



greater WELLINGTON
REGIONAL COUNCIL

Staff Report: Proposed Regional Policy Statement for the Wellington region 2009

Volume 1

Includes submission summaries, discussion and staff recommendations on submissions on the proposed Regional Policy Statement from chapter 1 through to policy 19.

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1. Introduction

Greater Wellington Regional Council's proposed Regional Policy Statement for the Wellington region 2009 followed a lengthy review of the existing document and significant work in collaboration with the other councils in the Wellington region. The closing date for submissions on the document with Greater Wellington Regional Council was Monday 25 May 2009. On 11 July 2009 Greater Wellington publicly notified a summary of submissions received and on Friday 7 August 2009 further submissions closed.

During the submission period 144 submissions and 29 further submissions were received. The submissions addressed a large number of matters in the proposed Regional Policy Statement. This document is the Staff Report containing recommendations made by Greater Wellington staff to the Hearing Committee on the submissions received on the proposed Regional Policy Statement.

The submissions and further submissions on the proposed Regional Policy Statement have been assessed by Greater Wellington staff having regard to:

- The proposed Regional Policy Statement
- Section 32 Report
- Technical advice
- Resource Management Act responsibilities
- Case law

Greater Wellington staff sought advice from technical advisors as appropriate. The recommendations on submissions do not have any statutory weight. Instead, they are intended to assist the Hearing Committee to (a) consider the merits of the proposed Regional Policy Statement in light of submissions received and to (b) assist submitters by setting out responses to the points raised.

In reading the Staff Report, please note that subsection (b) of each topic, the 'Recommended decision', indicates whether Greater Wellington recommends that the Hearing Committee either "accept", "reject" or "accept in part" the submissions made. Accept in part means the recommendation is to accept only part of the decision requested in that submission. As noted at the end of each subsection (b), where the primary submission has been accepted it follows that any further submissions supporting the primary submission have been accepted, and the further submissions opposing the primary submitter have been rejected.

1.1 Structure of Report

The 'Staff Report: Proposed Regional Policy Statement for the Wellington region 2009' is structured as follows:

Chapter 1. Introduction

This chapter contains the introductory text. Section 1.1 outlines the structure of this report. Section 1.2 outlines the decision making process for the Regional Policy Statement from here. Section 1.3 includes a table with each submission number allocated to a submitter, their name, and the section(s) in this report that responds to their submission points. Section 1.4 includes a table with each further submission number allocated to a further submitter, their name, and the section(s) in this report where their further submissions can be found.

Section 1.3 Example

Submission No	Submitter name	Section(s) in this Report
1	Joe Bloggs	2.1, 2.83
2	Green Company Ltd	2.85, 2.132, 2.124, 2.134 2.131, 2.202

Column One: A submission number has been allocated to each submitter and is listed in numerical order.

Column Two: Name of submitter.

Column Three: Section(s) of the report that responds to their submission points.

Section 1.4 Example

Further submission No	Submitter name	Section(s) in this Report
F1	A Company	2.1, 2.89, 2.91, 2.92
F2	A.S. Mitter	2.1, 2.35

Column One: A further submission number has been allocated to each further submitter and is listed in numerical order. All further submission numbers are prefixed with 'F'.

Column Two: Name of further submitter.

Column Three: Section(s) of the report that responds to their further submission points.

Chapter 2. Summary of submissions and recommendations by topic in the proposed Regional Policy Statement.

This chapter presents the summary of submissions and staff recommendations. The first topic is 'overall' matters (2.1), followed by topics in their order of appearance in the 'proposed Regional Policy Statement for the Wellington Region 2009'.

Each topic has been allocated a number (from 2.1 – 2.202).

Each topic is followed by:

- A table which contains a summary of every submission point made on that topic and any further submissions.
- *Subsection (a) Discussion*, where each submission is discussed by Greater Wellington staff.
- *Subsection (b) Recommended decision*, where a table shows each submitter's point and the recommendation made by Greater Wellington staff (i.e. accept, accept in part, or reject).
- *Subsection (c) Recommended changes*, where any changes to the content of the Regional Policy Statement, recommended by staff in response to the submissions, is shown.

Section 2 Example

2.1 Overall

Submitter	Submission	Summary
Joe Bloggs	1/1	Sought that the practice of water fluoridation be stopped.
F1/1	A Company	Support
F2/1	A.S. Mitter	Oppose
Green Company Ltd	2/1	Sought section 2.1 be retained.
F2/2	A.S Mitter	Support

Joe Bloggs' submitter number is 1.

This is Joe Bloggs' first submission point.

A.S. Mitter's further submitter number is 2.

This is A.S. Mitter's first further submission point.

Shaded areas indicated further submissions.

(a) Discussion

Joe Bloggs sought that the practice of water fluoridation be stopped. This submission was supported by A Company and opposed by A.S Mitter. Greater Wellington staff note the requested relief is outside the scope of the Regional Policy Statement.

Green Company Ltd sought section 2.1 be retained. This was supported by A.S Mitter. Greater Wellington staff note this support.

(b) Recommended decision

Submitter	Submission	Recommendation
Joe Bloggs	1/1	Reject
Green Company Ltd	2/1	Accept

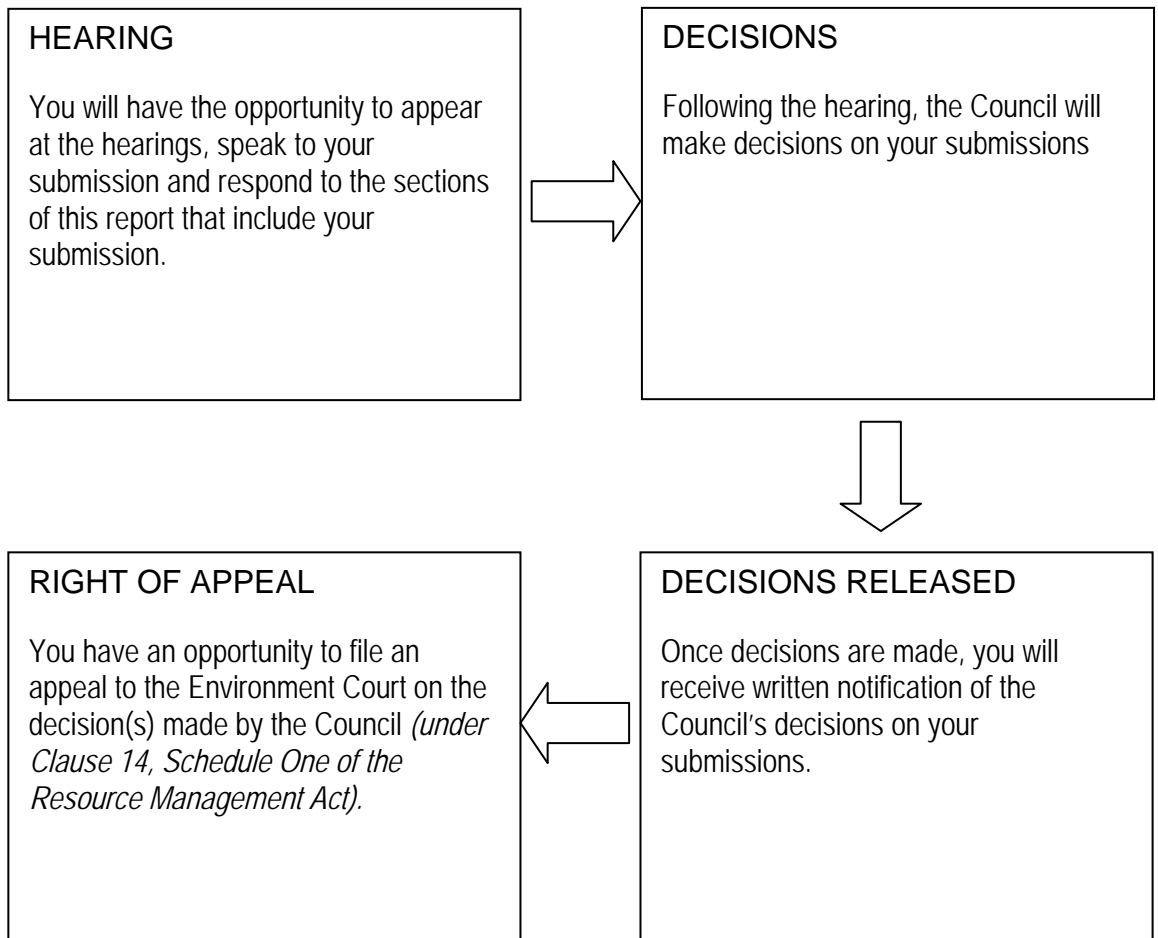
All further submissions are accepted or rejected accordingly

(c) Recommended changes

There are no recommended changes to section 2.1 in response to the submissions received.

