has the effect of undermining or significantly reducing the importance of the other matters outlined in the policy. Council considers the policy needs to present a holistic list of matters that need to be applied when considering new areas for urban expansion via plan changes. The NPS-UD requirements mean the consideration of areas for potential urban expansion needs to consider other important factors such as the ability and timing of the availability of infrastructure, and the need for housing in particular locations. Clause (d) undermines a holistic approach to this consideration process, and we request it be deleted and replaced with wording in the beginning of the policy that aligns with the requirements of Policy 8 of the NPS-UD.</p> <p>8. Explanation - Council consider explanations should not accompany policies as they have no legal status under the RMA, but can often attempt to make up for poor policy drafting by including information that should be included in the policy itself. Council notes the explanation contains inaccuracies including attempting to give legal weight to the WRGF. As pointed out elsewhere in this submission, the WRGF was not prepared in accordance with the principles of consultation under the Local Government Act and it has no legal status under the RMA. Council requests the explanation be deleted entirely.</p>	<p>any a published Future Development Strategy, or the city or district Council's regional or local strategic growth strategy or plan and/or development framework or strategy that describes where and how future urban development should occur in that district or region, should the a Future Development Strategy be yet to be released published; and</p> <p>c) a structure plan has been prepared in consultation with the relevant city or district council, or by the relevant city or district council in consultation with the regional council, iwi and other relevant stakeholders; and/or) Any urban development that would provide for significant development capacity, regardless of if the development was out of sequence or unanticipated by growth or development strategies. d) The proposed development will provide housing in a part of the city or district that is identified in the latest Housing and Business Capacity Assessment as having a shortfall in plan-enabled housing capacity; and e) The proposed development will not result in reverse sensitivity effects on lawfully established activities or activities provided for in the district plan on adjacent land. Explanation Policy 55 gives direction to the matters that must be considered in any proposal that will result in urban development occurring beyond the region's existing urban areas. This includes ensuring that the qualities and characteristics of a well-functioning urban environment are provided for through clause (a),</p>

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				<p>9. Council is surprised not to see reference to natural wetlands in the policy. If this is an oversight, we request this be corrected.</p> <p>10. Council notes the requirements of the NZCPS regarding development that affects coastal natural character is not referred to. If this is an oversight, Council request the policy is amended to include relevant consideration of the NZCPS requirements.</p>	<p>which includes recognising values or resources identified elsewhere in the RPS. Clause (d) requires consideration of any proposal that would add significantly to development capacity, regardless of whether it is out of sequence or unanticipated by growth or development strategies. This clause gives effect to Policy 8 of the National Policy Statement on Urban Development. Clause (d) should be considered in conjunction with Policy UD.3. Clause (b) requires consideration to be given to the consistency of the development with the Future Development Strategy which will look to deliver well functioning urban environments through a regional spatial plan. To provide for the interim period where the Future Development Strategy is in development, clause (b) also requires consideration to be given to the consistency with any regional strategic growth and/or development framework which is currently the Wellington Regional Growth Framework. Clause (c) requires consideration to be given to whether a structure plan has been provided. A structure plan is a framework to guide the development or redevelopment of an area by defining the future development and land use patterns, areas of open space, the layout and nature of infrastructure (including transportation links), and other key features and constraints that influence how the effects of development are to be managed.</p>

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<p>S25 Carterton District Council</p>	<p>S25.041</p>	<p>Policy 55: Providing for appropriate urban expansion - consideration</p>	<p>Support</p>	<p>CDC supports the amendments to this policy.</p>	<p>Retain the policy.</p>
<p>S30 Porirua City Council</p>	<p>S30.072</p>	<p>Policy 55: Providing for appropriate urban expansion - consideration</p>	<p>Oppose</p>	<p>The policy lacks the necessary precision to enable its meaningful implementation, contains unnecessary duplication, and does not align with objectives. Issues of concern include:</p> <ul style="list-style-type: none"> • (a)(ii) repeats policies, an RPS and all its objectives and policies should be read as a whole, unless a specific objective or policy has primacy. There is also a risk in this approach of listing policies that certain policies are omitted. • In regard to (d) this goes beyond the scope of policy 8 of the NPS-UD which only applies to plan changes. Given this matter is also covered in proposed Policy UD.3, it would be better to cross-reference to policy 55 from UD.3. 	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>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 or maintaining the qualities 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 achieve the objectives and policies of the RPS apply the specific management or protection for values or resources identified by this RPS, including:</p> <p>1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29.2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as</p>

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					<p>identified by Policy 23,3. Protecting outstanding natural features and landscape values as identified by Policy 25,4. Protecting historic heritage values as identified by Policy 22,5. Integrates Te Mana o Te Wai consistent with Policy 42,6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17.7. Recognises and provides for values of significance to mana whenua / tangata whenua,8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and</p> <p>(b) the urban development is consistent with any the Wellington Region Future Development Strategy, or the regional or local strategic growth and/or development framework or strategy that describes where and how future urban development should will occur in that district or region, should if the Future Development Strategy has not been notified under section 83 of the Local Government Act 2002 be yet to be released; and/or</p> <p>(c) a structure plan has been prepared.; and/or</p> <p>(d) Any The urban development that would provide for significant development capacity, regardless of if the development was out of sequence or unanticipated by growth or development strategies. Explanation Policy 55 gives direction to the matters that must be considered in any proposal that will</p>

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					<p>result in urban development occurring beyond the region's existing urban areas. This includes ensuring that the qualities and characteristics of a well-functioning <i>urban environment</i> are provided for through clause (a), which includes recognising values or resources identified elsewhere in the RPS.</p>
<p>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</p>	<p>S34.013</p>	<p>Policy 55: Providing for appropriate urban expansion - consideration</p>	<p>Oppose in part</p>	<p>Council is concerned with some of the drafting of this policy and its application in relation to the definition of urban areas, which is zone based and does not recognise some of the zones of Upper Hutt, such as the Special Activity Zones, as well as the Settlements Zone, which is identified in the NPS- HPL as an urban zone. In this respect there seems to be a disconnect between this policy and the WRGF.</p> <p>It is unclear what "appropriate" means in the context of this policy and consider that the original policy wording title identifies more articulately, the outcome wished to be achieved.</p> <p>The policy seems to be being used to define "a well-functioning urban environment" which is already defined in the NPS-UD and does not take account of locational differences across the region. It is unclear how the extent of the 'urban development' is defined e.g. the extent of the existing built urban environment or by zoning as at August 2022.</p> <p>This policy, along with other provisions within RPSPC1 will make it very difficult for greenfield development to be achieved, when it is necessary to meet our housing needs.</p> <p>Clause a) and a)i) seems to take a provision in section 3.8 of the NPS that applies to out of sequence</p>	<p>Delete or amend to be consistent with the NPS-UD definition of a well-functioning urban environment, define 'urban development' and 'planned urban area' and read: "Policy 55: Providing for appropriate urban expansion Maintaining a compact, well designed and sustainable urban form regional form - consideration</p> <p>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 August 2022), particular regard shall be given to whether:</p> <p>a)</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</p> <p>....including</p> <ol style="list-style-type: none"> 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29, 2. Protecting indigenous ecosystems and

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>developments. This does not take account of future planned long-term development and does not allow Council to address capacity issues.</p> <p>Clause a)ii)1) refers to Policy 29, which is now proposed to read "manage" and not "avoid inappropriate" development and so there should be consistency between the two provisions.</p> <p>Clause a)ii)6) refers to policies that Council is seeking to be deleted or amended.</p> <p>Clause b) could apply to any document in the absence of the Future Development Strategy being released. It should be recognised that a future document should not be relied upon as is unknown what implications such a document would have. However, any future document that is incorporated through a future plan change should be sufficiently evidenced and supported or jointly developed by all local authorities.</p> <p>Clause c) it is unclear who is developing the structure plan and how. This needs to be collaborative and approved through a relevant process in order to be given any weight in decision making. A future plan change to incorporate this document should be undertaken at a later stage.</p> <p>Clause d) Council does not consider that Policy 8 of the NPS-UD intended that out of sequence or unanticipated development should be given regard to when considering an application for resource consent, since Policy 8 only appears to refer to plan changes. It is also unclear what is meant by significant / what thresholds or locations apply.</p> <p>Council also notes that there are interrelated factors that play a part in urban development including infrastructure delivery and funding (through mechanisms such as Long Term Plans and external funding programmes), that are not sufficiently financed</p>	<p>habitats with significant indigenous biodiversity values; as identified by Policy 23,</p> <p>6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17. b) the proposed urban development is consistent with any Future Development Strategy, or the Council's regional or local strategic growth and/or development framework or strategy that describes where and how future urban development should occur in that district or region, should the Future Development Strategy be yet to be released; and/or</p> <p>c) a structure plan has been prepared and approved by the wellington regional local authorities; and/or</p> <p>d) Any urban development</p> <p>.....</p> <p>Explanation</p> <p>....</p> <p>Clause (b) requires consideration... Future Development Strategy is in development, clause (b) also requires consideration to be given to the consistency with any regional strategic growth and/or development framework which is prepared and approved by the Wellington Region local authorities is currently the Wellington Regional Growth Framework..... Clause (d) requires consideration of any proposals that would add....."</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				and operate on different funding cycles.	
S115 Hutt City Council	S115.075	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	No reasons given	Retain as notified
S118 Peka Peka Farm Limited	S118.015	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Policy 55 extensively adds to the definition of a 'well-functioning urban environment', particularly through matter (ii). Matter (ii) cross-references to other topic areas of the RPS that are otherwise relevant considerations and do not need to be included here.	Amend Policy 55 as follows: "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 August 2022), particular regard shall be given to whether: (a) The urban development contributes to establishing or maintaining the qualities of a well-functioning urban environment, including: (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; (ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or resources identified by this RPS, including: 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29.2. 2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23.3. 3. Protecting outstanding natural features and landscape values as identified by Policy 25.4. 4. Protecting historic heritage values as identified by Policy 22.5. 5. Integrates Te Mana o Te Wai consistent with Policy 42.6. 6. Provides for climate resilience and supports a low or zero carbon

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					transport network consistent with Policies CC.1, CC.4, CC.10 and CC17.7. Recognises and provides for values of significance to mana whenua / tangata whenua, 8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and ..."
S119 Summerse t Group Holdings Limited	S119.004	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Policy 55 extensively adds to the definition of a well-functioning urban environment, particularly through matter (ii). Matter (ii) cross-references to other topic areas of the RPS that are otherwise relevant considerations and do not need to be included here.	Amend the policy to recognise the particular development requirements of certain development types, such as retirement villages, and by making the following changes: "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 August 2022), particular regard shall be given to whether: (a) The urban development contributes to establishing or maintaining the qualities of a well-functioning urban environment., including: (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; (ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or resources identified by this RPS, including: 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29, 2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23, 3. Protecting outstanding natural features and landscape values as identified by Policy 25, 4. Protecting historic heritage values as identified by Policy 22, 5. Integrates Te Mana o Te Wai consistent with Policy 42, 6. Provides for climate resilience and

