

BEFORE THE FRESHWATER HEARING PANEL OF GREATER  
WELLINGTON REGIONAL COUNCIL

**IN THE MATTER OF**           the Resource Management Act 1991

**AND**

**IN THE MATTER OF**           Proposed Plan Change 1 to the Regional Policy  
Statement for the Wellington Region (Hearing Stream 2)

---

**STATEMENT OF EVIDENCE BY CLAIRE HUNTER**

30 JUNE 2023

---

## **INTRODUCTION**

### **QUALIFICATIONS AND EXPERIENCE**

- 1 My full name is Claire Elizabeth Hunter. I am a resource management consultant and Director of Mitchell Daysh Limited, a nation-wide resource management and environmental planning consultancy firm. I have over 18 years' experience in this field. I hold a first-class Honours degree in Environmental Management from the University of Otago. I am a member of the Resource Management Law Association and an Associate Member of the New Zealand Planning Institute.
- 2 An outline of the projects in which I have been called upon to provide resource management planning advice in recent times is included in **Appendix A**. My firm has significant experience in the airport planning space, and my experience includes providing advice to both Queenstown Airport and Wellington Airport on both district and regional plan reviews, private plan changes, notices of requirements and resource consents.
- 3 I have assisted Wellington International Airport Limited (**WIAL**) with planning matters for more than a decade. I am therefore familiar with and have visited the Airport and the areas surrounding the Airport on numerous occasions.

### **CODE OF CONDUCT STATEMENT**

- 4 While this is not an Environment Court hearing, I nonetheless confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I agree to comply with the Code and I am satisfied that the matters which I address in my evidence are within my field of expertise. I am not aware of any material facts that I have omitted which might alter or detract from the opinions I express in my evidence.

### **SCOPE OF EVIDENCE**

- 5 This statement of evidence relates to Hearing Stream 2 (Overarching issues and Integrated Management) for proposed Plan Change 1 (**PC1**) to the Regional Policy Statement for the Wellington Region (**RPS**).

- 6 Wellington Regional Council (**Council**) has allocated the topics in Hearing Stream 2 to the Freshwater Planning Process in accordance with section 80A of the Resource Management Act 1991 (**the Act** or **the RMA**). WIAL submitted on provisions under consideration in this hearing stream<sup>1</sup>.
- 7 In this statement of evidence, I will:
- a. Provide my recommendations on the position expressed in the s42A report on most of the provisions WIAL submitted on; and
  - b. Explain my procedural concern about the allocation of the provisions to the Freshwater Planning Process (**FPP**).

#### **REGION-WIDE ISSUES FOR REGIONALLY SIGNIFICANT INFRASTRUCTURE**

- 8 PC1 proposes three overarching resource management issues for the Wellington Region, as RMI 1 (Adverse impacts on natural environments and communities), RMI 2 (Increasing pressure on housing and infrastructure capacity) and RMI 3 (Lack of mana whenua / tangata whenua involvement in decision making).
- 9 WIAL's submission<sup>2</sup> on the proposed overarching resource management issues noted that:
- Key infrastructure assets in the region are vulnerable to the effects of climate change.
  - Therefore, the new overarching regional issues should recognise that infrastructure providers will need flexibility to accommodate new technology, respond and adapt to climate change-related issues.
  - Maintaining the functionality, integrity and adaptability of infrastructure will be key to achieving community resilience to the challenges of climate change and this needs to be adequately recognised.
- 10 The s42A report at [73] allocated this submission point to RMI 2 (Increasing pressure on housing and infrastructure capacity), even though WIAL's

---

<sup>1</sup> Submission points S148.012, S148.013 and S148.014.

<sup>2</sup> Submission point no. S148.012.

submission is not limited in this way. It goes on at [82] to say that RMI 2 focuses on addressing the housing supply/choice and well-functioning urban environments requirements of the National Policy Statement for Urban Development, rather than on infrastructure management issues more broadly.