1.2 Process from here

This Staff Report has been written to assist the Hearing Committee in the decision making process. The process for the decision making is set out below for your information:



1.3 Table with submitter number, name, and section(s) in this report to which their submission points have been responded to

Submission No	Submitter name	Section(s) in this report
1	Lucy Adams	2.104, 2.147
2	Agenda Development Planning	2.80, 2.81, 2.83, 2.84, 2.102, 2.104, 2.129, 2.131, 2.134, 2.202,
3	Aggregate and Quarry Association of New Zealand	2.66, 2.69, 2.72, 2.74, 2.75, 2.97, 2.99, 2.129, 2.135, 2.177
4	Airways Corporation of New Zealand Ltd	2.15, 2.32, 2.76, 2.80, 2.81, 2.113
5	John and Margaret Ankcorn	2.104, 2.147
6	Dana Arcus	2.104, 2.147
7	Peter Laurence Arcus	2.104, 2.147
8	Maree Atkinson	2.104, 2.147
9	Maggie Bannatyne	2.104, 2.147
10	Catherine Barron	2.104, 2.147
11	Regan Bentley	2.104, 2.147
12	David Charles Billmore	2.104, 2.147
13	James Alexander Blair	2.104, 2.147
14	Colleena June Blair	2.104, 2.147
15	Winstone Aggregates	2.1, 2.12, 2.17, 2.27, 2.29, 2.30, 2.32, 2.33, 2.34, 2.42, 2.43, 2.45, 2.46, 2.49, 2.58, 2.66, 2.69, 2.72, 2.73, 2.75, 2.76, 2.80, 2.81, 2.96, 2.97, 2.120, 2.121, 2.129, 2.130, 2.135, 2.136, 2.146, 2.196, 2.197, 2.198, 2.202
16	Helen Blundell	2.104, 2.147
17	Craig Brown	2.92, 2.119, 2.141, 2.154, 2.167, 2.178
18	Rozalie Anita Brown	2.104, 2.147
19	Edward Francis Butters	2.104, 2.147
20	George Butters	2.104, 2.147
21	Angela Calkin Goeres	2.104, 2.147
22	Cardno TCB	2.147

Submission No	Submitter name	Section(s) in this report
23	CentrePort Wellington	2.17, 2.21, 2.26, 2.34, 2.80, 2.82, 2.83, 2.107, 2.113, 2.197, 2.202
24	Coastland Shopping Limited	2.38, 2.48, 2.49, 2.103, 2.104, 2.105, 2.106, 2.129, 2.131, 2.132, 2.133, 2.143, 2.170, 2.171, 2.173
25	Anders Crofoot	2.1, 2.9, 2.17, 2.18, 2.20, 2.21, 2.77, 2.78, 2.88, 2.90, 2.94, 2.97, 2.98, 2.100, 2.101, 2.103, 2.105, 2.109, 2.110, 2.112, 2.115, 2.117, 2.124, 2.127, 2.140, 2.144, 2.145, 2.162, 2.163, 2.175, 2.176, 2.181, 2.182, 2.184, 2.188, 2.198, 2.200, 2.202
26	Crown Minerals (Ministry of Economic Development)	2.1, 2.66, 2.135, 2.150, 2.177, 2.202
27	Michael James Curtis	2.12, 2.43, 2.46, 2.49, 2.66
28	Reginald Allan Davies	2.104, 2.147
29	Liam Davies	2.104, 2.147
30	Patricia Kathleen Davies	2.104, 2.147
31	Department of Conservation	2.75, 2.76, 2.77, 2.78, 2.79, 2.80, 2.84, 2.85, 2.86, 2.87, 2.88, 2.89, 2.90, 2.91, 2.92, 2.93, 2.94, 2.95, 2.96, 2.97, 2.98, 2.99, 2.100, 2.101, 2.102, 2.104, 2.106, 2.109, 2.110, 2.111, 2.112, 2.113, 2.114, 2.115, 2.116, 2.117, 2.118, 2.119, 2.120, 2.121, 2.122, 2.123, 2.124, 2.125, 2.126, 2.127, 2.129, 2.130, 2.131, 2.132, 2.133, 2.136, 2.137, 2.140, 2.141, 2.142, 2.181, 2.182, 2.183, 2.184, 2.187, 2.188, 2.190, 2.191, 2.199, 2.200
32	Department of Corrections	2.15, 2.27, 2.58, 2.75, 2.103, 2.104, 2.129, 2.130, 2.131, 2.132
33	East Harbour Environmental Association Incorporated	2.1, 2.12, 2.17, 2.31, 2.49, 2.53, 2.58, 2.104, 2.75, 2.98, 2.100, 2.102, 2.103, 2.115, 2.116, 2.127, 2.134, 2.161, 2.197, 2.198
34	Anthony Roy Edwards	2.22, 2.94, 2.96, 2.98, 2.100, 2.102, 2.199
35	Federated Farmers of New Zealand	2.9, 2.12, 2.13, 2.15, 2.17, 2.18, 2.21, 2.22, 2.24, 2.25, 2.34, 2.35, 2.42, 2.43, 2.44, 2.45, 2.47, 2.48,

Submission No	Submitter name	Section(s) in this report
		2.50, 2.56, 2.66, 2.67, 2.68, 2.70, 2.71, 2.75, 2.76, 2.77, 2.78, 2.79, 2.85, 2.86, 2.88, 2.89, 2.90, 2.91, 2.92, 2.93, 2.94, 2.95, 2.96, 2.98, 2.99, 2.100, 2.101, 2.102, 2.109, 2.110, 2.112, 2.115, 2.123, 2.124, 2.127, 2.130, 2.134, 2.144, 2.145, 2.146, 2.161, 2.162, 2.163, 2.175, 2.176, 2.198, 2.202
36	Fonterra Co-operative Group Ltd	2.66, 2.86, 2.89, 2.90, 2.92, 2.93, 2.118, 2.134, 2.139, 2.165, 2.167
37	Foodstuffs (Wellington) Co operative Society Ltd	2.103, 2.104, 2.105, 2.128, 2.133, 2.170, 2.173
38	Friends of Owhiro Stream	2.87, 2.88, 2.91, 2.116, 2.140, 2.198
39	Noeline Gannaway	2.1, 2.7
40	Genesis Energy	2.31, 2.32, 2.58, 2.80, 2.81, 2.84, 2.94, 2.96, 2.98, 2.100, 2.113, 2.131, 2.199, 2.200
41	Liz Gibbs	2.104, 2.147
42	GNS Science	2.102, 2.125
43	Steffen Goeres	2.104, 2.147
44	Austin Grace	2.1
45	Great Harbour Way Coalition	2.1, 2.127, 2.160, 2.176
46	Greater Wellington Regional Council	2.102, 2.183, 2.187, 2.200
47	Kristina Anne Hefford	2.104, 2.147
48	Higgins Group Holdings Ltd	2.15, 2.27, 2.34, 2.69, 2.72, 2.75, 2.76, 2.135, 2.162, 2.177
49	John Christopher Horne	2.12, 2.13, 2.14, 2.19, 2.21, 2.27, 2.28, 2.34
50	Horticulture New Zealand	2.1, 2.2, 2.12, 2.15, 2.24, 2.27, 2.33, 2.34, 2.35, 2.38, 2.39, 2.40, 2.67, 2.68, 2.75, 2.76, 2.77, 2.78, 2.85, 2.86, 2.87, 2.88, 2.89, 2.90, 2.91, 2.92, 2.93, 2.102, 2.107, 2.112, 2.114, 2.115, 2.116, 2.117, 2.118, 2.119, 2.130, 2.134, 2.138, 2.141, 2.143, 2.145, 2.146, 2.147, 2.151, 2.154, 2.156, 2.159, 2.162, 2.165, 2.167, 2.172, 2.174, 2.198, 2.202