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17. 7. Recognises and provides for values of significance to mana whenua / tangata whenua; 8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and ..."</p>
<p>S120 The Retirement Villages Association of New Zealand</p>	<p>S120.004</p>	<p>Policy 55: Providing for appropriate urban expansion - consideration</p>	<p>Support in part</p>	<p>Policy 55 extensively adds to the definition of a well-functioning urban environment, particularly through matter (ii). Matter (ii) cross-references to other topic areas of the RPS that are otherwise relevant considerations and do not need to be included here.</p>	<p>Amend the policy as follows: "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 August 2022), particular regard shall be given to whether: (a) The urban development contributes to establishing or maintaining the qualities of a well-functioning urban environment., including: (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; (ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or resources identified by this RPS, including: 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29, 2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23, 3. Protecting outstanding natural features and landscape values as identified by Policy 25, 4. Protecting historic heritage values as identified by Policy 22, 5. Integrates Te Mana o Te Wai consistent with Policy 42, 6. Provides for climate resilience and</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17.7. Recognises and provides for values of significance to mana whenua / tangata whenua; 8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and</p> <p>..."</p>
S124 KiwiRail Holdings Limited	S124.009	Policy 55: Providing for appropriate urban expansion - considerati on	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.	Retain as notified.
S125 R P Mansell; A J Mansell, & M R Mansell	S125.004	Policy 55: Providing for appropriate urban expansion - considerati on	Support	Consistent with the intent and requirements of the NPS-UD.	Retain as notified.
S125 R P Mansell; A J Mansell, & M R Mansell	S125.007	Policy 55: Providing for appropriate urban expansion - considerati on	Support in part	Accurately reflect the proposed new wording of clause (b)	Amend the explanation for Policy 55 (second sentence in paragraph two) to read: <i>"To provide for the interim period where the Future Development Strategy is in development, clause (b) also requires consideration to be given to the consistency with any regional strategic growth and/or development framework which is currently the Wellington Regional Growth framework, or any local strategic growth and/or development framework or strategy that describes where or how future urban</i>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					development should occur in a District."
S128 Horticulture New Zealand	S128.048	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	New urban development beyond the region's urban areas should consider highly productive land, which is recognised elsewhere in the (operative) RPS.	New subclause to be added under Policy 55(a)(ii) 9. Protecting highly productive land from inappropriate subdivision, use and development.
S129 Waka Kotahi NZ Transport Agency	S129.025	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Supports the integration of land use and transport infrastructure as a means of providing good environmental outcomes and supporting the efficient use of infrastructure. Supports urban expansion occurring as anticipated by strategic planning or zoning within district plans. However, seeks the prioritising of intensification of existing areas first. Out of sequence or out of zone urban expansion can result in the inefficient use of, and has adverse effects on, infrastructure.	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.
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.099	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Ātiawa note that Section 6 of the RMA states that in "achieving the purpose of this Act, ...shall recognise and provide for ... (e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga" Policy 55 does not adequately recognise and provide to these matters.	Amend as follows: 7. Recognises and provides for values, sites and areas of significance and other taonga to mana whenua / tangata whenua, Retain remainder of policy as drafted
S132 Toka Tu Ake EQC	S132.010	Policy 55: Providing for appropriate urban expansion - consideration	Support	Appropriate urban expansion and intensification should be zoned for areas which are at minimal risk from natural hazards, including predicted increase in risk from climate change. The RPS could assist in regulating how urban expansion progresses by providing policies on where it is appropriate.	Strengthen, require urbandevelopment and intensification to be zoned outside of areas at highrisk of natural hazards, or areaswhich will become high risk due tothe impacts of climate change. Aswith Policy 29, guidance on whatconstitutes high risk should beprovided.
S137 Greater Wellington Regional	S137.034	Policy 55: Providing for appropriate	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Council (GWRC)		urban expansion - consideration		to this effect in the relevant policy explanations will assist with clarity.	22, apply to all urban areas in the Wellington Region.
S137 Greater Wellington Regional Council (GWRC)	S137.038	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Add 'improving' into clause (a) for consistency with Policy 31.	Amend clause (a) to read: (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:
S137 Greater Wellington Regional Council (GWRC)	S137.039	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	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.	Amend subclause (a)(ii)(1) to read: (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: 1. Avoiding inappropriate Managing subdivision, use and development in accordance with the risk areas at from natural hazards as required by Policy 29;
S137 Greater Wellington Regional Council (GWRC)	S137.040	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	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.	Amend subclause (a)(ii)(6) to read: 6. Providing ing es for climate resilience and supporting s a low and zero-carbon multi modal transport network consistent with Policies CC.1, CC.4, CC.940 and CC147;
S137 Greater Wellington Regional Council (GWRC)	S137.041	Policy 55: Providing for appropriate	Support in part	Amendments are required to improve readability, consistency and clarity, including fixing references to policy numbers.	Amend clause (d) to read: (d) the Any urban development that would provide for significant development capacity as outlined in

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Council (GWRC)		urban expansion - consideration			Policy UD.3 , regardless of if the development was out of sequence or unanticipated by growth or development strategies.
S137 Greater Wellington Regional Council (GWRC)	S137.042	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	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.	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
S137 Greater Wellington Regional Council (GWRC)	S137.043	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	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.	Insert a new sentence in the Explanation section Explanation ...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.
S140 Wellington City Council (WCC)	S140.076	Policy 55: Providing for appropriate urban expansion - consideration	Support	Support as proposed.	Retain as notified.
S144 Sustainable Wairarapa Inc	S144.030	Policy 55: Providing for appropriate urban expansion -	Support in part	Change "appropriate" to "well-functioning", and change "expansion" to "growth", as to many readings "expansion" implies spatial (sprawling) growth, which is to be discouraged.	Amend the policy to read: Policy 55: Providing for appropriate well-functioning urban expansion growth - consideration

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S148 Wellington International Airport Ltd (WIAL)	S148.051	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	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.
S151 NZ Centre for Sustainable Cities	S151.017	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	<p>Policy 55 of Objective CC.6 would now have wording that is weaker, from a climate mitigation viewpoint, than before. To date the wording has been put in terms of maintaining a compact and sustainable regional form, but this is now proposed to be abandoned in favour of expansion that is 'appropriate',</p> <p>See this move away from a goal of compact urban sustainability as highly undesirable and contradictory to the Council's broader stated intentions. 'Appropriate urban expansion' is ambiguous and could mean almost anything. In the absence of clear countervailing planning goals, and with development pressures in such areas that seem oblivious to the desirability of constraining urban form to support climate change mitigation and contain infrastructure costs (Adams & Chapman, 2016), the proposed Policy 55 would exacerbate rather than address several important problems identified in Chapter 3.9, particularly "A lack of integration between land use and the region's transportation network can create patterns of development that increase the need for travel, the length of journeys and reliance on private motor vehicles".</p>	<p>Amend Policy 55 with wording that unequivocally supports intensifying urban development within the contiguous urban form of the region, implicitly supporting the vision of the 15-minute city with its focus on local active and public transport, containing infrastructure costs, and significantly reducing GHG emissions below the path they would take otherwise.</p> <p>We would recommend not revising Policy 55, but retaining the current wording [of the operative RPS].</p>
S154 Investore Property Limited	S154.005	Policy 55: Providing for appropriate urban expansion -	Oppose in part	Policy 55 fails to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.	Amend Policy 55 to recognise that intensification is to be focused around major centres and rapid transit nodes, to support well functioning urban environments.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S155 Stride Investment Management Limited	S155.004	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	Policy 55 fails to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.	Amend Policy 55 to recognise that intensification is to be focused around major centres and rapid transit nodes, to support well functioning urban environments.
S162 Winstone Aggregates	S162.016	Policy 55: Providing for appropriate urban expansion - consideration	Oppose in part	The amendments to this policy fail to recognise the importance of protecting regionally significant quarries/mineral/aggregate resource as provided in Policy 60 and Objective 30 RPS.	new subclause under (a) 9. Protecting Regionally Significant Mineral/Aggregate Resources from inappropriate development.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.077	Policy 55: Providing for appropriate urban expansion - consideration	Oppose	The policy is poorly drafted. There is an inconsistency with the requirement to "have particular regard to" a later requirement that the Council "shall apply". The direction is either to have particular regard to the RPS provisions requiring protection of values or to apply those provisions. The matters under Policy 55(a)(ii) should to be applied not had particular regard to.	Amend Policy 55 to ensure that the requirements in Policy 55(a)(ii) are required to be applied, not matters to which particular regard has to be had. Make consequential amendments to explanation.
S170 Te Rūnanga o Toa Rangatira	S170.061	Policy 55: Providing for appropriate urban expansion - consideration	Not Stated / Neutral	Policy 55 Establishing and maintaining well-functioning urban environments - consideration In clause 7, suggest delete the word 'recognise 'and just keep the provide for to strengthen the intention.	[Note. the policy title quoted in this submission point does not align with the RPS Change1 documents, but the Decision Requested seem to be correctly referenced] Amend clause 7: 7. Recognises and p Provides for values of significance to mana whenua / tangata whenua,

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S167 Taranaki Whānui	S167.0117	Policy 55: Providing for appropriate urban expansion - consideration	Support	Taranaki Whānui supports the amendments to Policy 55.	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0172	Policy 55: Providing for appropriate urban expansion - consideration	Support in part	Recognition and provision for values of significance to tangata whenua is supported; however, subclause (a)(ii)(7) should be expanded to provide for the matters set out in s.6 of RMA. The same issues affect both urban expansion and rural development, therefore this policy and Policy 56 should be amended to be consistent and to address the same matters.	Amend subclause (a)(ii)(7) of the policy to recognise and provide for the matters in Section 6(e) and 6(g) of the RMA, rather than 'values of significance' to tangata whenua. Amend as necessary, together with Policy 56, to ensure consistency between the two policies.
S16 Kāpiti Coast District Council	S16.041	Policy 56: Managing development in the rural areas - consideration	Oppose	Council notes the policy attempts to place legal weight on the WRGF under the RMA, which Council has expressed opposition to elsewhere in this submission. This is opposed and deletion to the WRGF is sought from Policy 56. Council also notes the policy duplicates one of the many matters addressed in Policy 55. This is unnecessary and creates policy overlap and the potential for conflict between the policies. Council seeks amendments to address these concerns. Council's requested amendments will ensure that in the case of proposed new urban development the matters contained in Policy 55 will be addressed.	Amend Policy 56 as follows: d) in the case of proposed new urban development , the proposal is consistent with Policy 55 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; or (e) in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity. Explanation Policy 56 recognises the tension that exists between urban and rural development on the fringe of urban areas and seeks to manage this tension such that well-functioning urban environments and urban areas are established and