11 The s42A report rejects the relief sought by WIAL because “*there are objectives in the RPS, such as Objective 10, which specifically relate to regionally significant infrastructure. Objective 10 is supported by policies that specify how regionally significant infrastructure should be recognised and provided for*”.<sup>3</sup>

12 Objective 10 requires recognition of the benefits of regionally significant infrastructure, and its protection from incompatible activities:

**Objective 10** *The social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected.*

13 Policies 7 and 8 require the benefits and protection of infrastructure to be recognised in regional and district plans:

**Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans**

*District and regional plans shall include policies and/or methods that recognise:*

(a) *the social, economic, cultural and environmental benefits of regionally significant infrastructure including:*

(i) *people and goods can travel to, from and around the region efficiently and safely;*

(ii) *public health and safety is maintained through the provision of essential services:*

- *supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;*

(iii) *people have access to energy so as to meet their needs; and*

---

<sup>3</sup> S42A report, paragraph 83.

- (iv) *people have access to telecommunication services.*
- (b) *the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:*
  - (i) *security of supply and diversification of our energy sources;*
  - (ii) *reducing dependency on imported energy resources; and*
  - (iii) *reducing greenhouse gas emissions.*

***Policy 8: Protecting regionally significant infrastructure – regional and district plans***

*District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible new subdivision, use and development occurring under, over, or adjacent to the infrastructure.*

- 14 Policy 39 requires “particular regard” to be had to the benefits and protection of infrastructure in application and plan review processes:

***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; 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 and marine renewable energy resources within the region.*

- 15 In my view, the reporting officer has missed the point of WIAL’s submission, as none of these existing provisions relate to the question of climate change effects on regionally significant infrastructure. Nor do they contemplate how

infrastructure providers will adapt over time to climate change-related issues.

- 16 Infrastructure planning and delivery occurs over decades and once it is built, regionally significant infrastructure has a very long lifespan. It is therefore important, in my opinion, that the PC1 provisions recognise that climate change adaptation measures by infrastructure providers will only occur **over time**, and that the adaption will significantly, if not primarily, be driven by separate legislation to the Resource Management Act 1991.
- 17 It is also worth noting that issue RMI2 as currently drafted, and as proposed to be amended by the reporting officer, only responds to the pressure on housing supply. It does not deal with the stated issue of increasing pressure on infrastructure capacity, which is a different matter in my view.
- 18 In my opinion, this matter is of sufficient importance to be expressly referred to as part of the overarching issues for the region and will enable a better integration of the related issues and consequent plan provisions.
- 19 I consider that a minor amendment to add the words “infrastructure (including regionally significant infrastructure)” after “communities” in the s42A-recommended text of RMI1 (as shown below), is necessary to inform PC1’s cascade of proposed objectives and policies about the management of climate change effects (to be discussed in future hearings):

***Overarching Resource Management Issue 1***

***Adverse impacts on natural environments and communities***

*Inappropriate and poorly managed use and development of the environment, including both urban and rural use and development, have damaged and continue to impact the natural environment, and contribute to an increase in greenhouse gas emissions. It has also contributed to ongoing ecosystem loss and degraded water quality. This has adversely impacted the relationship between mana whenua/tangata whenua and the taiao, and is leaving communities, infrastructure (including regionally significant infrastructure), and nature increasingly exposed to the impacts of climate change.*

- 20 Notwithstanding the above amendment to RMI1, the overarching regional issues statements still fail to recognise that the providers of regionally significant infrastructure will need to pre-empt, and react to, the adverse effects of climate change.
- 21 The RPS does not address this matter in the operative provisions. Objective 10 and policies 7, 8 and 39 recognise the benefits of regionally significant infrastructure and provide for its protection from incompatible activities. Objectives 19 and 21 and policies 29 and 51 seek to minimise the exposure of activities (including infrastructure) to natural hazard risks.
- 22 The proposed PC1 climate change objectives and policies (to be discussed in a later hearing) also do not address this matter.
- 23 In my view, this is a significant issue for the region, because if infrastructure is compromised by the effects of climate change, the wellbeing of people and communities will also be compromised. I recommend that the overarching regional issues statements be amended by the addition of a fourth overarching regional issues statement ‘RMI4’ as set out below. This is intended to provide a basis for objectives and policies addressing infrastructure management in relation to climate change effects – a matter that can be discussed in evidence for the forthcoming hearing on the proposed climate change chapter.