Submission No	Submitter name	Section(s) in this report
51	Linda Hoyle	2.27, 2.80, 2.113, 2.164
52	Walter Jack Hutchings	2.104, 2.147
53	Joan Elizabeth Hutson	2.104, 2.147
54	Michele Karen Johnston	2.104, 2.147
55	Kahungunu ki Wairarapa	2.1
56	Kapiti Coast District Council	2.1, 2.12, 2.17, 2.27, 2.34, 2.38, 2.41, 2.43, 2.46, 2.51, 2.54, 2.59, 2.66, 2.77, 2.78, 2.80, 2.86, 2.87, 2.88, 2.90, 2.92, 2.93, 2.96, 2.97, 2.102, 2.104, 2.110, 2.116, 2.119, 2.121, 2.125, 2.130, 2.134, 2.140, 2.141, 2.163, 2.165
57	Neville William Kean	2.104, 2.147
58	Marilyn Sally Kean	2.104, 2.147
59	Kevin Kirk	2.104, 2.147
60	Beryl Kirk	2.104, 2.147
61	Kirkcaldie and Stains Ltd	2.54
62	Kiwi Property Holdings Ltd	2.55, 2.56, 2.57, 2.58, 2.103, 2.171, 2.194
63	Sean Knight	2.104, 2.147
64	Sara Knight	2.104, 2.147
65	Korokoro Environment Group	2.26, 2.33, 2.38, 2.82, 2.84, 2.125, 2.127, 2.140, 2.143, 2.153, 2.178
66	Lower Hutt Forest and Bird Protection Society	2.1, 2.45, 2.85, 2.90, 2.96, 2.97, 2.98, 2.109, 2.114, 2.116, 2.117, 2.121, 2.125, 2.126, 2.127
67	Shona McCahon	2.98, 2.100
68	Makara Guardians Incorporated	2.31, 2.113, 2.130
69	Makara Ohariu Community Board	2.15, 2.31, 2.113, 2.130
70	Michael John Marfell-Jones	2.104, 2.147
71	Adrienne Marfell-Jones	2.104, 2.147
72	Marlborough District Council	2.10
73	John and Julie Martin	2.77, 2.78, 2.98, 2.127
74	Masterton District Council	2.12, 2.24, 2.26, 2.34, 2.45, 2.48,

Submission No	Submitter name	Section(s) in this report
		2.49, 2.76, 2.80, 2.84, 2.85, 2.89, 2.90, 2.92, 2.100, 2.101, 2.113, 2.124, 2.162, 2.172, 2.173
75	John Charles and Mary McGuinness	2.89
76	Sam McLean	2.104, 2.147
77	Isaac Hamiora McLean	2.104, 2.147
78	Ranea McLean	2.104, 2.147
79	Robert John McLellan	2.104, 2.147
80	Lynne McLellan	2.104, 2.147
81	Pamela Joy Meekings-Stewart	2.99, 2.129, 2.130, 2.143
82	Meridian Energy Limited	2.22, 2.23, 2.25, 2.27, 2.28, 2.31, 2.32, 2.34, 2.38, 2.40, 2.46, 2.48, 2.65, 2.77, 2.80, 2.81, 2.84, 2.85, 2.86, 2.90, 2.91, 2.93, 2.93, 2.96, 2.96, 2.98, 2.100, 2.102, 2.108, 2.109, 2.110, 2.113, 2.114, 2.117, 2.121, 2.123, 2.124, 2.130, 2.182, 2.186, 2.188, 2.191, 2.192, 2.195, 2.202
83	Mighty River Power	2.1, 2.3, 2.17, 2.23, 2.27, 2.31, 2.32, 2.34, 2.34, 2.36, 2.38, 2.43, 2.45, 2.46, 2.48, 2.54, 2.77, 2.78, 2.80, 2.81, 2.85, 2.86, 2.88, 2.91, 2.93, 2.96, 2.97, 2.98, 2.99, 2.101, 2.110, 2.113, 2.114, 2.115, 2.117, 2.121, 2.123, 2.124, 2.127, 2.129, 2.136, 2.157, 2.162, 2.164, 2.175, 2.200
84	Richard John Moore	2.104, 2.147
85	David Murray	2.104, 2.147
86	New Zealand Defence Force	2.12, 2.13, 2.29, 2.32, 2.75, 2.80, 2.81, 2.95, 2.107, 2.113, 2.120, 2.138, 2.202
87	New Zealand Historic Places Trust	2.17, 2.22, 2.23, 2.24, 2.26, 2.42, 2.48, 2.58, 2.60, 2.61, 2.62, 2.63, 2.64, 2.78, 2.90, 2.94, 2.95, 2.96, 2.98, 2.99, 2.100, 2.103, 2.104, 2.120, 2.122, 2.127, 2.128, 2.129, 2.142, 2.143, 2.147, 2.148, 2.150, 2.155, 2.158, 2.163, 2.168

Submission No	Submitter name	Section(s) in this report
88	New Zealand Pork Industry Board	2.11, 2.12
89	New Zealand Winegrowers	2.1, 2.134
90	Kevin Nicol	2.104, 2.147
91	NZ Transport Agency	2.2, 2.17, 2.27, 2.29, 2.54, 2.57, 2.74, 2.80, 2.81, 2.82, 2.113, 2.128, 2.129, 2.130, 2.131, 2.132, 2.133, 2.149
92	Oil Companies	2.17, 2.22, 2.23, 2.51, 2.52, 2.80, 2.81, 2.102, 2.107, 2.113, 2.167, 2.193, 2.202, 2.159
93	Robert Orriss	2.104, 2.147
94	Paraparaumu Airport Ltd	2.27
95	Pauatahanui Inlet Community Trust	2.22, 2.197, 2.200
96	Joan Margaret Perry	2.104, 2.147
97	Robert Edward Perry	2.104, 2.147
98	Chris Peterson	2.1
99	Keith James Pittams	2.104, 2.147
100	Porirua City Council	2.1, 2.17, 2.31, 2.34, 2.41, 2.43, 2.46, 2.48, 2.54, 2.58, 2.59, 2.66, 2.75, 2.77, 2.78, 2.80, 2.84, 2.89, 2.90, 2.93, 2.94, 2.95, 2.96, 2.97, 2.98, 2.99, 2.100, 2.101, 2.102, 2.103, 2.107, 2.108, 2.109, 2.116, 2.119, 2.120, 2.121, 2.127, 2.128, 2.129, 2.133, 2.140, 2.152, 2.154, 2.162, 2.165, 2.167, 2.169, 2.173, 2.175, 2.176, 2.195, 2.201, 2.202
101	Preserve Pauatahanui Incorporated	2.27, 2.28, 2.80, 2.113, 2.147, 2.164
102	June Ralston	2.104, 2.147
103	Sarah Ratana	2.104, 2.147
104	Ravensdown Fertiliser Co-operative Limited	2.48, 2.58, 2.72, 2.75, 2.135, 2.167, 2.175, 2.177
105	Regional Public Health	2.75, 2.85, 2.180, 2.202
106	Mary Teresa Roberts	2.104, 2.147
107	Scott Rose	2.104, 2.147

Submission No	Submitter name	Section(s) in this report
108	Jacqui Roy	2.104, 2.147
109	David Scott	2.34
110	Mary Helen Sheppard	2.104, 2.147
111	Robyn Smith	2.104, 2.147
112	South Wairarapa District Council	2.1, 2.5, 2.15, 2.16, 2.17, 2.23, 2.24, 2.27, 2.31, 2.34, 2.38, 2.41, 2.54, 2.59, 2.74, 2.80, 2.82, 2.87, 2.89, 2.94, 2.96, 2.98, 2.100, 2.103, 2.199, 2.202
113	Diane and Mike Strugnell	2.27, 2.46
114	Tararua Tramping Club	2.4, 2.5, 2.7, 2.11, 2.17, 2.21, 2.34, 2.43, 2.45, 2.46, 2.76, 2.77, 2.99, 2.101, 2.110, 2.127, 2.187
115	Robert Wilfred Teal	2.104, 2.147
116	Theresa Tetteroo	2.104, 2.147
117	The Energy Efficiency and Conservation Authority	2.4, 2.5, 2.9, 2.12, 2.17, 2.27, 2.28, 2.31, 2.32, 2.74, 2.76, 2.80, 2.81, 2.84, 2.93, 2.113, 2.127, 2.130, 2.141, 2.151, 2.153, 2.164, 2.178, 2.185, 2.186, 2.202
118	The Hutt Valley Angling Club Inc	2.90, 2.117, 2.199
119	The Hutt Valley Angling Club Inc	2.93, 2.147
120	Keith Martyn Thompson	2.104, 2.147
121	Carolina Thompson	2.104, 2.147
122	Thompson Family Trust	2.104, 2.147
123	Transpower New Zealand Limited	2.1, 2.2, 2.10, 2.17, 2.22, 2.23, 2.27, 2.42, 2.48, 2.51, 2.52, 2.54, 2.58, 2.80, 2.81, 2.100, 2.101, 2.102, 2.108, 2.113, 2.113, 2.124, 2.146, 2.147, 2.157, 2.167, 2.178, 2.186, 2.193, 2.193, 2.202
124	TrustPower Limited	2.5, 2.8, 2.17, 2.22, 2.27, 2.28, 2.29, 2.31, 2.32, 2.33, 2.37, 2.46, 2.77, 2.78, 2.80, 2.81, 2.84, 2.85, 2.88, 2.90, 2.92, 2.93, 2.96, 2.97, 2.99, 2.100, 2.102, 2.107, 2.109, 2.110, 2.111, 2.113, 2.118, 2.119, 2.121, 2.175, 2.202