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					maintained.
S29 Aggregate and Quarry Association (AQA)	S29.002	Policy 56: Managing developme nt in the rural areas - considerati on	Support	<p>Given quarrying is included in the definition of Primary Production in the National Planning Standards. It is very important because even more so than other primary production activities, aggregate is a locationally constrained resource, as discussed above. For this reason, it is important that access to potential aggregate resources is not shut off by other development and alternative land uses or reverse sensitivity.</p> <p>Due to its weight and volume, aggregate is very expensive to transport which reinforces the case for council planning to identify where the rock is located and protect those areas from other uses. Quarries need to be able to operate in close proximity to urban populations because transport is the big cost in each truckload of delivered aggregate, rock or sand.</p>	Retain as notified, in particular the subclause (a)
S30 Porirua City Council	S30.073	Policy 56: Managing developme nt in the rural areas - considerati on	Support in part	Amend to address minor typographical error.	<p>Amend policy: When considering an application for a resource consent or a change, variation or review of a district plan, in rural areas (as at August 2022), particular regard shall be given to whether:</p> <p>(a) the proposal will result in a loss of productive capability of the rural area, including cumulative impacts that would reduce the potential for food and other primary production and reverse sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals;</p> <p>(b) the proposal will reduce aesthetic and open space values in rural areas between and around settlements;</p> <p>(c) the proposal's location, design or density will minimise demand for non- renewable energy resources; and</p> <p>(d) the proposal is consistent with any Future Development Strategy, or the regional or local</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					strategic growth and/or development framework or strategy that addresses future rural development, should the Future Development Strategy be yet to be released; or (e) in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.014	Policy 56: Managing development in the rural areas - consideration	Oppose in part	Regard should be given to local growth strategies in the absence of an FDS, not regional strategies for which the impact of provisions at a district level are unclear and unknown. It is inappropriate to rely on a document that does not exist and only existing documents available at the time of policy development should be relied upon.	Amend to read: "When considering an application for a resource consent or a change, variation or review of a district plan, in rural areas (as at August 2022), particular regard shall be given to whether: (d) the proposal is consistent with 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; or(e) in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity."
S78 Beef + Lamb New Zealand Limited	S78.015	Policy 56: Managing development in the rural areas - consideration	Not Stated / Neutral	Accepts that the amendments to operative Policy 56 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
S79 South Wairarapa	S79.047	Policy 56: Managing developme	Support	The policy is supported, but puts too much weight on (a) over (d). This is reflected in the recently gazetted National Policy Statement for Highly Productive Soils	Amend Policy 56 as follows: When considering an application for a resource consent or a change, variation or review of a district plan, in rural

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
District Council		nt in the rural areas - consideration		(NPS - HPS). While SWDC seeks amendment here, we do not seek that the NPS HPS is implemented in its entirety in this process, it is particularly relevant to this policy and for growth in our district.	<p>areas (as at March 2009 August 2022), particular regard shall be given to whether:</p> <p>(a) the proposal will result in a loss of productive capability of the rural area, including cumulative impacts that would reduce the potential for food and other primary production excluding land identified in (d) and reverse sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals;</p> <p>(b) the proposal will reduce aesthetic and open space values in rural areas between and around settlements;</p> <p>(c) the proposals location, design or density will minimise demand for nonrenewable energy resources; and</p> <p>(d) the proposal is consistent with 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;</p> <p>or</p> <p>(e) 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>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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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S115 Hutt City Council	S115.076	Policy 56: Managing development in the rural areas - consideration	Support in part	Support in relation to changes, variations, and reviews of district plans. However, for territorial authority land use and subdivision consents, this level of assessment is likely to be redundant given the more detailed objectives, policies, and assessment criteria that would be included in rural zone and subdivision chapters.	Amend Policy 56 insofar as it applies to resource consents, so that it only applies to regional resource consents.
S118 Peka Peka Farm Limited	S118.016	Policy 56: Managing development in the rural areas - consideration	Support in part	<p>Policy 56 lists a range of considerations for the management of development in rural areas. Matter (a) relates to impacts on productive land. This matter may well have been overtaken by the introduction of the NPS on Highly Productive Soils and could be removed pending GWRC giving effect to the NPS.</p> <p>Matter (d) requires consideration of the consistency of a development with a Future Development Strategy or other growth strategy and is reflective of Policy 55 above. Matter (e) notes that in the absence of such a strategy consideration is required of the pressure development may put on existing services and infrastructure.</p> <p>While the policy mirrors Policy 55 in terms of reflecting consideration of growth strategies, it does not similarly reflect Policy 55 in considering 'out of sequence' development. Either the policy is intending to duplicate the matters in Policy 55 with respect to growth management in which case it should mirror all relevant aspects, or matters (d) and (e) should be removed and Policy 55 and UD.3 should be relied upon.</p>	<p>Amend Policy 56 as follows:</p> <ul style="list-style-type: none"> • Re-considering whether matter (a) remains necessary as currently worded given the introduction of the NPS on Highly Productive Soils; • Remove duplication, or ensure consistency, between Policies 55, 56 and UD.3.
S119 Summerseat Group Holdings Limited	S119.005	Policy 56: Managing development in the rural areas - consideration	Support in part	<p>Policy 56 lists a range of considerations for the management of development in rural areas. Matter (a) relates to impacts on productive land. This matter may well have been overtaken by the introduction of the NPS on Highly Productive Soils and could be removed pending GWRC giving effect to the NPS.</p> <p>Matter (d) requires consideration of the consistency of a development with a Future Development Strategy or other growth strategy and is reflective of Policy 55 above. Matter (e) notes that in the absence of such a</p>	<p>Amend Policy 56 as follows:</p> <ul style="list-style-type: none"> • Re-considering whether matter (a) remains necessary as currently worded given the introduction of the NPS on Highly Productive Soils; • Remove duplication, or ensure consistency, between policies 55, 56 and UD.3.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>strategy consideration is required of the pressure development may put on existing services and infrastructure.</p> <p>While the policy mirrors Policy 55 in terms of reflecting consideration of growth strategies, it does not similarly reflect Policy 55 in considering 'out of sequence' development. Either the policy is intending to duplicate the matters in Policy 55 with respect to growth management in which case it should mirror all relevant aspects, or matters (d) and (e) should be removed and Policy 55 and UD.3 should be relied upon.</p>	
S120 The Retirement Villages Association of New Zealand	S120.005	Policy 56: Managing development in the rural areas - consideration	Support in part	<p>Policy 56 lists a range of considerations for the management of development in rural areas. Matter (a) relates to impacts on productive land. This matter may well have been overtaken by the introduction of the NPS on Highly Productive Soils and could be removed pending GWRC giving effect to the NPS.</p> <p>Matter (d) requires consideration of the consistency of a development with a Future Development Strategy or other growth strategy and is reflective of Policy 55 above. Matter (e) notes that in the absence of such a strategy consideration is required of the pressure development may put on existing services and infrastructure.</p> <p>While the policy mirrors Policy 55 in terms of reflecting consideration of growth strategies, it does not similarly reflect Policy 55 in considering 'out of sequence' development. Either the policy is intending to duplicate the matters in Policy 55 with respect to growth management in which case it should mirror all relevant aspects, or matters (d) and (e) should be removed and Policy 55 and UD.3 should be relied upon.</p>	<p>Amend Policy 56 as follows:</p> <ul style="list-style-type: none"> • Re-considering whether matter (a) remains necessary as currently worded given the introduction of the NPS on Highly Productive Soils; • Remove duplication, or ensure consistency, between policies 55, 56 and UD.3.
S124 KiwiRail Holdings Limited	S124.010	Policy 56: Managing development in the rural areas -	Support in part	<p>KiwiRail supports the intent of Policy 56 to provide a framework that manages development in rural areas in accordance with sound resource management principles. A further amendment is proposed to expressly recognise and provide for the avoidance of reverse sensitivity effects as one of those principles, as this is a critical resource management issue that must</p>	<p><i>[Note: stated "Seek amendment" in original submission]</i></p> <p>New subclause.(f) the proposal will result in reverse sensitivity effects.</p>

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		consideration		be managed when providing for growth of urban activities near lawfully established transport corridors.	
S125 R P Mansell; A J Mansell, & M R Mansell	S125.006	Policy 56: Managing development in the rural areas - consideration	Support	Objective 22B is to be implemented through Policy FW.7 (Water attenuation and retention - non-regulatory) and Policy 56 (Managing development in rural areas - consideration). The submitters generally support the proposed new Objective 22B and the implementation of this objective through Policy 56, and consider they are consistent with the intent and requirements of the NPS-UD.	The submitters seek the intent of the proposed new Objective 22B and the implementation of this objective through Policy 56 to be retained as currently written.
S125 R P Mansell; A J Mansell, & M R Mansell	S125.008	Policy 56: Managing development in the rural areas - consideration	Support	The amendments provide for the interim period where the Future Development Strategy is in development and recognises the tension that exists between urban and rural development on the fringe of urban areas.	Retained as notified.
S128 Horticulture New Zealand	S128.049	Policy 56: Managing development in the rural areas - consideration	Support in part	<p>Support retaining the considerations in (a), however the policy could be more specific as to the type of development is trying to capture. The explanation to the policy previously stated that it relates to urban development and rural residential development, this clarity has been removed.</p> <p>Interest in ensuring that primary production activities are appropriately provided for (and enabled) in the rural environment; this is important for meeting national direction around highly productive land and also emissions reduction.</p> <p>The policy intent in the Section 32 evaluation report indicates the focus of this policy is on urban development.</p>	<p>Provide clarity as to what this policy applies to by adding a sentence to the main body: This policy applies to urban development and rural residential development.</p> <p>OR</p> <p>Retain the main body and add a new subclause: (x) The use of highly productive land for food production is enabled.</p>
S129 Waka Kotahi NZ Transport Agency	S129.026	Policy 56: Managing development in the rural areas -	Support in part	Supports the direction of Policy 56 where it manages development in rural areas. Dispersed development is at odds with the MDRS direction to centralise development and intensify our urban centres. Supports the inclusion of more direction that intensification is prioritised ahead of greenfield developments and	Amend the provisions to address the relief sought in the submission. Supports the inclusion of more direction that intensification is prioritised ahead of greenfield developments and development of rural areas. If development is to occur in rural areas, then the provision of