Overarching Resource Management Issue 4

Flexible planning frameworks are needed to support key infrastructure providers to manage the impacts of climate change on infrastructure, including regionally significant infrastructure. In the absence of suitable planning frameworks, the impacts of climate change on infrastructure may adversely affect the well-being of the region’s people and communities and the functioning of the region.

**POLICY IM.2: EQUITY AND INCLUSIVENESS**

- 24 WIAL’s submission on Policy IM.2 sought that the policy be deleted due to its ambiguous, confusing language and lack of alignment with the statutory framework of the Act.

- 25 Paragraphs [170] to [173] of the s42A report summarise the numerous shortcomings in the notified version of this policy.
- 26 In my opinion, the amendments recommended in the s42A report at [179] do not satisfactorily resolve the problems with Policy IM.2. Some issues I perceive with the policy are as follows:

- It is inherent in the Local Government Act 2002<sup>4</sup> that regional and territorial authorities must manage their regulatory functions equitably. In my view there is no resource management basis for reiterating this approach in the RPS.
- IM.2 appears to seek to duplicate directions about urban development planning and delivery from the National Policy Statement on Urban Development 2020 (**NPSUD**), including:
  - Objectives 1, 4 and 5 and policies 1 and 9 of the NPSUD relating to the realisation of well-functioning urban environments that enable social, economic, and cultural wellbeing;
  - That Future Development Strategies developed under NPSUD subpart 4 must be informed by (*inter alia*) the values and aspirations of tangata whenua for urban development; and
  - That NPSUD Objective 8 and Policy 1(e) and (f) require urban environments to support greenhouse gas emissions reductions and adaptation to the effects of climate change.

However, it does so in a manner that puts a slant on these directions requiring an equitable approach which is not explicit within these national directions.

- The imperative at Policy IM.2(c) about “...recognising the need to act now to avoid more costly mitigation and adaption responses for future generations” is vague and its implementation in a consenting, notice of requirement or plan-change process may conflict with a progressive

---

<sup>4</sup> E.g., the purpose of local government at s10(10)(b) and the principles for decision making and consultation by local government at Part 6.



approach towards emissions reductions that is the focus of non-RMA legislation – such as staged adaptation by infrastructure providers to emissions reductions frameworks set at a national level.

- Policy IM.2 is also intended to implement Objective A.<sup>5</sup> However, in my reading of the provisions, Objective A does not include an outcome that relates to the directions promoted by Policy IM.2. Rather, Policy IM.2 appears to substantially differ to, and go well beyond, any of the outcomes specified in Objective A.

27 I do not see how Policy IM.2 would assist any consenting, notice of requirement or plan change process. I consider its ambiguity to be detrimental to the efficiency and effectiveness of the RPS. I disagree with the s42A report recommendation to retain this policy. I recommend that it be deleted.

#### **PROCEDURAL MATTERS - FRESHWATER PLANNING PROCESS**

28 WIAL's submission at [4.33] outlined its view that some PC1 provisions being progressed via the FPP pathway "*...are either not related to freshwater resources at all or relate to matters which may have some interaction or interplay with freshwater resources but are focused on outcomes that are much broader*".

29 The General Submissions s42A report prepared for the first PC1 hearing stream discusses, at [99] to [109], Council's process in allocating provisions to either the FPP stream or the P1S1 stream. At [103] of that General Submissions s42A report, the criteria Council used to allocate provisions to the FPP process are identified as follows:

- Whether the provision is directly related to the maintenance or enhancement of freshwater quality or quantity.
- Whether the provision is directly related to matters that will impact on the quality and quantity of freshwater, including groundwater, lakes, rivers and wetlands.

---

<sup>5</sup> The s42A report at [171] confirms that this is the intent of IM.2.