Submission No	Submitter name	Section(s) in this report
125	Upper Hutt City Council	2.1, 2.51, 2.52, 2.53, 2.89, 2.102, 2.104, 2.146
126	Vector	2.1, 2.81
127	Wairarapa Regional Irrigation Trust	2.6, 2.34, 2.49, 2.66, 2.85, 2.86, 2.92, 2.118, 2.141
128	Paula Warren	2.17, 2.82, 2.83
129	Watersmart Ltd	2.89, 2.92
130	Wellington Botanical Society	2.7, 2.9, 2.43, 2.43, 2.45, 2.96, 2.121, 2.179, 2.191, 2.202
131	Wellington City Council	2.12, 2.15, 2.16, 2.17, 2.22, 2.23, 2.24, 2.25, 2.26, 2.27, 2.31, 2.32, 2.33, 2.34, 2.38, 2.39, 2.40, 2.41, 2.42, 2.43, 2.45, 2.46, 2.48, 2.49, 2.51, 2.52, 2.53, 2.54, 2.55, 2.58, 2.59, 2.60, 2.61, 2.62, 2.63, 2.64, 2.65, 2.66, 2.70, 2.71, 2.72, 2.74 - 2.138, 2.140 - 2.145, 2.151 - 2.178
132	Wellington Conservation Board	2.1, 2.2, 2.6, 2.7, 2.8, 2.146, 2.179, 2.187, 2.191
133	Wellington Fish and Game Council	2.1, 2.11, 2.12, 2.18, 2.21, 2.26, 2.27, 2.34, 2.35, 2.36, 2.37, 2.38, 2.39, 2.40, 2.41, 2.43, 2.46, 2.49, 2.54, 2.59, 2.66, 2.85, 2.91, 2.187, 2.188, 2.189, 2.199, 2.200
134	Wellington International Airport Limited	2.12, 2.17, 2.32, 2.54, 2.59, 2.80, 2.81
135	Wellington Police	2.1, 2.58, 2.103, 2.104, 2.129, 2.130
136	Wellington Residents Coalition	2.34
137	Wellington Surf Riders Club Inc	2.17
138	Westfield New Zealand Ltd	2.1, 2.8, 2.10, 2.28, 2.29, 2.30, 2.32, 2.54, 2.55, 2.56, 2.57, 2.58, 2.80, 2.81, 2.103, 2.104, 2.129, 2.131, 2.132, 2.133, 2.170, 2.171
139	Ian Peter and Anne Marie Wood	2.104, 2.147
140	Xia Zhang	2.104, 2.147
141	Shear Hard Work	2.27, 2.98, 2.101, 2.202
142	Pritchard Group Ltd	2.102

Submission No	Submitter name	Section(s) in this report
143	Julie Martin Teanor	2.104, 2.147
144	Martin & Anne Meacham	2.1

1.4 Table with further submitter number, name and section(s) in this report to which their further submissions have been responded to

Further submission No	Submitter name	Section(s) in this report
F1	Winstone Aggregates	2.1, 2.6, 2.7, 2.9, 2.12, 2.15, 2.17, 2.19, 2.22, 2.24, 2.25, 2.27, 2.32, 2.34, 2.36, 2.38, 2.43, 2.45, 2.46, 2.48, 2.54, 2.58, 2.66, 2.69, 2.72, 2.74, 2.75, 2.76, 2.77, 2.79, 2.80, 2.81, 2.88, 2.86, 2.87, 2.88, 2.90, 2.91, 2.92, 2.93, 2.96, 2.97, 2.98, 2.99, 2.109, 2.110, 2.114, 2.117, 2.118, 2.120, 2.121, 2.124, 2.127, 2.129, 2.130, 2.134, 2.140, 2.150, 2.157, 2.161, 2.181, 2.182, 2.184, 2.188, 2.197, 2.202.
F2	Craig Brown	2.89, 2.92
F3	Vector	2.29, 2.81, 2.113
F4	Transpower New Zealand Ltd	2.17, 2.27, 2.32, 2.80, 2.81, 2.90, 2.97, 2.110, 2.111, 2.202
F5	PowerCo Limited	2.2, 2.5, 2.10, 2.27, 2.32, 2.42, 2.51, 2.52, 2.54, 2.80, 2.81, 2.84, 2.90, 2.93, 2.97, 2.113, 2.132, 2.167, 2.179, 2.202
F6	Hutt City Council	2.74, 2.77, 2.78, 2.102, 2.108, 2.110
F7	Oil Companies	2.27, 2.32, 2.80, 2.81, 2.90, 2.97, 2.110, 2.111, 2.202
F8	TrustPower Limited	2.80, 2.93, 2.96, 2.102, 2.113
F9	NZ Transport Agency	2.17, 2.27
F10	Wellington Fish and Game Council	2.77, 2.89, 2.90, 2.92, 2.93, 2.94, 2.109, 2.110, 2.111, 2.114, 2.117, 2.118, 2.119, 2.124, 2.126, 2.127, 2.130, 2.181, 2.182, 2.183, 2.184, 2.187, 2.188.

Further submission No	Submitter name	Section(s) in this report
F11	Paraparaumu Airport Limited	2.12, 2.15, 2.19, 2.27, 2.32, 2.54, 2.59, 2.76, 2.80, 2.81, 2.113
F12	Kiwi Income Property Trust, Kiwi Income Properties Ltd and Kiwi Properties Management Ltd	2.1, 2.8, 2.10, 2.17, 2.31, 2.34, 2.46, 2.54, 2.56, 2.58, 2.59, 2.66, 2.75, 2.77, 2.78, 2.80, 2.84, 2.89, 2.90, 2.95, 2.96, 2.97, 2.98, 2.99, 2.100, 2.101, 2.102, 2.103, 2.104, 2.107, 2.108, 2.109, 2.116, 2.119, 2.120, 2.121, 2.127, 2.128, 2.129, 2.131, 2.132, 2.133, 2.140, 2.152, 2.162, 2.165, 2.167, 2.169, 2.173, 2.176, 2.195, 2.201
F13	Wellington International Airport Limited	2.12, 2.17, 2.19, 2.21, 2.22, 2.26, 2.27, 2.29, 2.32, 2.34, 2.46, 2.54, 2.75, 2.76, 2.80, 2.81, 2.102, 2.109, 2.113, 2.127, 2.186, 2.202.
F14	East Harbour Environmental Association Incorporated	2.17, 2.98, 2.100, 2.127
F15	Porirua City Council	2.17, 2.46, 2.75, 2.87, 2.102, 2.103, 2.107, 2.108, 2.116, 2.162
F16	Genesis Energy	2.75, 2.76, 2.77, 2.80, 2.85, 2.86, 2.88, 2.91, 2.93, 2.96, 2.98, 2.110, 2.114, 2.115, 2.123, 2.124, 2.130, 2.202
F17	Meridian Energy Limited	2.1, 2.3, 2.5, 2.10, 2.17, 2.27, 2.28, 2.31, 2.32, 2.34, 2.38, 2.43, 2.45, 2.46, 2.74, 2.96, 2.98, 2.99, 2.100, 2.101, 2.110, 2.113
F18	CentrePort Wellington	2.190, 2.202
F19	Horticulture New Zealand	2.1, 2.12, 2.17, 2.18, 2.27, 2.29, 2.34, 2.36, 2.37, 2.38, 2.42, 2.43, 2.45, 2.48, 2.54, 2.66, 2.74, 2.115, 2.118, 2.134, 2.145, 2.176, 2.200, 2.202
F20	Westfield New Zealand Limited	2.17, 2.27, 2.29, 2.49, 2.54, 2.56, 2.57, 2.58, 2.74, 2.81, 2.103, 2.104, 2.105, 2.106, 2.108
F21	Upper Hutt City Council	2.75, 2.104
F22	Anders Crofoot	2.1, 2.2, 2.5, 2.9, 2.12, 2.13, 2.15, 2.17, 2.18, 2.21, 2.22, 2.24, 2.25,