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		consideration		development of rural areas. If development is to occur in rural areas, then the provision of mode choice options should be required.	mode choice options should be required.
S136 DairyNZ	S136.018	Policy 56: Managing development in the rural areas - consideration	Support in part	Update Policy to be in line with National Policy Statement on Highly Productive Land.	Amend Policy 56 to be consistent with National Direction.
S137 Greater Wellington Regional Council (GWRC)	S137.044	Policy 56: Managing development in the rural areas - consideration	Support in part	Amendments are required to align with the National Policy Statement for Highly Productive Land 2022. The addition of cultural values is to incorporate feedback received on the draft RPS Change 1.	Amend clause (b) to read: (b) the proposal will reduce aesthetic, cultural and open space values in rural areas between and around settlements;
S137 Greater Wellington Regional Council (GWRC)	S137.045	Policy 56: Managing development in the rural areas - consideration	Support in part	Amendments are required to align with the National Policy Statement for Highly Productive Land 2022. The addition of cultural values is to incorporate feedback received on the draft RPS Change 1.	Insert new clause (c) (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;
S137 Greater Wellington Regional Council (GWRC)	S137.046	Policy 56: Managing development in the rural areas - consideration	Support in part	Amendments are required to align with the National Policy Statement for Highly Productive Land 2022. The addition of cultural values is to incorporate feedback received on the draft RPS Change 1.	Insert a sentence in the Explanation section: 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.
S140 Wellington City Council (WCC)	S140.077	Policy 56: Managing development in the rural areas	Support in part	This policy is confusing, in that it gives particular regard to matters that the RPS presumably wants to happen, and matters the RPS presumably doesn't want to happen, without a clear statement about which state it	Amend with this text, or similar: (a) the proposal will result in a loss of retain the productive capability of the rural area, including minimising cumulative impacts that would reduce

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		- consideration		prefers. The policy should be worded to consistently refer to the outcomes the RPS wants.	the potential for food and other primary production and reverse sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals; (b) the proposal will reduce retain or enhance aesthetic and open space values in rural areas between and around settlements; (c) the proposal's location, design or density will minimise demand for non-renewable energy resources; and (d) the proposal is consistent with 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; or (e) in the absence of such a framework or strategy, the proposal will not increase pressure for public services and infrastructure beyond existing infrastructure capacity.
S166 Masterton District Council	S166.038	Policy 56: Managing development in the rural areas - consideration	Support	The contents of this policy is being considered as part of the Wairarapa Combined District Plan review.	Retain as notified.
S170 Te Rūnanga o Toa Rangatira	S170.062	Policy 56: Managing development in the rural areas -	Not Stated / Neutral	Mana Whenua and iwi have land in rural areas that was returned through the Deed of Settlement Acts. Policy 56 consideration needs to include the execution of Tino Rangatiratanga on this land and to be able to allow the land aspirations of iwi and Māori is accounted for.	Consideration needs to include the execution of Tino Rangatiratanga on land that was returned through the Deed of Settlement Acts and provide for the land aspirations of iwi and Māori.

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		consideration			
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0100	Policy 56: Managing developme nt in the rural areas - considerati on	Oppose in part	As it is drafted the policy does not provide for an assessment of the potential impacts of development in rural areas on the natural environment. While Ātiawa recognise that rural areas should maintain their productive nature, it is also realistic to expect development to occur in rural areas, particularly on the fringe of urban settlements. Therefore, Ātiawa seek additional considerations to be included in this policy.	Include new subclauses: (f) the proposal will adversely impact on mana whenua values, including the relationship with traditions, ancestral lands, water, sites, wāhi tapu and other taonga;(g) the proposal is resilient to climate change(h) integrates Te Mana o te Wai consistent with Policy 42(i) protecting indigenous ecosystems and habitats with significant biodiversity values as identified in Policy 23
S167 Taranaki Whānui	S167.0118	Policy 56: Managing developme nt in the rural areas - considerati on	Support in part	Taranaki Whānui request amendment to be made.	Insert a new clause: (x) the proposal will affect cultural values in rural areas between and around settlements.
S168 Rangitāne O Wairarapa Inc	S168.0173	Policy 56: Managing developme nt in the rural areas - considerati on	Support in part	Provisions partially amended to reflect suggested amendments (Amend Policy 56, 2 May Hui). Recommended amendment to consider whether the proposal is resilient to climate change and provides for adaption in accordance with CC adaptation policies of the RPS has not been included in the amendment.	Include a requirement for consideration of whether the proposal is climate change resilient and provides for adaptation in accordance with the relevant climate change policies;
S168 Rangitāne O Wairarapa Inc	S168.0174	Policy 56: Managing developme nt in the rural areas - considerati on	Support in part	Clause (a) combines issues that should be addressed separately as they relate to quite separate matters (i.e. loss of productive land, reverse sensitivity issues).	Address the issue of loss of production land and reverse sensitivity as two separate matters, rather than as part of the same clause, as they are not necessarily related;

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S168 Rangitāne O Wairarapa Inc	S168.0175	Policy 56: Managing development in the rural areas - consideration	Support in part	Reference to 'aesthetic' values in clause (b) is inappropriately narrow and should be replaced by reference to 'amenity' values, which would cover a broader range of relevant values.	Amend the policy to: Replace reference to 'aesthetic' values with a broader reference to 'amenity' values;
S168 Rangitāne O Wairarapa Inc	S168.0176	Policy 56: Managing development in the rural areas - consideration	Support in part	Rangitāne o Wairarapa notes that the National Policy Statement - Highly Productive Land has now been published. The policy should be reviewed to ensure that it is consistent with and gives effect to this National Policy Statement.	Review the policy to ensure it is consistent with and gives effect to the National Policy Statement - Highly Productive Land.
S168 Rangitāne O Wairarapa Inc	S168.0177	Policy 56: Managing development in the rural areas - consideration	Support in part	The explanatory note for Policy 56 does not appear to relate to the policy and causes confusion.	Amend the explanatory text to better reflect the matters covered by Policy 56 and ensure consistency with the explanation for Policy 55.
S16 Kāpiti Coast District Council	S16.042	Policy 57: Integrating land use and transportation - consideration	Support in part	Although Council supports the principle of improved alignment between resource management decisions and the Regional Land Transport Plan, it is unclear how this would be delivered through the policy particularly as the explanation supporting the policy appears to conflict with the policy itself. The explanation states the policy is relevant to the consideration of proposals that affect land transport outcomes. We note the policy requires more than this and does not contain any thresholds for when the policy would need to be applied or given effect to in district plans.	Delete Policy 57 or amend so it: 1. applies only to the consideration of proposals that affect land transport outcomes (that are within the powers of city and district councils); and 2. Provides clear thresholds for when the policy would need to be applied or given effect to in district plans (limited to the powers city and district councils have).
S25 Carterton District Council	S25.042	Policy 57: Integrating land use and transportation -	Support	CDC supports integrated development in the Eastern Growth corridor - Hutt to Masterton. However, CDC does not consider that this policy in its proposed form is appropriate in Carterton. The public transport network in the Wairarapa is limited, and as a predominantly rural area, there are practical limits to the way in which public transport can be utilised. While active modes can be	Amend the policy as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, require land use and transport planning within the Wellington

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		consideration		<p>encouraged, and the rail network provides a linkage to other towns on the Wairarapa line, the heavy emphasis on public transport networks is not appropriate in the Wairarapa context.</p> <p>CDC is concerned that the policy requires that land use and transport planning is integrated for new development and would instead support the policy seeking 'particular regard' be given to these matters in Carterton.</p> <p>Requiring this for consent applications for land use and development is also onerous and has the potential to create a significant burden in preparation and processing of consents for relatively small developments. Softening the wording will allow some discretion in when this policy should be considered.</p>	<p>Region is integrated in a way which have particular regard to the way in which land use and transport planning is integrated within the Wellington Region, so that it:</p> <p>(a) supports a safe, reliable, inclusive and efficient transport network;</p> <p>(b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity;</p> <p>(c) minimises private vehicle travel and trip length, where practical, while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes;</p> <p>(d) encourages an increase in the amount of travel made by public transport and active modes;</p> <p>(e) provides for well-connected, safe and accessible multi modal transport networks, where practical, while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical;</p> <p>(f) supports and enables the growth corridors in the Wellington Region, including:</p> <p>(i) Western Growth Corridor - Tawa to Levin;</p> <p>(ii) Eastern Growth Corridor - Hutt to Masterton;</p> <p>(iii) (iii) Let's Get Wellington Moving Growth Corridor.</p>
S30 Porirua	S30.074	Policy 57: Integrating land use	Oppose	<p>Council opposes proposed amendments to policy 57 and seek they are deleted for the following reasons:</p> <ul style="list-style-type: none"> • It is unclear how the requirement to 'require land use 	Delete proposed amendments to policy.

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City Council		and transportati on - considerati on		<p>and transport planning within the Wellington Region is integrated in a way' relates to resource consents or notices of requirement. The regulatory policies will be implemented in district plans through methods such as zoning, district wide provisions and distribution of land use management frameworks.</p> <p>These methods better achieve the objectives of the RPS and higher order planning instruments, such as the NPS-UD.</p> <ul style="list-style-type: none"> • The policy duplicates the regulatory policies in other chapters of the RPS including Chapter 4.1 and as such represents an unnecessary regulatory burden. • The explanation to the policy states that it is intended for considering proposals that affect land transport outcomes, but the policy is drafted in a way that it extends beyond this. It also contains no thresholds for development types and scale to be considered. For example, would it apply to a dormer window that breaches a height in relation to boundary standard in a district plan. • Clarity or policy direction is needed on what is meant by an 'inclusive transport network'. • It is unrealistic to require resource management plans and consents to minimise private vehicle use. The tools and methods for achieving this, such as congestion charging, lie outside of the resource management system. • References or a map needed to identify the Western Growth Corridor, Eastern Growth Corridor, and Let's Get Wellington Moving Growth Corridor. 	
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.015	Policy 57: Integrating land use and transportati on - considerati on	Oppose	<p>Many of these matters are outside the control of district and city councils and so this cannot be achieved.</p> <p>This policy applies no threshold and means that even small developments or applications for alterations or a change of use to a building would be captured by this rule, placing undue burden on Council and developments.</p> <p>Clause b) is too onerous for resource consents. Particular examples are new tourism related activities in</p>	<p>Define low carbon modes amend to read: "When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, require land use and transport planning within the Wellington Region is integrated in a way which: (b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity;(c) minimises private vehicle travel</p>