- Whether the provision gives effect to the freshwater quality or quantity parts of the NPS-FM.
- 30 I have re-reviewed Table E-3 of the s32 report, the notified text, and amended text recommended by the s42A report against the above criteria with respect to RMI1 to RMI3, and Policy IM.2.
- 31 Having done so, I remain of the opinion that these provisions belong in the P1S1 pathway, for the reasons below.
- 32 Table E-3 justifies inclusion of proposed issues RMI1 and RMI2 in the FPP on grounds that these provisions “discuss” water degradation and pressure on natural environments. The inclusion of RMI3 in the FPP pathway is premised on mana whenua decision-making and values being “largely” focused on freshwater matters.
- 33 In my view, the s32 justification does not identify a direct relationship between the any of the three issues statements and freshwater management. RMI1 refers to water degradation in the context of a wide range of environmental issues. Neither of RMI2 or RMI3 mention freshwater management at all. That high level provisions such as the issues statements can be allocated to the FPP stream by way of tenuous inferences, is, in my view, directly at odds with the criteria the Council specified in its s32 assessment.
- 34 The s32 justification provided for including Policy IM.2 in the FPP was that in seeking that environmental “issues” are not to be “exacerbated” at sub-clause (c), the policy relates to protecting and enhancing water quality and quantity. I consider this reasoning to be extremely tenuous, particularly given it arises from a single, very vague sub-clause of the policy. Furthermore, the s42A report recommends fully replacing the text of IM.2(c), which would remove even the remote link that Council has relied on.
- 35 As such, if my recommendation that the entire policy be deleted is not accepted, I consider that IM.2 does not meet the Council’s own criteria for inclusion in the FPP process and should be re-allocated.

36 Given the above, it is my view that s80A(3)(b) requires the above PC1 provisions to be considered in accordance with Part 1 of Schedule 1 of the Act.

**Claire Hunter**

**30 June 2023**

## **APPENDIX A**

### **Summary of Recent Experience of Claire Hunter**

- Fortescue Future Industries – Southern Green Hydrogen Plant – Advice on the feasibility of a site for a hydrogen production plant.
- Willowridge Developments Limited – prepared and presented evidence in the Environment Court for an earthworks plan change being proposed by the Otago Regional Council, which sought to only impose limits on earthworks on residential sites.
- Bathurst Resources Limited, Canterbury Coal Mine – Assisted in the peer review of current applications and process and provided advice in terms of strategy going forward. Preparation of section 92 responses to Environment Canterbury as part of the regional council consents being sought. Ongoing planning advice and liaison with regulatory authorities regarding the Canterbury Coal Mine closure plans. Preparation of additional consents and addendum Assessment of Environmental Effects. Preparation and presentation of evidence at the hearing and involvement in the Environment Court mediation that has followed.
- OceanaGold – Involved in various projects relating to OceanaGold’s Waihi and Macraes sites, including potential new development opportunities. Presented planning evidence at the Deepdell North Stage 3 hearing which was granted consent in 2020. Currently the lead planning consultant on various new developments being progressed at the Macraes site in the Waitaki District. Also advising OceanaGold on various planning issues relating to the Otago region.
- OceanaGold – Planning advice and preparation of submissions and further submissions on the Proposed Otago Regional Policy Statement 2021. Provision of planning evidence during the hearings.
- Contact Energy – Planning advice and preparation of submissions and further submissions on the Proposed Otago Regional Policy Statement 2021. Provision of planning evidence during the hearings.
- Contact Energy – Provision of advice regarding a section 128 review of conditions on its Clutha Hydro Scheme consent relating to landscape and visual amenity. Proffered revised conditions which were approved by the Otago Regional Council as being successful in addressing the issue.
- Contact Energy – Preparation of dredging consents to enable sediment removal from within the Bannokburn Inlet. Involved in consultation with key stakeholders and the Councils.