Further submission No	Submitter name	Section(s) in this report
		2.27, 2.33, 2.34, 2.35, 2.38, 2.39, 2.40, 2.42, 2.43, 2.44, 2.45, 2.47, 2.48, 2.50, 2.56, 2.66, 2.67, 2.68, 2.70, 2.71, 2.75, 2.76, 2.77, 2.78, 2.79, 2.85, 2.86, 2.87, 2.89, 2.90, 2.91, 2.92, 2.93, 2.94, 2.95, 2.96, 2.98, 2.99, 2.100, 2.101, 2.102, 2.107, 2.108, 1.110, 2.112, 2.114, 2.115, 2.116, 2.117, 2.118, 2.119, 2.123, 2.124, 2.126, 2.130, 2.134, 2.138, 2.141, 2.143, 2.145
F23	Federated Farmers of New Zealand	2.2, 2.5, 2.12, 2.15, 2.16, 2.18, 2.21, 2.22, 2.24, 2.25, 2.26, 2.27, 2.34, 2.35, 2.38, 2.42, 2.43, 2.45, 2.46, 2.48, 2.66, 2.68, 2.75, 2.76, 2.77, 2.78, 2.79, 2.85, 2.86, 2.88, 2.90, 2.91, 2.93, 2.96, 2.97, 2.98, 2.99, 2.100, 2.101, 2.102, 2.109, 2.110, 2.112, 2.115, 2.116, 2.124, 2.127, 2.134, 2.146, 2.162, 2.163, 2.198, 2.202
F24	Masterton District Council	2.1, 2.2, 2.9, 2.12, 2.16, 2.18, 2.22, 2.24, 2.25, 2.27, 2.28, 2.34, 2.35, 2.38, 2.40, 2.42, 2.43, 2.44, 2.45, 2.46, 2.47, 2.48, 2.50, 2.64, 2.74, 2.75, 2.76, 2.77, 2.78, 2.79, 2.80, 2.83, 2.85, 2.86, 2.87, 2.89, 2.90, 2.91, 2.92, 2.93, 2.95, 2.98, 2.99, 2.100, 2.101, 2.102, 2.103, 2.108, 2.109, 2.110, 2.114, 2.116, 2.117, 2.119, 2.121, 2.124, 2.141, 2.163, 2.165, 2.180, 2.181, 2.182, 2.183, 2.185, 2.187, 2.188, 2.189, 2.190, 198, 199, 2.200, 2.202
F25	New Zealand Defence Force	2.27, 2.32, 2.46, 2.75, 2.80, 2.81, 2.113, 2.186
F26	Mighty River Power	2.22, 2.25, 2.27, 2.28, 2.31, 2.32, 2.34, 2.38, 2.40, 2.48, 2.58, 2.65, 2.77, 2.80, 2.81, 2.84, 2.85, 2.90, 2.92, 2.93, 2.97, 2.98, 2.99, 2.102, 2.109, 2.113, 2.118, 2.121, 2.130, 2.164, 2.181, 2.182
F27	Lucy Adams	2.104, 2.147

2. Summary of submissions and recommendations by topic in the proposed Regional Policy Statement

2.1 Overall

Submitter	Submission	Summary
Winstone Aggregates	15/1	Sought that the Regional Policy Statement be withdrawn in its entirety. Alternatively, if the Regional Policy Statement proceeds, sought that the points of relief set out in their submission, together with other necessary consequential and supporting amendments be undertaken.
Winstone Aggregates	15/2	Sought that an adequate Section 32 analysis be undertaken that recognises the changes needed to the Regional Policy Statement sought by the submitter
Winstone Aggregates	15/3	Sought that consequential amendments and cross references throughout the Regional Policy Statement be made to reflect changes made in response to giving effect to the submitters submission. Sought that as a consequence of amendments, that appropriate changes be made to the AERs and methods to reflect the changes sought.
Anders Crofoot	25/1	Stated concerns that farming is not recognised as a legitimate and valuable land use, which may result in many policies potentially being interpreted to disallow farming.
F24/1	Masterton District Council	Support
Anders Crofoot	25/2	Stated that the Regional Policy Statement should recognise farms are managed as 'grass factories' not parks. Stated that the Regional and District Councils' concerns should be limited to making sure they are safe workplaces and their outputs are not having an adverse effect on the environment.
F24/2	Masterton District Council	Support
Anders Crofoot	25/3	Stated that the document largely fails to take into account economic wellbeing. Stated that economic wellbeing is considered in the issues and objectives for sections 3.3, 3.9, and 3.11 but should also be considered in other sections.

Submitter	Submission	Summary
F24/3	Masterton District Council	Support
Crown Minerals (Ministry of Economic Development)	26/1	Sought further relief or alternative relief as is appropriate to give effect to the relief sought by the submitter (including any consequential changes to relevant sections).
East Harbour Environmental Association Incorporated	33/1	Stated that the proposed Regional Policy Statement was generally much improved and overall much stronger and more straightforward, though still with some jargon.
East Harbour Environmental Association Incorporated	33/2	Stated concern regarding the objectives, policies, and methods being split up and discussed in different sections. Concerned that this may lead to important matters being missed.
Noeline Gannaway	39/2	Sought in order to support the life supporting capacity of ecosystems, that all aerial application of 1080 be stopped.
F22/1	Anders Crofoot	Oppose
Noeline Gannaway	39/3	Sought in the interests of public health, that the practice of water fluoridation be stopped
Austin Grace	44/1	The submitter raised the following matters: 1. Protection of land, rivers and streams 2. Support for people in communities 3. Putting youths into community employment And, asked which is more important, people or the environment?
Great Harbour Way Coalition	45/1	Sought that any existing provisions in the Regional Policy Statement that encourage the development of the Great Harbour Way be kept, or modified to further support the development of the Great Harbour Way. Stated that where other parts of the Regional Policy Statement could be amended to support the early facilitation of the public access route "Great Harbour Way", such changes were supported. Opposed any provisions that discourage the development of the Great Harbour Way.
Horticulture New Zealand	50/1	Sought reformatting of the document so that all policies and methods relating to an issue are grouped with the issue and objectives.

Submitter	Submission	Summary
F22/8	Anders Crofoot	Support
Horticulture New Zealand	50/2	Sought more guidance and description around the term Mauri and how it is proposed to apply.
F22/9	Anders Crofoot	Support
Kahungunu ki Wairarapa	55/1	Expressed concern that only 3 of the 69 policies refer to Mauri directly. Stated that two of the policies are places where you would expect to find Maori considerations (policy 47 and 48). The other is policy 15. In addition only one method makes reference. Kahungunu ki Wairarapa sought to see that other policies where Mauri is a part of the mutual benefits that Mauri is explicitly listed and recommends that Greater Wellington Regional Council widen the scope of its methodologies to include Kaupapa Maori methods amongst its staff.
Kapiti Coast District Council	56/1	Concerned that the Kapiti Coast does not receive sufficient attention from the Regional Council. Considered that research and monitoring is not adequately resourced by the Regional Council. Noted that many of the anticipated environmental outcomes include goals that are a significant step up from the current situation. These were supported but suggested more immediate interim or step goals. Supported direction of the Proposed Regional Policy Statement and the more directive and focused approach when compared with the Operative Regional Policy Statement and the layout which is structured simply and is easy for a layperson to understand. Concerned that implementing the objectives and policies will have significant resource costs for both Council and Iwi. Sought consideration being given to how Greater Wellington can help financially support these initiatives, especially Iwi management plans, along with research and monitoring. Noted that the Proposed Policy Statement timeframes associated with policies directing District Plans may need to be changed as a result of the proposed Resource Management Act 1991 Amendments.

Submitter	Submission	Summary
Lower Hutt Forest and Bird Protection Society	66/1	Stated that Regional Policy Statement was pro-development and needed to include more positive statements about enhancing the natural world such as prevention of destruction, stronger protection and restoration (see submission for more detailed statements). Requested Greater Wellington take the lead in environmental restoration and offer support in initiatives.
F1/50	Winstone Aggregates	Oppose
F24/72	Masterton District Council	Oppose
Mighty River Power	83/1	Supported in part. Sought retention of the themes throughout the Regional Policy Statement contained within the national energy policy (See submission for details).
Mighty River Power	83/2	Sought retention of the policies that provide direction for regional and district plans to include policies, methods, and rules that protect the region's natural and physical resources from inappropriate subdivision, use, and development.
F19/16	Horticulture New Zealand	Support
New Zealand Winegrowers	89/1	Noted that the Greater Wellington region, particularly Martinborough and the Wairarapa, is a wine growing region. However, the local wine industry is particularly sensitive to growth, especially rural residential development, which without proper controls, has the potential to accelerate the loss of productive soils in the region and compromise limited existing water supplies. Inappropriate development within rural areas may also raise reverse sensitivity issues, where conflict arises between the effect of existing rural activities and the expectations of new residents. Stated that it is therefore crucial that the proposed Regional Policy Statement recognises and supports the wine industry's role within the Wellington region.
Chris Peterson	98/1	Generally supported proposed Regional Policy Statement. In particular supported sentiment expressed in Chairs Forward. Sought that not too many concessions were made during the submission process