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				<p>rural areas accommodation or experiences and will stymie comprehensive development opportunities that grow over time.</p> <p>d) is duplicating c)</p> <p>Under clause e) low carbon modes should be defined. Council is also concerned that the provision of public transport is not a function of the district plan and relies on services being provided by other organisations / agencies.</p>	<p>and trip length while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes;(d) _____encourages an increase in the amount of travel made by public transport and active modes; (e) provides for consider where practicable enabling a well-connected, safe and accessible multi modal transport networks while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical; ... Explanation: Policy 57 lists matters that need to be given particular regard when considering considered for all proposals that affect land transport outcomes. It seeks to align with the Wellington Regional Land Transport Plan and support decarbonising the transport system in the Wellington Region"</p>
<p>S79 South Wairarapa District Council</p>	<p>S79.048</p>	<p>Policy 57: Integrating land use and transportati on - considerati on</p>	<p>Support in part</p>	<p>CDC supports integrated development in the Eastern Growth corridor - Hutt to Masterton. However, SWDC does not consider that this policy in its proposed form is appropriate in the district outside of Featherston and potentially the proposed Woodside growth area. The public transport network in the Wairarapa is limited, and as a predominantly rural area, there are practical limits to the way in which public transport can be utilised. While active modes can be encouraged, and the rail network provides a linkage to other towns on the Wairarapa line, the heavy emphasis on public transport</p>	<p>Amend the policy as follows: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, require land use and transport planning within the Wellington Region is integrated in a way which have particular regard to the way in which land use and transport planning is integrated within the Wellington Region, so that it: (a) supports a safe, reliable, inclusive and</p>

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				<p>networks is not appropriate in the Wairarapa context. SWDC is concerned that the policy requires that land use and transport planning is integrated for new development and would instead support the policy seeking 'particular regard' be given to these matters in Carterton.</p> <p>Requiring this for consent applications for land use and development is also onerous and has the potential to create a significant burden in preparation and processing of consents for relatively small developments. Softening the wording will allow some discretion in when this policy should be considered.</p>	<p>efficient transport network;</p> <p>(b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity;</p> <p>(c) minimises private vehicle travel and trip length, where practical, while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes;</p> <p>(d) encourages an increase in the amount of travel made by public transport and active modes;</p> <p>(e) provides for well-connected, safe and accessible multi modal transport networks, where practical, while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical;</p> <p>(f) supports and enables the growth corridors in the Wellington Region, including:</p> <p>(i) Western Growth Corridor - Tawa to Levin;</p> <p>(ii) Eastern Growth Corridor - Hutt to Masterton;</p> <p>(iii) Let's Get Wellington Moving Growth Corridor.</p> <p>Or, similar relief to the same effect; AND;</p> <p>Any consequential amendments to give effect to the relief sought</p>
<p>S115 Hutt City Council</p>	<p>S115.077</p>	<p>Policy 57: Integrating land use and transportation -</p>	<p>Support in part</p>	<p>While we support direction on this issue to inform decisions on district plans, this type of analysis should be complete at plan-making stage and it is redundant and infeasible to reconsider the issue from scratch for each resource consent.</p>	<p>Amend Policy 57 so that it does not apply to resource consents.</p>

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		consideration			
S124 KiwiRail Holdings Limited	S124.011	Policy 57: Integrating land use and transportation - consideration	Support in part	<p>KiwiRail supports the intent of Policy 57 but considers that express recognition is needed for the consideration of reverse sensitivity effects which must be carefully managed when providing for land use and transport integration.</p> <p>KiwiRail considers express recognition of reverse sensitivity effects is necessary to ensure development near transport corridors can co-exist in an appropriate way. The Resource Management (Enabling Housing Supply) Amendment Act also expressly recognises and provides a nuanced approach to development where qualifying matters apply (including for example the provision of nationally or regionally significant infrastructure).</p>	<p><i>[Note: stated "Seek amendment" in original submission]</i> New subclause.</p> <p>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.</p>
S129 Waka Kotahi NZ Transport Agency	S129.011	Policy 57: Integrating land use and transportation - consideration	Support in part	<p>Supports Policy 57(e) to prioritise the integration of land use and transportation. Transport choices and proximity to multimodal choices enables well-functioning urban areas and needs to be considered early.</p> <p>However notes that lower order documents could interpret an inconsistency between Policy 57 and 58.</p>	Seeks clarification regarding the inconsistency between Policy 57 and Policy 58.
S133 Muaūpoko Tribal Authority	S133.062	Policy 57: Integrating land use and transportation - consideration	Support	Supports these policies surrounding effective management and measures for climate change and climate change effects.	Retain as notified.
S140 Wellington City Council (WCC)	S140.078	Policy 57: Integrating land use and transportation - consideration	Support in part	Applying this requirement to resource consents will result in unnecessary bureaucracy. This policy is about integrated land use and transport planning, which is best done through a plan change, or where a new notice of requirement is applied overtop. Integration is best achieved through plan provisions, not RPS consideration at individual consent level.	Amend with this text, or similar: When considering a an application for a resource consent , notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development , require land use and transport planning within the Wellington Region is to be integrated in a way

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					which: ...
S144 Sustainable Wairarapa Inc	S144.005	Policy 57: Integrating land use and transportation - consideration	Support	Combatting sprawl is key to reducing GHG emissions across all sectors.	Retain as notified.
S148 Wellington International Airport Ltd (WIAL)	S148.052	Policy 57: Integrating land use and transportation - consideration	Support in part	WIAL generally supports the intent of this policy, however this should be directed at the district level (to influence zoning decisions for example) rather than requiring applicant for a resource consent (for example) to have to demonstrate consistency with all of the matters set out in (a) - (f).	This policy should be amended so that it is directed at a higher level rather than as a consideration for each and every resource consent application. Otherwise delete the amendments to the Policy.
S163 Wairarapa Federated Farmers	S163.077	Policy 57: Integrating land use and transportation - consideration	Oppose	This policy should only apply within urban areas or within proposed areas for urban expansion. Land users in remote rural areas with limited options for transportation and movement of people and goods, should not be required to commit to needless costs and delays in assessing alternatives in resource consent applications - for little or no environmental benefit	That the amendments to Policy 56 be amended to the following or similar effect: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development for land within urban areas or within proposed areas for urban expansion, Delete the FW icon
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.078	Policy 57: Integrating land use and transportation - consideration	Support		Retain

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S166 Masterton District Council	S166.039	Policy 57: Integrating land use and transportation - consideration	Not Stated / Neutral	Public transport in the Masterton District and throughout the Wairarapa is significantly limited in comparison to the Hutt, Wellington, and Porirua regions. We are interested in further clarity on the extent that land use can be integrated with transport.	Clarifications. Further clarity requested on how this policy can be implemented in the Wairarapa.
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.0101	Policy 57: Integrating land use and transportation - consideration	Support	Ātiawa supports the overall intent of Policy 57. Ātiawa wants to ensure that maximising modal shift from private vehicles to public transport or active modes does not exacerbate existing inequalities. That is, ensuring accessibility for all capabilities - those who cannot easily walk or cycle, ensuring equity for Māori, and those with care-giving responsibilities. For example it is reported that low-income people in some areas consider it essential to own a car, because they have no other way to do what they need to get done in their lives. Work and other activities are not close enough to walk to; the cycling networks are not safe enough; and public transport is neither frequent nor direct for people who do not work in the central city and live close to train lines or rapid bus routes. Ātiawa seeks that the Regional Council actively partner with mana whenua and other parts of the community who are most impacted by the proposed policy to provide the greatest benefit to all.	Retain as notified.
S167 Taranaki Whānui	S167.0119	Policy 57: Integrating land use and transportation -	Support in part	Lower-decile areas (including Māori) have been historically disadvantaged by the public transport system. Focus needs to be on equity.	Insert a new clause: (x) supports an equitable transport network