- Contact Energy – Providing strategic and planning advice to Contact Energy on its proposal to develop a wind farm in Southland (current 2023).
- Alliance Group Limited – Planning advice and preparation of applications with regard to the renewal of key discharge consents (water, land and air) for its Lorneville Plant.
- Alliance Group Limited – Review of Canterbury Proposed Regional Air Plan, preparation of submission and evidence.
- Alliance Group Limited – Review of various Southland Regional and District Plan changes and preparation of submissions. Participation in Environment Court mediation to resolve Alliance Group Limited’s appeal on the Southland Proposed District Plan.
- Alliance Group Limited – Preparation of resource consent application for the renewal of its Matura Plant’s hydroelectric power scheme.
- Alliance Group Limited – Preparation of statutory assessment to accompany resource consent application to renew its Pukeuri Plant biosolids discharge consent.
- Aurora Energy Limited – Successfully obtained a resource consent and subdivision for a new large-scale substation in Camp Hill, Hawea. Claire’s involvement in this project followed an earlier application which was declined by Hearing Commissioners due to its controversial location in Hawea.
- Wellington International Airport Limited – Management of technical inputs and reports for the proposed runway extension, preparation of regional and district council resource consent applications.
- Wellington International Airport Limited – Preparation of advice and submissions on the Greater Wellington Proposed Natural Resources Plan. Active involvement in preparing evidence for the various hearing streams on behalf of Wellington International Airport Limited.
- Wellington International Airport Limited – Lead author of the main site and eastern site notice of requirements.
- Wellington International Airport Limited – Provision of planning advice and preparation of submissions and further submissions on Plan Change 1 to the Wellington Regional Policy Statement.
- Liquigas Limited – Preparation of submissions and planning evidence on the Second-Generation Dunedin City Plan in order to protect the existing and proposed operational capacity of its LPG Terminal in Dunedin.

- Liquigas Limited – Reconsenting of its significant South Island LPG Terminal located at Port Otago, Dunedin. The application sought to increase the storage of LPG significantly at the site and was processed as a non-notified consent.
- Environmental Protection Authority – NZTA Expressway between MacKays Crossing to Peka Peka, Kapiti Coast project; Transmission Gully project plan change and notices of requirements and resource consents – Assisting in the review and section 42A report writing for the notice of requirement and various consents required.
- Ravensdown Fertiliser Limited – Preparation of regional council resource consents (air and coastal discharges) to enable the ongoing operation of the Plant in Ravensbourne in Dunedin City. Recently engaged to re-consent the Plant in 2025.
- Queenstown Airport Corporation – Provision of resource management advice for the airport and its surrounds, in particular, the runway end safety area extension and preparation of the notice of requirement, gravel extraction applications to both regional and district councils and other alterations required to the aerodrome designation.
- LPG Association of New Zealand Limited – Preparation of evidence and hearing attendance representing the LPGA with respect to Dunedin City Council’s Plan Change 13 – Hazardous Substances, and participation in mediation to resolve LPGA appeal.
- LPG Association of New Zealand Limited – Preparation of planning evidence on the Second-Generation Dunedin City Plan.
- Invercargill Airport Limited – Preparation of plan change provisions and section 32 analysis to provide for the future growth and expansion of Invercargill Airport in the Invercargill District Plan.
- Invercargill Airport Limited – Preparation of notices of requirement to amend a number of existing designations in the Invercargill District Plan including obstacle limitation surfaces and the aerodrome.
- Southdown Holdings Ltd – Preparation of proposed conditions of consent for large scale irrigation in the Upper Waitaki catchment, Canterbury.
- Trustpower Limited – Review of Otago Regional Council Plan Change 6A and preparation of submissions and evidence at the hearing on behalf of Trustpower Limited. Participation in Environment Court mediation to resolve issues.
- Trustpower Limited – Review of Clutha District Plan Energy Generation Plan Change and preparation of submissions and evidence at the hearing on behalf of Trustpower Limited.

- Trustpower Limited – preparation of proposed conditions of consent for the Wairau Hydroelectric Power Scheme.
- Trustpower Limited – management of the necessary technical inputs, consultation and preparation of resource consents necessary to enable the ongoing operation of the Wahapo Hydroelectric Scheme on the West Coast, South Island.
- Meridian Energy Limited – Preparation of the regional and district council consents for the Proposed Project Hayes Wind Farm in Central Otago.
- Meridian Energy Limited – Preparation of the regional and district council consents for the Proposed Mokihinui Hydro Scheme on the West Coast, South Island.
- SouthPort Limited – Prepared and presented evidence on behalf of SouthPort Limited in regards to proposed plan changes to the Invercargill District Plan.

## APPENDIX B: TABLE OF RECOMMENDATIONS

Text highlighted with underlining (example) represents recommended insertions. Text highlighted with strikethrough (example) represents recommended deletions. Text in red (example) reflects s42A amendments.