Submitter	Submission	Summary
Porirua City Council	100/1	<p>Supported the Proposed Regional Policy Statement, subject to the matters specifically raised in the submission. In particular, the following general aspects were supported:</p> <ul style="list-style-type: none"> • Strong regional directives • The inclusion of regulatory and non-regulatory policies and methods • Guidance for the application of regulatory policies • Methods that seek integrated management • The inclusion of regional form, design and function; and • The emphasis on reducing and removing the discharge of contaminants and sediment to waterways and the coastal environment.
F12/1	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
South Wairarapa District Council	112/1	<p>Supported the structure, general direction and the more focused approach compared to the operative Regional Policy Statement. Stated that provides more clarity for planners implementing the district plan. Considered the majority are being already being dealt with in their proposed Wairarapa Combined District Plan.</p>
Transpower New Zealand Limited	123/1	<p>Sought that the proposed Regional Policy Statement be amended to make changes detailed in the submission, to ensure:</p> <p>That the National Policy Statement on Electricity Transmission is given effect to;</p> <p>The sustainable management of the National Grid as a physical resource;</p> <p>Appropriate provision for the ongoing operation and maintenance of the network, including ensuring that lines can be accessed;</p> <p>That the existing network can be upgraded in order to meet growth in energy demand;</p> <p>The protection of the existing network from issues of reverse sensitivity and the effects of others' activities; and appropriate provision for the planning and development of new lines.</p>

Submitter	Submission	Summary
F17/1	Meridian Energy Limited	Support
Transpower New Zealand Limited	123/2	Sought: A. Any additions, deletions or consequential amendments necessary as a result of the matters raised in the submission. B. Adoption of any other such relief as to give effect to the submission.
Upper Hutt City Council	125/1	Supported the structure and layout of the proposed Regional Policy Statement, and acknowledged the consideration given to making the document clear and useable. Noted, in principle, support for the majority of the proposed Regional Policy Statement as notified, but submitted in detail on a limited number of aspects of the Regional Policy Statement to which it were opposed, or on aspects to which were supported.
Vector	126/1	Sought that: (a) the Proposed Regional Policy Statement be adopted subject to the specific amendments sought by the submitter, or amendments which give effect to the submitters concerns as set out in the submission ; and (b) Any other consequential amendments are made.
Wellington Conservation Board	132/1	Sought that assurance be given in the final version of the Regional Policy Statement that: <ul style="list-style-type: none"> the Council has identified likely trends in human and environmental pressures in the region in the next 10-years, its policies and methods have taken account of these, and it is ready to allocate priorities and manage their impacts where needed.
F22/2	Anders Crofoot	Support
Wellington Fish and Game Council	133/1	Supported the whole of catchment approach promoted within the Proposed Policy Statement.
Wellington Police	135/1	Sought the terms 'social infrastructure' and 'essential social services' including access to emergency services are defined and included in all relevant objectives and policies.
F1/107	Winstone Aggregates	Oppose in part

Submitter	Submission	Summary
Westfield New Zealand Ltd	138/1	Stated that the Regional Policy Statement was generally supported insofar as it promotes: (a) Integrated planning between the territorial authorities within the Region. (b) The efficient use of existing investment and infrastructure. (c) The vibrancy and viability of regionally significant centres.
F12/54	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
Martin & Anne Meacham	144/1	Sought that the submitter's private land be excluded from within the boundaries of the Regional Focus Area.

(a) Discussion

Winstone Aggregates sought that the Regional Policy Statement be withdrawn in its entirety, or alternatively requested specific changes, an adequate section 32 analysis be undertaken, and consequential changes to the Regional Policy Statement to reflect changes sought. Greater Wellington staff have made recommendations on specific submission points in the appropriate sections, but do not consider the complete withdrawal of the Regional Policy Statement necessary, and consider the section 32 analysis to be adequate.

Anders Crofoot was concerned that farming is not recognised as a legitimate land use which may lead to preventing farming activities, and considered councils should only be concerned with ensuring farms are safe workplaces and are not having adverse environmental effects. Masterton District Council supported the submission. Greater Wellington staff consider that councils have wider responsibilities under the Resource Management Act so the issues addressed in the Regional Policy Statement are appropriate. It is not intended to prevent farming from occurring within the region, and including reference to farming in the region is appropriate. Staff therefore recommend additions to the coastal environment introduction. See recommended changes to section 3.2.

Anders Crofoot also stated that economic wellbeing is largely not considered in the Regional Policy Statement and should be considered

throughout. Masterton District Council supported the submission. Greater Wellington staff consider that, while economic considerations are not specifically referred to in all sections, economic wellbeing is an overarching consideration under the Resource Management Act so must be considered in decisions, and was also considered in the section 32 reports and during the development of the Regional Policy Statement. No change is recommended.

Crown Minerals (Ministry of Economic Development) sought consequential changes as appropriate for the relief requested. Greater Wellington staff have made recommendations on specific submission points in the appropriate sections.

East Harbour Environmental Association Incorporated stated the proposed Regional Policy Statement was generally an improvement on the draft Regional Policy Statement. Greater Wellington staff note these comments.

East Harbour Environmental Association Incorporated was concerned that the separation of the objectives, policies, and methods may lead to important matters being missed. Greater Wellington staff consider all important matters are addressed in the Regional Policy Statement, so no change is necessary.

Noeline Gannaway requested that all aerial applications of 1080 and the practice of water fluoridation be stopped. Anders Crofoot opposed the submission on 1080. Greater Wellington staff note the requested relief is outside the scope of the Regional Policy Statement.

Austin Grace supported the protection of land, rivers, and streams; and requested funding and infrastructure for people on low income and youth community employment initiatives. Greater Wellington staff note the support for environmental protection. Youth employment initiatives and low income support are outside the scope of the Regional Policy Statement.

The **Great Harbour Way Coalition** supported any amendments to the Regional Policy Statement that would support the development of the Great Harbour Way, and opposed any changes that would discourage it. Greater Wellington staff note the comments and have made recommendations on specific submission points in the appropriate report sections.

Horticulture New Zealand sought reformatting of the Regional Policy Statement so that policies and methods are grouped with the relevant issues and objectives. The submission was supported by Anders Crofoot. Greater Wellington staff note that some policies and methods relate to multiple issues and objectives, so the current format and cross-referencing is appropriate.

Horticulture New Zealand also sought more guidance on the term 'mauri' and how it is to apply. The submission was supported by Anders Crofoot. The loss of mauri, particularly in relation to fresh and coastal waters, was identified as an issue of significance for the region's iwi authorities. Section 3.10 and policy 48 provide guidance on the meaning of mauri. The goal with respect to 'mauri' for the region is outlined in objective 25. The objective is implemented through policy 48 and the policies listed on page 65 alongside objective 25. The submitter should however note that Greater Wellington staff have recommended that policy 48 be amended so that the policy does not apply to resource consents and notices of requirement. This is to address concerns that the term would be difficult to determine and result in uncertainty for applicants.

Kahungunu ki Wairarapa were concerned that mauri was not referred to in many policies, and sought that mauri be included in all policies where relevant. As noted above the objective to sustain mauri is implemented through policy 48 and a number of other policies referred to at the bottom of page 65. To clarify the range of policies that are relevant to sustaining mauri in the Regional Policy Statement Greater Wellington staff recommend that objective 25 be added to the cross referencing alongside each of these policies.

Kahungunu ki Wairarapa also requested that Kaupapa Maori methods be included amongst council staff. Training for staff in order to better understand the Maori world view and improve our cultural competencies is a matter that is being addressed as part of Greater Wellington Te Reo and Tikanga Strategy.

Kapiti Coast District Council were concerned that research and monitoring is not adequately resourced and the Kapiti Coast is not considered enough by the regional council. They supported the anticipated environmental outcomes but requested interim goals be included for those with higher goals. They also supported the direction of the proposed Regional Policy Statement. They were concerned at the resource implications for councils and iwi in implementing many of the objectives and policies and requested that council consider how financial support can be given. They also noted that the impact of the Resource Management Act amendments may need to be taken into account regarding timeframes for changing district plans. Support and comments are noted. Greater Wellington has included a budget for research and monitoring and plan implementation in the Ten Year Plan. Interim goals are considered unnecessary as the interim goals would be progress towards the stated goals, which is implied already. The Regional Policy Statement has been amended as a consequence of the Resource Management Amendment Act 2009. See recommended changes and further discussion under proposed section 4.1.

Lower Hutt Forest and Bird Protection Society requested that the proposed Regional Policy Statement include more positive statements

about enhancing the natural world and be less pro-development. The Society also requested that Greater Wellington take the lead in environmental restoration and offer support in initiatives. Winstone Aggregates and Masterton District Council opposed the submission. The proposed Regional Policy Statement balances environmental protection and economic development, along with social and cultural aspects, as required by the Resource Management Act. Several policies relate to protection, maintenance, or enhancement of natural resources. Greater Wellington has a Take Care programme which runs several environmental restoration groups, and the council also provides funding incentives for wetlands and for riparian planting as part of the Streams Alive programme. No changes are recommended.

Mighty River Power sought retention of the themes relating to the national energy policy and retention of the policies directing regional and district plans to protect resources from inappropriate subdivision, use, and development. Horticulture New Zealand supported retention of the policies. Greater Wellington staff have made recommendations on specific submission points for the energy and infrastructure provisions.