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		consideration			
S168 Rangitāne O Wairarapa Inc	S168.0146	Policy 57: Integrating land use and transportation - consideration	Support	Rangitāne o Wairarapa support the list of matters that are required to be given particular regard when considering proposed development that may affect land transport outcomes. However, Clause (e) should be amended to ensure that public transport provision is sequenced such that the 'period of time where public transport is not efficient and / or practical' is minimised to the extent possible.	Amend Clause (e) to reflect a requirement to minimise any period where servicing of subdivision or development by public transport is likely to be inefficient or impractical, as far as practicable.
S168 Rangitāne O Wairarapa Inc	S168.0178	Policy 57: Integrating land use and transportation - consideration	Support	Rangitāne o Wairarapa supports the content and intent of this policy.	Retain as notified.
S10 Transpower New Zealand Limited	S10.006	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	Transpower considers that it is important to provide policy direction to enable the infrastructure to support the urban development. The RPS would benefit from policy supporting the regionally significant infrastructure that is required to support urban development. Transpower considers that this would be best achieved by amending Policy 7 as requested elsewhere in this submission.	Retain Policy 58, but amend Policy 7 to provide direction supporting the regionally significant infrastructure that is required to support urban development.
S16 Kāpiti Coast District Council	S16.043	Policy 58: Co-ordinating land use with development and operation of infrastructure -	Support in part	<p>Council supports the inclusion of clause (a) that requires new urban development to be carried out in a way that requires the development, funding, implantation and operation of infrastructure is provided for.</p> <p>However, Council notes that decisions on resource consents and changes, variations or reviews of district plans cannot require that low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be</p>	Amend Policy 58 as follows: (b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration		available prior to development occurring. Council therefore opposes clause (b) and seek it be deleted.	
S25 Carterton District Council	S25.043	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	<p>CDC supports the requirement to ensure that new development can be supported by appropriate infrastructure.</p> <p>However, the application of this policy is potentially very broad, in that it applies to all new urban development (presumably of any scale and including infill development). Clause (b) is structured in a way that implies that new development must provide low or zero carbon, multi-modal and public transport infrastructure. CDC requests amendments to clause (b) to delete these references, as they obfuscate this policy, and other policies already encourage a range of transport infrastructure.</p>	<p><i>[Note: No changes are shown in 'amendment as follows' section. Changes requested are described in 'reasons' section. Somewhat unclear how amendments would be reflected as it would change structure of provision (b)]</i></p> <p>Amend as follows: Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration</p> <p>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, require all new urban development including form, layout, location, and timing is sequenced in a way that:</p> <p>(a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and</p> <p>(b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring.</p>
S30 Porirua City Council	S30.075	Policy 58: Co-ordinating land use with	Oppose	The policy lacks the necessary precision to enable its meaningful implementation. It is unclear how this policy would be applied to many consents, especially brownfield or infill development. For instance, an applicant has no control over the operation of	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		development and operation of infrastructure - consideration		infrastructure, including public transport. This entire policy is more appropriately managed under development agreements and the development contributions policy made under the LGA.	
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.096	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Oppose in part	Many of these matters are outside the legislative control and authority of district and city councils and so this cannot be achieved. It is inappropriate for these to be directed by the RPS.	Amend policy by deleting all references to 'require'.
S49 Chorus New Zealand Limited, Spark New Zealand Trading Limited, Vodafone Spark New Zealand Trading Limited	S49.007	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	Infrastructure is critical to a successful urban development, and this is recognised in the policy. In particular, the requirement in the policy to be sequenced so that infrastructure is provided before development, is supported. The explanation that this includes three waters infrastructure and transport infrastructure that would be necessary to support the development should be widened to include all aspects of regionally significant infrastructure needed to support the development, rather than solely highlighting only two of a myriad of necessary infrastructure matters.	Amend as follows: <i>Policy 58 requires development to be sequenced such that infrastructure that is necessary to service the development will be provided before the development occurs. This includes both all regionally significant three waters infrastructure and transport infrastructure that would be necessary to support the development.</i>
S78 Beef + Lamb New Zealand Limited	S78.016	Policy 58: Co-ordinating land use with development and	Not Stated / Neutral	Accepts that the amendments to operative Policy 58 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		operation of infrastructure - consideration			
S79 South Wairarapa District Council	S79.049	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support	Critical to ensure that environmental infrastructural objectives are met and ensures community affordability.	Retain as notified
S113 Wellington Water	S113.044	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	Clause (b) should be amended to support public health outcomes	Amend clause (b) as follows: (b) all infrastructure required to serve new development, including low or zero carbon, multi modal, and public transport infrastructure and Te Mana o te Wai infrastructure , is available, or is consented, designated or programmed to be available prior to development occurring.
S115 Hutt City Council	S115.078	Policy 58: Co-ordinating land use with development and operation of infrastructure	Support in part	While we support direction on this issue to inform decisions on district plans, this type of analysis should be complete at plan-making stage and it is redundant and infeasible to reconsider the issue from scratch for each resource consent. There may be resource consents for developments not anticipated in their zone for which this type of assessment will be relevant. However, district plans that themselves implement this policy will have sufficient	Amend Policy 58 so that it does not apply to resource consents.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		re - considerati on		direction without needing to go up to the Regional Policy Statement as well.	
S118 Peka Peka Farm Limited	S118.017	Policy 58: Co-ordinating land use with developme nt and operation of infrastru ctu re - considerati on	Oppose in part	<p>Policy 58 is not consistent with Objective 6(c) and Policy 8 of the NPS-UD relating to being responsive to proposals that would bring about significant development capacity. It is not always possible to achieve all of the matters listed in Policy 58.</p> <p>The policy is internally inconsistent with proposed Policy 57(e) of the RPS which recognises that the timing and sequencing of land use and public transport may result in a period where public transport may not be practical.</p>	Delete Policy 58 or amend the policy to achieve consistency with Objective 6(c) and Policy 8 of the NPS-UD.
S119 Summerse t Group Holdings Limited	S119.006	Policy 58: Co-ordinating land use with developme nt and operation of infrastru ctu re - considerati on	Oppose in part	<p>Policy 58 is not consistent with Objective 6(c) and Policy 8 of the NPS-UD relating to being responsive to proposals that would bring about significant development capacity. It is not always possible to achieve all of the matters listed in Policy 58.</p> <p>The policy is internally inconsistent with proposed Policy 57(e) of the RPS which recognises that the timing and sequencing of land use and public transport may result in a period where public transport may not be practical.</p>	Delete Policy 58, or amend the policy to achieve consistency with Objective 6(c) and Policy 8 of the NPS-UD.
S120 The Retirement Villages Associatio n of New Zealand	S120.006	Policy 58: Co-ordinating land use with developme nt and operation of infrastru ctu re - considerati on	Oppose in part	<p>Policy 58 is not consistent with Objective 6(c) and Policy 8 of the NPS-UD relating to being responsive to proposals that would bring about significant development capacity. It is not always possible to achieve all of the matters listed in Policy 58.</p> <p>The policy is internally inconsistent with proposed Policy 57(e) of the RPS which recognises that the timing and sequencing of land use and public transport may result in a period where public transport may not be practical.</p>	Delete Policy 58, or amend the policy to achieve consistency with Objective 6(c) and Policy 8 of the NPS-UD.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S129 Waka Kotahi NZ Transport Agency	S129.028	Policy 58: Co-ordinating land use with developme nt and operation of infrastructu re - considerati on	Support in part	Supports Policy 58 as it promotes integrated transport, land use planning and multi-modal transport, but considers further clarification is required	Seek clarification of how Policy 58 will be implemented.
S134 Powerco Limited	S134.018	Policy 58: Co-ordinating land use with developme nt and operation of infrastructu re - considerati on	Oppose	<p>Interpretation of Policy 58 is that the requirement for new development to be sequenced in a way that ensures the availability of infrastructure prior to development occurring will apply in relation to electricity and gas distribution networks, which fall within the RMA definition of 'infrastructure'. This is supported as infrastructure capacity and security of supply are significant resource management issues. Intensification, urbanisation and population growth continually place demands on energy resources, in particular electricity. While investing considerable resources in forward planning to meet future demand, the layout and delivery of the network is significantly influenced by the scale and pattern of development that results from individual subdivision and development proposals. In some situations, significant infrastructure upgrades may be required to meet the demand for electricity created by new development.</p> <p>The explanation to the policy suggests that the policy will apply just to three waters infrastructure and transport infrastructure. While case law is clear that it is the objectives and policies of a planning document, rather than explanatory statements, that hold statutory weight, and does not support the wording of the explanatory statement and seeks that it be amended to avoid any suggestion that it may narrow the scope of the policy.</p> <p>For the avoidance of doubt, also seeks to amend the wording of Policy 58 to clearly acknowledge the need to</p>	<p>Amend Policy 58 and the explanatory statement to clarify that the policy applies to all infrastructure needed to support new urban development, not just three waters and transport infrastructure. This could be achieved by making changes along the following lines:</p> <p>"When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, require all new urban development including form, layout, location, and timing is sequenced in a way that:</p> <p>(a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and</p> <p>(b) all infrastructure required to serve new development, including low or zero carbon, multi modal, and public transport infrastructure, energy and telecommunications infrastructure is available, or is consented, designated or programmed to be available prior to development occurring.</p> <p>Explanation: Explanation Policy 58 requires development to be sequenced such that infrastructure that is necessary to service the development will be provided before the development occurs. This includes both three waters infrastructure, and transport infrastructure,</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				coordinate the provision of energy infrastructure with urban development.	energy and telecommunications infrastructure that would be necessary to support the development."
S137 Greater Wellington Regional Council (GWRC)	S137.035	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	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.
S140 Wellington City Council (WCC)	S140.079	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Support in part	It is unrealistic to stop all urban development until all public transport and multi-modal transport are available to serve it. Public transport, cycleways and other transport infrastructure in existing urban areas will usually be the responsibility of councils. Development should not be stopped while this is being built. For example, some high density developments along the Let's Get Wellington Moving Mass Rapid Transit corridor should be allowed while the MRT is being designed, consented and constructed. Also the policy confuses all "subdivision, use or development" and "new urban development", and the list of transport infrastructure options "low or zero carbon", "multi modal", and "public transport" overlap.	Amend with this text, or similar: When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan, for new urban development , subdivision, use or development, give particular regard to its layout, location and sequencing so require all new urban development including form, layout, location, and timing is sequenced in a way that: (a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and (b) the development is integrated with planned or constructed transport infrastructure for low or zero carbon modes and public transport. (b) all infrastructure required to serve new development, including low or zero carbon, multi-modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					development occurring.
S148 Wellington International Airport Ltd (WIAL)	S148.053	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Oppose	WIAL submits that this policy sets an unduly onerous threshold in that it requires all new urban development to ensure it has all the infrastructure required to serve such development, including that low or zero carbon and public transportation infrastructure is available prior to the development occurring. While it is not clear if this policy would apply to a development within the Airport area, WIAL submits that it would be inappropriate to hold up such a project if for example, there are issues with the public transportation network, which is beyond its control.	Include a clear definition of urban development in the RPS. Delete this policy.
S166 Masterton District Council	S166.040	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Not Stated / Neutral	Very important to have the necessary infrastructure there for any new subdivision and/or development. Difficult to sequence.	Policy is too specific. Should be broader to encourage a range of infrastructure.
S170 Te Rūnanga o Toa Rangatira	S170.063	Policy 58: Co-ordinating land use with development and operation of infrastructure - consideration	Not Stated / Neutral	The part of the Policy 58 that says 'ensure all new urban development including form, layout, location, and timing is sequenced in a way that...' seems to belong to the 'responsive planning' section of the RPS. Co-ordinating land use with development and operation of infrastructure is not just about transport as specified in clause (b).	Move 'ensure all new urban development including form, layout, location, and timing is sequenced in a way that...' to the 'responsive planning' section of the RPS. The provision should ensure that co-ordinating land use with development and operation of infrastructure is not just about transport as specified in clause (b).