Submission ID	Provision	WIAL's position	WIAL's reasons	Relief sought by WIAL	S.42A position and recommended text	C Hunter recommendation and reasons
S148.012	<p>Overview of issues:</p> <p><u>The overarching resource management issues for the Wellington Region are:</u></p> <p><u>1. Adverse impacts on natural environments and communities</u></p> <p><u>Inappropriate and poorly managed use and development of the environment, including both urban and rural activities, have damaged and continue to impact the natural environment, increase greenhouse gas emissions, destroying ecosystems, degrading water, adversely impacting the relationship between mana whenua and the taiao, and leaving communities and nature increasingly exposed to the impacts of climate change.</u></p> <p><u>2. Increasing pressure on housing and infrastructure capacity</u></p> <p><u>Population growth is putting pressure on housing and infrastructure capacity. To meet the needs of current and future populations, development will place additional pressure on the natural and built environments.</u></p> <p><u>3. Lack of mana whenua / tangata whenua involvement in decision making</u></p> <p><u>Mana whenua / tangata whenua values, Te Ao Māori and mātauranga Māori have not been given sufficient weight in decision-making, including from governance level through to the implementation. As a result, mana whenua / tangata whenua values have not been adequately provided for in</u></p>	Oppose in part	<p>Insert into the overview of issues recognition that infrastructure providers, particularly those which are nationally and regionally significant must be given sufficient flexibility to accommodate changes in technology as we move toward meeting our nation's net carbon zero 2050 commitment.</p> <p>Maintaining the functionality, integrity and adaptability of infrastructure will also be key to achieving community resilience to the challenges of climate change and this needs to be adequately recognised.</p>	Add or amend the issues statement to recognise that key infrastructure assets within the region are vulnerable to the effects of climate change and that such facilities need to be given sufficient flexibility to accommodate new technology, respond and adapt to climate related issues.	<p><b>Reject.</b></p> <p>Overview of issues:</p> <p><u>The overarching resource management issues for the Wellington Region are:</u></p> <p><u>1. Adverse impacts on natural environments and communities</u></p> <p><u>Inappropriate and poorly managed use and development of the environment, including both urban and rural <del>use and development activities</del>, have damaged and continue to impact the natural environment, <del>and contribute to an increase in</del> greenhouse gas emissions. <del>it has also contributed to ongoing ecosystem loss and degraded destroying ecosystems, degrading water, quality. This has</del> adversely impacted <del>impacting</del> the relationship between mana whenua/tangata whenua and the taiao, and <del>is</del> leaving communities and nature increasingly exposed to the impacts of climate change.</u></p> <p><u>2. Increasing pressure on housing and infrastructure capacity</u></p> <p><u>Population growth is putting pressure on housing and infrastructure capacity. To meet the needs of current and future populations, <del>there is a need to increase housing supply and choice across the region in a manner which contributes to a well-functioning urban and rural areas,</del> while managing adverse effects on</u></p>	<p>Amend as follows:</p> <p>Overview of issues:</p> <p>The overarching resource management issues for the Wellington Region are:</p> <p>1. Adverse impacts on natural environments and communities</p> <p>Inappropriate and poorly managed use and development of the environment, including both urban and rural use and development, have damaged and continue to impact the natural environment, and contribute to an increase in greenhouse gas emissions. It has also contributed to ongoing ecosystem loss and degraded water; quality. This has adversely impacted the relationship between mana whenua/tangata whenua and the taiao, and is leaving communities, infrastructure (including regionally significant infrastructure), and nature increasingly exposed to the impacts of climate change.</p> <p><i>[Remainder of provision not shown here].</i></p> <p>Add a fourth issue as follows:</p> <p><u>Overarching Resource Management Issue 4</u></p>