New Zealand Winegrowers were concerned about reverse sensitivity impacting on the wine industry and requested the role of the wine industry in the region be recognised and supported in the proposed Regional Policy Statement. Greater Wellington staff consider that, while productivity and productive land are recognised in policies 55 and 59 and reverse sensitivity is recognised in policy 1, the potential for reverse sensitivity to impact on such existing activities should be a consideration in rural development. Staff have recommended an addition to policy 55. See recommended changes to policy 55.

Chris Peterson generally supported the proposed Regional Policy Statement and requested that not too many concessions be made. Comments are noted.

Porirua City Council supported several general aspects of the proposed Regional Policy Statement. Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd supported the submission. The support is noted.

South Wairarapa District Council supported the structure, general direction, and more focused approach of the proposed Regional Policy Statement. The support is noted.

Transpower New Zealand Limited requested changes detailed in their submission relating to the management and protection of the national electricity grid, and sought any consequential changes necessary to give effect to those requests. Meridian Energy Limited supported the submission. Greater Wellington staff have made recommendations on specific submission points in the energy and infrastructure provisions.

Upper Hutt City Council supported the structure and layout of the proposed Regional Policy Statement and supported, in principle, the majority of the proposed Regional Policy Statement, subject to detailed submissions. Support is noted. Recommendations on specific submission points are in the corresponding sections.

Vector sought the adoption of the proposed Regional Policy Statement subject to detailed submissions and any consequential changes necessary. Recommendations on specific submission points are in the corresponding sections.

The **Wellington Conservation Board** sought assurance that Council had identified the key environmental issues for the next 10 years, that these have been taken into account in the policies and methods, and priorities will be allocated and impacts managed where needed. Anders Crofoot supported the submission. Greater Wellington staff consider these assurances to be the basis of the Regional Policy Statement, and therefore consider the inclusion of issues, objectives, and policies in the Statement indication that they are the key issues and priorities for the region.

Wellington Fish and Game Council supported the whole of catchment approach. The support is noted.

The **Wellington Police** sought the terms ‘social infrastructure’ and ‘essential social services’ be defined and included in all relevant objectives and policies. Winstone Aggregates opposed the uncertainty of the requested amendments. The term ‘regionally significant infrastructure’ has been recommended to be expanded to include certain social infrastructure. Police jails are included in the definition of prisons, but police stations have not been included as these are significant on a district-wide scale, but do not service the entire region so are not regionally significant. For recommended changes see the report on definitions. Staff also note that policy 6 includes ‘the provision of essential services’ as part of the benefits of regionally significant infrastructure. Staff recommend including emergency services in the last paragraph of the explanation to policy 6, as these are essential services. See the report on policy 6 for the recommended changes.

Westfield New Zealand Ltd supported integrated planning, efficient use of existing investment and infrastructure, and vibrancy and viability of the regionally significant centres promoted in the proposed Regional Policy Statement. Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd supported the submission. The support is noted.

Martin and Anne Meacham sought that their land be excluded from within the boundaries of the Regional Focus Area, areas relating to the coastal environment, fresh water, indigenous ecosystems, and landscape. Greater Wellington staff consider it is appropriate to have

policies addressing the coastal environment, fresh water, indigenous ecosystems, and landscape over the region as a whole. No change is recommended.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/1	Reject
Winstone Aggregates	15/2	Reject
Winstone Aggregates	15/3	Accept in part
Anders Crofoot	25/1	Accept
Anders Crofoot	25/2	Accept in part
Anders Crofoot	25/3	Reject
Crown Minerals (Ministry of Economic Development)	26/1	Noted
East Harbour Environmental Association Incorporated	33/1	Accept
East Harbour Environmental Association Incorporated	33/2	Reject
Noeline Gannaway	39/2	Reject
Noeline Gannaway	39/3	Reject
Austin Grace	44/1	Accept in part
Great Harbour Way Coalition	45/1	Noted
Horticulture New Zealand	50/1	Reject
Horticulture New Zealand	50/2	Accept in part
Kahungunu ki Wairarapa	55/1	Accept in part
Kapiti Coast District Council	56/1	Accept in part
Lower Hutt Forest and Bird Protection Society	66/1	Accept in part
Mighty River Power	83/1	Noted
Mighty River Power	83/2	Noted
New Zealand Winegrowers	89/1	Accept in part
Chris Peterson	98/1	Accept
Porirua City Council	100/1	Accept
South Wairarapa District Council	112/1	Accept

Submitter	Submission	Recommendation
Transpower New Zealand Limited	123/1	Noted
Transpower New Zealand Limited	123/2	Noted
Upper Hutt City Council	125/1	Accept
Vector	126/1	Noted
Wellington Conservation Board	132/1	Reject
Wellington Fish and Game Council	133/1	Accept
Wellington Police	135/1	Accept in part
Westfield New Zealand Ltd	138/1	Accept
Martin & Anne Meacham	144/1	Reject

All further submissions are accepted or rejected accordingly.

(c) **Recommended changes**

See reports on Section 3.2 Coastal Environment and policy 55.

2.2 Chapter 1 Introduction

Submitter	Submission	Summary
Horticulture New Zealand	50/3	Sought the inclusion of a statement in Chapter One outlining the importance of rural production land activities in the Wellington Region, and directly recognise the social, economic and cultural benefits that derive from rural production activities. Support the issue statement with appropriate objectives and policies in the Regional Policy Statement.
F22/10	Anders Crofoot	Support
F24/54	Masterton District Council	Support
NZ Transport Agency	91/1	Requested that the Land Transport Management Act be added to the list of companion statutes on page 5.
F23/1	Federated Farmers of New Zealand	Support

Submitter	Submission	Summary
Transpower New Zealand Limited	123/3	Sought retention, without modification, the recognition of the National Policy Statement on Electricity Transmission in section 1.3 and the reference to National Environmental Standards on Electricity Transmission in section 1.3.
F5/1	PowerCo Limited	Support
Wellington Conservation Board	132/2	Sought a specific mention in the Regional Policy Statement of the advantages of a joint approach with Department of Conservation on biodiversity, pest and ecosystems management and a stated intention to explore this.

(a) Discussion

Horticulture New Zealand sought the inclusion of a statement, in chapter 1, on the nature of rural production land activities and its importance to the Wellington region. The submitter also sought that the additional statement be supported with appropriate objectives and policies. The submission was supported by Anders Crofoot and Masterton District Council. Greater Wellington staff consider it is not appropriate for such a statement to be inserted because, as indicated by the section headings, section 1 of the Regional Policy Statement provides introductory material on procedures, planning and connections with other processes. It does not address matters dealing directly with natural and physical resources themselves. However, a statement reflecting the importance of rural production land use activities would be more suitable in section 2.3, Community Outcomes for the Wellington Region, of the proposed Regional Policy Statement. Objectives and policies for the additional statement will not be created but the statement will qualify how rural production land use can create social, economic and cultural benefits for a region.

NZ Transport Agency sought that the Land Transport Management Act be added to the list of Resource Management Act companion statutes on page 5 of the proposed Regional Policy Statement. Federated Farmers of New Zealand supported this submission. Greater Wellington staff recommend accepting this submission.

Transpower New Zealand Limited sought retention without modification of the recognition of the National Policy Statement on Electricity Transmission in section 1.3, along with the reference to the National Environmental Standard on Electricity Transmission in section 1.3. This submission was supported by PowerCo Limited. Greater Wellington staff recommend accepting this submission.

The **Wellington Conservation Board** sought specific mention of a joint approach with the Department of Conservation on biodiversity,

pest and ecosystem management and a stated intention to explore this. Section 1.3 of the Regional Policy Statement discusses the framework behind resource management policy and planning. Here it clearly states that “there are also a number of statutes that can be thought of as companions to the Resource Management Act” as their purpose further supports the sustainable management of natural and physical resources. The submitter specifically wanted the Regional Policy Statement to identify the importance of aligning with the Department of Conservation’s Conservation Management Strategy. However, the Coastal Management Strategy is a statutory requirement of the Conservation Act, an Act which is listed as a ‘companion’ in section 1.3. Greater Wellington staff consider the inclusion of the Conservation Act as a ‘companion’ sufficient and recommend rejecting this part of the submission.

(b) Recommended decision

Submitter	Submission	Recommendation
Horticulture New Zealand	50/3	Accept in part
NZ Transport Agency	91/1	Accept
Transpower New Zealand Limited	123/3	Accept
Wellington Conservation Board	132/2	Reject

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend page 5, paragraph 1 of section 1.3 as follows:

There are also a number of statutes that can be thought of as companions of the Resource Management Act, in that their purpose can be interpreted as further supporting the sustainable management of natural and physical resources (e.g. the Conservation Act, the Reserves Act, the Local Government Act, and the Land Transport Management Act), or have some other relationship with resource management functions (e.g. the Civil Defence Emergency Management Act, the Hazardous Substances and New Organisms Act and the Biosecurity Act).