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0102	Policy 58: Co- ordinating land use with developme nt and operation of infrastructu re - considerati on	Support in part	Ātiawa supports the overall intent of policy -that all new urban development, including supporting infrastructure occurs in a sequenced and planned manner. Although Ātiawa recognises this is administratively challenging for regional and district council to coordinate, it is important that councils actively work together to achieve well-functioning urban development. Where infrastructure is available, it should be assessed to measure if the current infrastructure can handle additional capacity (i.e. wastewater and stormwater network that is already at capacity). Ātiawa oppose development being enabled on the basis of programmed infrastructure.	Amend to require that development occurs on the basis of infrastructure provided.
S167 Taranaki Whānui	S167.0120	Policy 58: Co- ordinating land use with developme nt and operation of infrastructu re - considerati on	Support	Taranaki Whānui supports the amendments to Policy 58.	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0179	Policy 58: Co- ordinating land use with developme nt and operation of infrastructu re -	Support	Rangitāne o Wairarapa supports the content and intent of this policy.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S30 Porirua City Council	S30.076	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Oppose	This policy provides no value beyond s6(e) RMA, in fact "have particular regard" is a lower regulatory bar than "recognise and provide for". The RPS needs to provide direction at a regional level and not repeat requirements in the RMA. The explanation to the policy actually provides a level of regional guidance and direction and should be considered for inclusion within the policy.	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.094	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support	Support provisions that enable Māori to express their culture and traditions.	Retain provision as notified. Consider 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 " Consider the role of urban Māori and how they are presented within the objective and policy.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.078	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support	Generally supports the policies that need to be considered in the 'Regional form, design and function' chapter.	Retain as notified.
S115 Hutt City Council	S115.079	Policy UD.2: Enable Māori cultural and traditional	Support in part	While we support direction on this issue to inform decisions on district plans, this type of analysis should be complete at plan-making stage and it is redundant and infeasible to reconsider the issue from scratch for each resource consent. District plans that implement this policy will have adequate triggers for when more detailed assessment is required.	Amend Policy UD.2 so that it does not apply to resource consents.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		norms - considerati on			
S133 Muaūpoko Tribal Authority	S133.073	Policy UD.2: Enable Māori cultural and traditional norms - considerati on	Support in part	Supports these policies, however, requests amendment to ensure Muaūpoko is specifically recognised.	Specific recognition of Muaūpokoas having connection to Te-Whanganuia-Tara and interest in these policies.
S140 Wellington City Council (WCC)	S140.080	Policy UD.2: Enable Māori cultural and traditional norms - considerati on	Support	Support as proposed.	Retain as notified.
S147 Wellington Fish and Game Council	S147.072	Policy UD.2: Enable Māori cultural and traditional norms - considerati on	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S148 Wellington Internation al Airport Ltd (WIAL)	S148.054	Policy UD.2: Enable Māori cultural and traditional norms -	Oppose in part	WIAL is concerned that there may be some practical limitations to the ability to implement this policy, and for this reason there is uncertainty around it. It also does not make grammatical sense as currently drafted.	Amend this policy 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 adistrict plan for use or development, regard shall be had to whether there is any opportunity to supportMaori in being able to express their culture and tradition through the proposal.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			This includes recognising taonga and sites and areas of significance, awa and moana and important places where mana whenua /tangata whenua still practice mātauranga.
S163 Wairarapa Federated Farmers	S163.078	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Oppose	This is a very open-ended provision, including and especially in relation to resource consent applications.	That Policy UD.2 be deleted. Delete the FW icon.
S166 Masterton District Council	S166.061	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support	Intent of this policy has been considered as part of the Wairarapa Combined District Plan review. MDC is allowing for it as a permitted activity in appropriate zones.	Retain as notified.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0103	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support	Ātiawa supports Policy UD.2.	Retain as notified.
S167 Taranaki Whānui	S167.0121	Policy UD.2: Enable Māori cultural and	Support in part	Taranaki Whānui supports the principle of this new policy.	We seek further clarification/amendment that protects against proposed developments on land surrounding marae/urupā and other sites.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		traditional norms - consideration			
S168 Rangitāne O Wairarapa Inc	S168.0168	Policy UD.2: Enable Māori cultural and traditional norms - consideration	Support in part	Specific direction to territorial authorities is supported; however Rangitāne o Wairarapa seek that the policy wording is strengthened and a reference included to adopting Kaupapa Māori based models or frameworks that provide an opportunity for tangata whenua to help build iwi social, cultural, environmental and economic capacity, and to express their relationship with their culture, land, water, sites, wāhi tapu and other taonga.	Amend the policy 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, particular regard shall be given the ability to enable Māori to express their culture and traditions in land use and development, by as a minimum, providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and by providing opportunities for a Kaupapa Māori outcomes-based framework to be applied to future urban development" , or wording that provides similar relief.
S16 Kāpiti Coast District Council	S16.082	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose	<p>Council opposes clause (a)(iii) as it goes beyond the requirements of the NPS-UD and the RMA by preventing city and district councils from applying urban zones other than those where the Medium Density Residential Standards would be applied.</p> <p>Council notes it is not the role of the RPS to determine whether significant development capacity could be realised through other zoning, such as mixed-use zones and other centre zones. Council also notes that neither the RMA or the NPS-UD gives a regional council the power to direct district plan content to the level of the specific zones that must be applied through plan changes.</p> <p>Council sees no resource management reason for (or benefit to be gained from) this regulatory direction, and we consider that the suggested limitation on how housing may be provided for via zoning is not appropriate or useful for an RPS to specify. We</p>	Delete clause (a)(iii).

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
<p>S30 Porirua City Council</p>	<p>S30.077</p>	<p>Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration</p>	<p>Oppose</p>	<p>consider the directive approach proposed may not be viable the RMA.</p> <p>Council opposes this policy and seeks it be amended for the following reasons:</p> <ul style="list-style-type: none"> • It is unclear when the policy would apply i.e. what is meant by a change of a district plan for a development. Reference to 'plan changes' would be more consistent with Policy 8 of the RMA. • The location, design and layout of a development is something that is likely to be unknown until the time of subdivision or land use consent. A district plan provides the framework for guiding these factors. • Policy guidance is needed to help determine when a plan change area is considered to be well-connected to the existing or planned urban area. • It is inappropriate and arbitrary to limit zoning options to High density residential or Medium density residential. The most appropriate zoning for an area will be determined by a range of natural and physical factors relevant to a specific location. 	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives; and/or reword as follows:</p> <p>Policy UD.3: Responsive planning to developments plan changes that provide for significant development capacity - consideration</p> <p>When considering a change of a district plan for a an unanticipated or out of sequence development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:</p> <ul style="list-style-type: none"> (a) the location, design and layout of the proposal: (ii) contributes to establishing or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22, (iii) is well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors, (iv) for housing will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development, (b) the proposal makes a significant contribution to providing significant development capacity meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage identified in monitoring for: <ul style="list-style-type: none"> (i) a variety of housing that meets the regional, district, or local shortages of housing in relation to

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>the particular type, size, or format, (ii) business space or land of a particular size or locational type, or (iii) community, cultural, health, or educational facilities, and (iv) the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and (c) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution: (i) is of high yield relative to either the forecast demand or the identified shortfall, (ii) will be realised in a timely (i.e., rapid) manner, (iii) is likely to be taken up, and (iv) will facilitate a net increase in district-wide up-take in the short to medium term, (d) 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.</p>
<p>S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council</p>	<p>S34.095</p>	<p>Policy UD.3: Responsive planning to developments that</p>	<p>Oppose</p>	<p>Clarify that this policy relates to urban development outside of existing urban areas.</p>	<p>Amend policy to clarify that this relates to urban development only including the following amendments: "When considering a change of a district plan for an urban development in accordance with clause (d) of Policy 55, particular regard shall be given to whether</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		provide for significant development capacity - consideration			the following criteria is met: ..."
S78 Beef + Lamb New Zealand Limited	S78.017	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Not Stated / Neutral	Accepts that Proposed Policy UD.3 is required to give effect to the NPS-UD but neither supports nor opposes the provision.	Retain as notified
S115 Hutt City Council	S115.080	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>We support this direction to meet the requirements of clause 3.8(3) of the NPS-UD. However, the criteria could be improved and made more consistent with the goals of the NPS-UD:</p> <ul style="list-style-type: none"> • To better provide for non-residential development, • To recognise there may be limitations in monitoring and this should not preclude applicants from providing the assessment instead, • To avoid unnecessary assessment which is not necessary to determine if a proposal provides for significant development capacity, • To provide a standard for infrastructure provision that recognises that infrastructure capacity cannot always cleanly be assigned and limited to specific areas, and • To improve clarity 	<p>Amend Policy UD.3 as follows: "Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:</p> <p>(a) the location, design and layout of the proposal: (i) contributes to establishing or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22, (ii) is well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors (iii) where it provides for housing the proposal will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development,</p>

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>(b) the proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage otherwise identified in monitoring for:</p> <p>(i) a variety of housing that meets the a regional, district, or local shortages of housing in relation to the a particular type, size, or format, or (ii) business space or land of a particular size or locational type, or</p> <p>(iii) community, cultural, health, or educational facilities, and or</p> <p>(iv) the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and</p> <p>(c) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution:</p> <p>(i) is of high yield relative to either the forecast demand or the identified shortfall,</p> <p>(ii) will be realised in a timely (i.e., rapid) manner, and</p> <p>(iii) is likely to be taken up, and (iv) will facilitate a net increase in district wide up take in the short to medium term,</p> <p>(d) required development infrastructure can be provided effectively and efficiently for the</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>proposal, taking into account that the capacity provided by existing or committed infrastructure may already be needed for 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. ..." (See also our requested relief on definitions used in this policy)</p>
<p>S118 Peka Peka Farm Limited</p>	<p>S118.018</p>	<p>Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration</p>	<p>Support in part</p>	<p>Policy UD.3 lists a range of criteria which must be given particular regard when considering developments that provide for significant development capacity.</p> <p>Matter (a)(i) references the "characteristics and qualities of a well-functioning urban environment" as identified in Policy 55(a)(ii) and Objective 22. These matters have been addressed above.</p> <p>It is unclear what is meant by matter (c)(iv) of the policy and this matter should be clarified or deleted.</p>	<p>Amend Policy UB.3 as follows:</p> <ul style="list-style-type: none"> • Make consequential amendments that reflect the relief sought in respect of Objective 22 and Policy 55; or • Deleting the words "identified in Policy 55(a)(ii) and Objective 22" from Policy UD.3(a)(i); • Remove reference to 'high density' and 'medium density' zoning; and • Delete or clarify matter (c)(iv).
<p>S119 Summerse t Group Holdings Limited</p>	<p>S119.007</p>	<p>Policy UD.3: Responsive planning to developments that provide for significant development capacity -</p>	<p>Support in part</p>	<p>Policy UD.3 lists a range of criteria which must be given particular regard when considering developments that provide for significant development capacity.</p> <p>Matter (a)(i) references the "characteristics and qualities of a well-functioning urban environment" as identified in Policy 55(a)(ii) and Objective 22. These matters have been addressed above.</p> <p>It is unclear what is meant by matter (c)(iv) of the policy and this matter should be clarified or deleted.</p>	<p>Amend Policy UD.3 as follows:</p> <ul style="list-style-type: none"> • Make consequential amendments that reflect the relief sought in respect of Objective 22 and Policy 55 outlined above; or • Deleting the words "identified in Policy 55(a)(ii) and Objective 22" from Policy UD.3(a)(i); • Delete or clarify matter (c)(iv).