	<u>resource management, causing disconnection between mana whenua / tangata whenua and the environment.</u>				<u>development will place additional pressure on the natural and built environments.</u>	<u>Flexible planning frameworks are needed to support infrastructure providers to manage the impacts of climate change on infrastructure, including regionally significant infrastructure. In the absence of suitable planning frameworks, the impacts of climate change on infrastructure may adversely affect the well-being of the region's people and communities and the functioning of the region.</u>
S148.013	<p><u>Objective A: Integrated management of the region's natural and built environments is guided by Te Ao Māori and:</u></p> <p>(a) <u>incorporates mātauranga Māori; and</u></p> <p>(b) <u>recognises ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and</u></p> <p>(c) <u>protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and</u></p> <p>(d) <u>recognises the dependence of humans on a healthy natural environment; and</u></p> <p>(e) <u>recognises the role of both natural and physical resources in providing for the characteristics and qualities of wellfunctioning urban environments; and</u></p> <p>(f) <u>responds effectively to the current and future pressures of climate change, population growth and development.</u></p>	Oppose in part	The expression 'Te Ao Māori' is not defined for the purposes of Objective A and it is not clear what guidance it will provide (or require).	Either define and provide sufficient methodologies to support the intent of this objective or delete.	<p><b>Reject.</b></p> <p><u>Objective A: Integrated management of the region's natural and built environments: <del>is guided by Te Ao Māori and:</del></u></p> <p>(a) <u>is guided by Te Ao Māori</u></p> <p>(b) <u>incorporates mātauranga Māori; and</u></p> <p>(c) <u>recognises ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and</u></p> <p>(d) <u>protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and</u></p> <p>(e) <u>protects and enhances the life-supporting capacity of ecosystems; and</u></p> <p>(f) <u>recognises the dependence of humans on a healthy natural environment; and</u></p> <p>(g) <u>recognises the role of both natural and physical resources in providing for the characteristics and qualities of well-</u></p>	No further amendments required.

					functioning urban <del>and rural areas environments</del> ; and	
					(h) responds effectively to the current and future <del>effects pressures</del> of climate change, and population growth <del>and development pressures and opportunities</del> .	
S148.014	<p><u>Policy IM.2: Equity and inclusiveness - consideration</u></p> <p><u>When considering an application for a notified resource consent, 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:</u></p> <p>(a) <u>avoiding compounding historic grievances with iwi/Māori; and</u></p> <p>(b) <u>not exacerbating existing inequities, in particular but not limited to, access to public transport, amenities and housing; and</u></p> <p>(c) <u>not exacerbating environmental issues; and</u></p> <p>(d) <u>not increasing the burden on future generations.</u></p> <p><u>Explanation</u></p> <p><u>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.</u></p>	Oppose in part	WIAL considers these to be laudable goals, however it is not clear how they will be applied in a statutory sense under the framework of the Resource Management Act or realistically achievable given the terminology used. For example, “not exacerbating” is not something that is consistent with usual resource management practice and requirements.	Delete this policy.	<p><b>Reject.</b></p> <p><u>Policy IM.2: <del>Equity and inclusiveness- consideration in resource management decision-making</del></u></p> <p><u>When considering an application for a notified resource consent, notice of requirement, or a change, variation or review of a regional <del>or and</del> district plan <del>plan, Wellington Regional Council, city and district councils shall seek to particular regard shall be given to achieving the RPS objectives and policy outcomes of this RPS in an equitable and inclusive way, particularly whenby:</del></u></p> <p>(a) <u>addressing barriers and providing opportunities for mana whenua/tangata whenua to undertake use and development to support the economic and cultural well-being of their communities avoiding compounding historic grievances with iwi/Māori; and</u></p> <p>(b) <u>providing for the development of urban and rural areas to improve the <del>not exacerbating existing inequities, in particular but not limited to, access of communities to active and public transport, amenities and affordable housing and choice</del>; and</u></p> <p>(c) <u>enabling and supporting the transition of communities to a low-emissions and climate resilient region, including recognising the need to act now to</u></p>	Delete this policy.

---

avoid more costly mitigation and adaption responses for future generations. not exacerbating environmental issues; and

(d) not increasing the burden on future generations.

Explanation

This policy requires that equity and inclusiveness are at the forefront of resource management and decision making, particularly when making decisions that affect the economic and cultural well-being of mana whenua/tangata whenua, the development of rural and urban areas, and the transition to a low-emissions and climate resilient region. to prevent any increase in existing inequities, to ensure intergenerational equity, and to improve the overall wellbeing of people and communities.

---

DRAFT