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S120 The Retirement Villages Association of New Zealand	S120.007	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>Policy UD.3 lists a range of criteria which must be given particular regard when considering developments that provide for significant development capacity.</p> <p>Matter (a)(i) references the "characteristics and qualities of a well-functioning urban environment" as identified in Policy 55(a)(ii) and Objective 22. These matters have been addressed above.</p> <p>It is unclear what is meant by matter (c)(iv) of the policy and this matter should be clarified or deleted.</p>	<p>Amend Policy UD.3 as follows:</p> <ul style="list-style-type: none"> • Make consequential amendments that reflect the relief sought in respect of Objective 22 and Policy 55 outlined above; or • Deleting the words "identified in Policy 55(a)(ii) and Objective 22" from Policy UD.3(a)(i); • Delete or clarify matter (c)(iv).
S124 KiwiRail Holdings Limited	S124.012	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>KiwiRail broadly supports the intent of Policy UD.3 to provide significant development capacity, but this needs to be carefully managed to ensure that any effects at the interface of conflicting land uses, including reverse sensitivity effects, are appropriately managed. This is critical to recognise and provide for well-functioning urban environments in accordance with the direction in the NPS-UD.</p>	<p><i>[Note: stated "Seek amendment" in original submission]</i></p> <p>New subclause under (a)</p> <p>(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.</p>
S129 Waka Kotahi NZ Transport Agency	S129.027	Policy UD.3: Responsive planning to developments that provide for significant development capacity -	Support in part	<p>Supports the general intent, but considers that this policy needs to prioritise the intensification of existing urban areas rather than enabling greenfield developments for significant development capacity.</p> <p>Seek that the wording is amended to clarify that intensification of existing urban areas ahead of greenfield developments is prioritised and responsive planning should occur where intensification is not available:</p>	<p>Amend Policy UD.3 as follows:</p> <p>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</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S133 Muaūpoko Tribal Authority	S133.074	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Supports these policies, however, requests amendment to ensure Muaūpoko is specifically recognised.	Specific recognition of Muaūpokoas having connection to Te-Whanganuia-Tara and interest in these policies.
S137 Greater Wellington Regional Council (GWRC)	S137.036	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	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.
S137 Greater Wellington Regional Council (GWRC)	S137.048	Policy UD.3: Responsive planning to developments that provide for significant development capacity -	Support in part	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

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S137 Greater Wellington Regional Council (GWRC)	S137.049	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	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;
S137 Greater Wellington Regional Council (GWRC)	S137.050	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	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 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;
S137 Greater Wellington Regional Council (GWRC)	S137.051	Policy UD.3: Responsive planning to developments that provide for significant development capacity -	Support in part	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.	Delete clause (c)(iii)

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		consideration			
S137 Greater Wellington Regional Council (GWRC)	S137.052	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<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: (iviii) will facilitate a net increase in district-wide development uptake up-take in the short to medium term;
S137 Greater Wellington Regional Council (GWRC)	S137.053	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<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.
S137 Greater Wellington Regional Council (GWRC)	S137.054	Policy UD.3: Responsive planning to developments that provide for significant development capacity -	Support in part	<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:

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S140 Wellington City Council (WCC)	S140.081	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	<p>We support this direction to meet the requirements of clause 3.8(3) of the NPS-UD. However, the criteria could be improved and made more consistent with the goals of the NPS-UD and easier to read:</p> <ul style="list-style-type: none"> • To better provide for non-residential development, • To recognise there may be limitations in monitoring and this should not preclude applicants from providing the assessment instead, • To avoid unnecessary assessment which is not necessary to determine if a proposal provides for significant development capacity, • To provide a standard for infrastructure provision that recognises that infrastructure capacity cannot always cleanly be assigned and limited to specific areas, and • To improve clarity. 	<p>Clarify and refine wording of policy; and Amend Policy UD.3 as follows:</p> <p>"Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration</p> <p>When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:</p> <p>(a) the location, design and layout of the proposal:</p> <p>(i) contributes to establishing or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22,</p> <p>(ii) is well -connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors, (iii) where it provides for housing the proposal will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development, (iii) enables medium or high density housing as part of a Centre(s) and/or Mixed Use zoning, or within walking distance of a Centre(s) and/or Mixed Use zoning.</p> <p>(b) the proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage otherwise identified in monitoring for:</p> <p>(i) a variety of housing that meets the a regional,</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>district, or local shortages shortage of housing in relation to the a particular type, size, or format, or</p> <p>(ii) business space or land of a particular size or locational type, or</p> <p>(iii) community, cultural, health, or educational facilities, and or</p> <p>(iv) the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and</p> <p>(c) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution:</p> <p>(i) is of high yield relative to either the forecast demand or the identified shortfall,</p> <p>(ii) will be realised in a timely (i.e., rapid) manner, and</p> <p>(iii) is likely to be taken up, and (iv) will facilitate a net increase in district wide up take in the short to medium term,</p> <p>(d) required development infrastructure can be provided effectively and efficiently for the proposal, taking into account that the capacity provided by existing or committed infrastructure may already be needed for 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.</p>
<p>S147 Wellington Fish and Game Council</p>	<p>S147.073</p>	<p>Policy UD.3: Responsive planning to</p>	<p>Support</p>	<p>Necessary to give effect to the NPS-FM.</p>	<p>Retain as notified.</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		developments that provide for significant development capacity - consideration			
S148 Wellington International Airport Ltd (WIAL)	S148.055	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose in part	WIAL seeks that the RPS appropriately recognises that in some situations housing developments can be appropriately constrained by the "qualifying matters" that are also set out in the National Policy Statement on Urban Development (NPS-UD) and recognised in sections 77I and 77 of the RMA.	Amend the policy to include (or with similar effect): (a) (iv) avoids adverse reverse sensitivity effects on the operation and safety of regionally significant infrastructure.
S154 Investore Property Limited	S154.010	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose in part	Policy UD.3 will not give effect to the NPS-UD.	Amend Policy UD.3 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S155 Stride Investment Management Limited	S155.012	Policy UD.3: Responsive planning to	Oppose in part	Policy UD.3 will not give effect to the NPS-UD.	Amend Policy UD.3 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		developments that provide for significant development capacity - consideration			
S158 Kāinga Ora Homes and Communities	S158.002	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Consequential to submission point 1, seek that Policy UD.3 within Chapter 4.2 is retained and amended as sought by this submission and relocated to Chapter 4.1.	Retain Policy UD.3 as amended within the relief sought in this submission and relocate to Chapter 4.1.
S158 Kāinga Ora Homes and Communities	S158.029	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support in part	Supports Policy UD.3 but seeks additions to strengthen unanticipated or out of sequence developments. Seeks that the policy also includes the need to prioritise intensification within existing urban environments prior to considering urban expansion via greenfield development.	Amend Policy UD.3 as follows: When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met: a) The development is not inconsistent with the Council's strategic outcomes as set out in any Future Development Strategy, or development framework / strategy that describes where and how future urban development should occur, should the Future Development Strategy not yet be released. This includes the prioritisation of intensification of existing urban areas. b) the location, design and layout of the proposal: i. contributes to establishing or maintaining the

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22, ii. well connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors,</p> <p>ii. is well connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors and/or have access to existing or planned rapid transit stops; and / or</p> <p>iii. provides for resilience to the effects of climate change and support reductions in greenhouse gas emissions. iv. for housing will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development,</p> <p>c) The development would add significantly to meeting a demonstrated need or shortfall for housing or business floor space, as the proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage identified in monitoring for:</p> <p>i. a variety of housing that meets the regional, district, or local shortages of housing in relation to the particular type, size, or format a variety of homes that meet the needs of different households in terms of type, configuration, price, and/or location;</p> <p>ii. a variety of homes that enable Māori to express their cultural traditions and norms;</p> <p>iii. business space or land of a particular size or locational type, or</p> <p>iv. community, cultural, health, or educational</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>facilities, and</p> <p>v. the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and</p> <p>d) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution:</p> <p>i. is of high yield relative to either the forecast demand or the identified shortfall, ii. will be realised in a timely (i.e., rapid) manner, iii. is likely to be taken up, and iv. will facilitate a net increase in district wide up take in the short to medium term, ii. will likely be realised in a manner earlier than the anticipated land release sequence; and /or iii. supports, and limits as much as possible adverse impacts on, the competitive operation of land and development markets.</p> <p>e) 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.</p>
<p>S165 Royal Forest and Bird Protection Society of New Zealand</p>	<p>S165.079</p>	<p>Policy UD.3: Responsive planning to developments that provide for</p>	<p>Support in part</p>	<p>The matters under Policy 55(a)(ii) should to be applied not had particular regard to.</p>	<p>Amend Policy UD.2 to ensure that the requirements in Policy 55(a)(ii) are required to be applied, not matters to which particular regard has to be had.</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Inc. (Forest & Bird)		significant development capacity - consideration			
S170 Te Rūnanga o Toa Rangatira	S170.058	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Not Stated / Neutral	<p>Policy UD.3 Marae and papakāinga - consideration</p> <p>The consideration of this policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi. Some of these lands that are returned to Tangata Whenua, iwi would have a raft of different values associated to the whenua and the values will be dynamic -can change over time. Urban Development provisions need to recognise these values and that recognise they will play out differently in different sites.</p> <p>Marae and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications. This may need to extend to other taonga and sites and areas of significance, awa and moana and important places where iwi still practice cultural matāuranga.</p>	<p>This policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi.</p> <p>Urban Development provisions need to recognise these values, that they can change over time and that recognise they will play out differently in different sites.</p> <p>Marae and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications.</p> <p>This may need to extend to other taonga and sites and areas of significance, awa and moana and important places where iwi still practice cultural matāuranga.</p>
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0104	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Oppose in part	<p>While Ātiawa is supportive of providing for urban development in a strategic and sequenced way, in accordance with mana whenua values, Ātiawa is concerned that responsiveness planning conflicts with the principles of a well-functioning urban development, in particular coordinating and planning for development (including supporting infrastructure). In addition, Ātiawa seek that mana whenua values are recognised and provided for during responsiveness planning for developments under Policy UD.3.</p>	<p>Include new subclause:(e) the proposal shall recognise and provide for mana whenua values, including their culture, ancestral lands, water, sites, wāhi tapu and other taonga.</p>
S167 Taranaki Whānui	S167.0122	Policy UD.3: Responsive	Support	<p>We note the new policy provides for responsive planning as required by the NPS-UD by introducing</p>	<p>Retain as notified.</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.2: Matters to be considered

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		e planning to developments that provide for significant development capacity - consideration		criteria for considering developments that add significantly to development capacity.	
S168 Rangitāne O Wairarapa Inc	S168.0169	Policy UD.3: Responsive planning to developments that provide for significant development capacity - consideration	Support	Rangitāne o Wairarapa support the inclusion of cultural and health facilities in Clause (b)(iii) and assessing a proposal's contribution to affordable housing in Clause (b)(iv).	Retain as notified.