Add a new paragraph on page 10 as second to last paragraph above the heading “2.4 Integrating management of natural and physical resources” as follows:

While a large proportion of our community is in the city areas of Wellington, Porirua, Hutt, and Upper Hutt, a significant proportion is also in small townships and rural area which largely rely on rural production activities. The rural production activities

that occur in and around the rural and small township areas provide economic, social, cultural, and environmental benefits for the region as a whole, and contribute to the achievement of the community outcomes.

2.3 Section 1.1 Setting the scene

Submitter	Submission	Summary
Mighty River Power	83/3	Sought that the second to last paragraph be amended to read ‘...promoting the sustainable management of natural and physical resources. In this connection it is not appropriate to consider only those provisions addressing the adverse effects of activities, without consideration of those provisions which address the benefits of activities, and vice versa. Whether in relation to Regional and District Plan preparation, or the consideration of resource consent applications and notices of requirement, the weight to be given to competing objectives and policies must be determined on a case by case basis.’
F8/1	TrustPower Limited	Support
F17/2	Meridian Energy Limited	Support

(a) Discussion

Mighty River Power sought an addition to the end of the third paragraph of section 1.1 Setting the Scene, as follows: “...In this connection it is not appropriate to consider only those provisions addressing the adverse effects of activities, without consideration of those provisions which address the benefits of activities, and vice versa. Whether in relation to Regional and District Plan preparation, or the consideration of resource consent applications and notices of requirement, the weight to be given to competing objectives and policies must be determined on a case by case basis.” This submission was supported by TrustPower Limited and Meridian Energy Limited. Greater Wellington staff recommend the inclusion of the first part of the sought addition to clarify that it is best practice to consider both adverse and positive effects of potential activities.

(b) Recommended decision

Submitter	Submission	Recommendation
Mighty River Power	83/3	Accept in part

All further submissions are accepted in part accordingly.

(c) Recommended changes

Amend page 1, paragraph 3 of section 1.1 as follows:

This Regional Policy Statement is not simply a collection of discrete policies. The policies are intended to complement each other and provide a robust, integrated approach to promoting the sustainable management of natural and physical resources. It is not appropriate to consider only those provisions addressing the adverse effects of activities, without considering those provisions which address the benefits of activities, and vice versa.

2.4 Section 1.2 The purpose and content of the Regional Policy Statement

Submitter	Submission	Summary
Tararua Tramping Club	114/1	Stated that the Statement should be, and is, doing more than just "outlining the policies and methods required to achieve the integrated management of the region's natural and physical resources". That is not the wording the Act uses. Noted that the very next page says 62(1)(d) & (e) require the Statement to state (not just "outline") the policies and methods (excluding rules). Sought that "outlining" be replaced by "providing" or at least be deleted.
The Energy Efficiency and Conservation Authority	117/1	Sought amendments to section 1.2 to include reference to section 31 of the Resource Management Act 1991. But, stated that the Council's functions under s30 of the Resource Management Act 1991 were of particular relevance, and in particular functions under section 30(1)(gb).

(a) Discussion

The **Tararua Tramping Club** sought that the word “outlining” should be removed from the sentence “The Resource Management Act requires every regional council to prepare a regional policy statement which is designed to achieve the purpose by providing an overview of the resource management issues for the region, and outlining the policies and methods required to achieve the integrated management of the region’s natural and physical resources’. Section 62 (1)(d) and (e) of the Resource Management Act require regional policy statements to ‘state’ their methods and policies, as opposed to merely ‘outline’. Greater Wellington staff recommend accepting this submission in part, by deleting the word ‘outlining’ and replacing it with ‘stating’.

The Energy Efficiency and Conservation Authority’s submission sought amendments to section 1.2 to include reference to section 31 of the Resource Management Act 1991. However, the reasons given for

the suggested amendment imply that the submitter meant to seek an amendment to section 1.2 to include reference to section 30, in particular section 30(1)(gb), of the Resource Management Act 1991. Section 30 of the Resource Management Act 1991 sets out in detail all functions of regional councils under the Act and section 30(1)(gb) states that every regional council shall give effect to the Act by carrying out the function of *the strategic integration of infrastructure with land use through objectives, policies, and methods*.

Greater Wellington staff consider that section 1.2 of the Regional Policy Statement clearly states that the function of a regional policy statement is to achieve the purpose of the Resource Management Act - the promotion of sustainable management of natural and physical resources - by providing an overview of the resource management issues for the region and stating policies and methods required to achieve integrated management of the region's resources. Therefore, it is unnecessary to include section 30 of the Resource Management Act, or any of its subsections, in section 1.2 of the Regional Policy Statement.

(b) Recommended decision

Submitter	Submission	Recommendation
Tararua Tramping Club	114/1	Accept in part
The Energy Efficiency and Conservation Authority	117/1	Reject

(c) Recommended changes

Amend page 1, paragraph 2 of section 1.2 as follows:

The Resource Management Act requires every regional council to prepare a regional policy statement which is designed to achieve the purpose by providing an overview of the resource management issues for the region, and ~~outlining~~ stating the policies and methods required to achieve the integrated management of the region's natural and physical resources.

2.5 Section 1.3 The resource management policy and planning framework

Submitter	Submission	Summary
South Wairarapa District Council	112/2	Page 4. Last paragraph: Stated that Wellington Regional Council should be referred to as the "Greater Wellington Regional Council".

Submitter	Submission	Summary
South Wairarapa District Council	112/3	Stated that it would be useful to have a list of all the Regional Plans in the Regional Plans section - the Coastal Plan, the Soil Plan, the Freshwater Environment Plan, the Discharge to Land Plan and the Air Quality Plan.
South Wairarapa District Council	112/4	Sought that the relationship between the Regional Policy Statement and the Wellington Regional Land Transport Strategy should be stated more clearly.
Tararua Tramping Club	114/2	Sought that "of natural and physical resources" be inserted after "sustainable management" properly to reflect the purpose of the Act 5(1).
The Energy Efficiency and Conservation Authority	117/2	Sought retention of reference to the New Zealand Energy Strategy, New Zealand Energy Efficiency and Conservation Strategy and the Renewable Energy Assessment for the Wellington Region, but amendments to section 1.3 as follows: "Similarly, policies and methods within this Regional Policy Statement that relate to infrastructure and energy are drawn from the National Policy Statement on Electricity Transmission and the Proposed National Policy on Renewable Electricity Generation." "There are a number of other national strategies promulgated by central government and its agencies that are not prepared under the Resource Management Act 1991." "Documents which informed this Regional Policy Statement include the New Zealand Energy Strategy to 2050 (2007) and, the New Zealand Energy Efficiency and Conservation Strategy (2007) including the target of 90% renewable electricity by 2025"
F5/2	PowerCo Limited	Support
F8/2	TrustPower Limited	Support in part
F17/3	Meridian Energy Limited	Support in part
F23/2	Federated Farmers of New Zealand	Oppose
TrustPower Limited	124/1	Sought amendments as follows: 'Two other National Policy Statements have also been proposed. One concerns renewable electricity generation, the other is

Submitter	Submission	Summary
		about freshwater management. Both have been released for public consultation and Boards of Inquiry have been appointed to hear submissions. Consistent with the Region's significant renewable energy potential, the Regional Policy Statement seeks to provide a framework for both recognising and providing for the national benefits of renewable electricity generation activities consistent with the proposed National Policy Statement for Renewable Electricity Generation.' And consequential changes.
F22/3	Anders Crofoot	Oppose
F23/3	Federated Farmers	Oppose

(a) Discussion

South Wairarapa District Council sought to amend the name Wellington Regional Council to Greater Wellington Regional Council where it appears throughout the proposed Regional Policy Statement. Greater Wellington staff note the “Wellington Regional Council” is the statutory name for the Council, whereas the name “Greater Wellington” is a brand name. The Regional Policy Statement is a statutory document and it is appropriate to refer to the council’s statutory name in it. It is not recommended this submission is accepted.

The South Wairarapa District Council also sought to include a list of all regional plans under the Regional Plans heading in section 1.2. Greater Wellington staff note there are currently five regional plans. These are due for review commencing in December 2009 and one replacement plan is being considered. Regional plans have to give effect to the Regional Policy Statement, so it is important that any statement about existing regional plans is qualified with information about when their reviews commence. It is recommended accepting the submission subject to a reference to the review of regional plans.

South Wairarapa District Council also sought for the relationship between the Regional Policy Statement and the Wellington Regional Land Transport Strategy to be stated more clearly. The Regional Land Transport Strategy and the Regional Policy Statement are both important strategic planning documents for the region. To ensure good integration between our land use and transport planning at the regional level, it is important that each document be consistent with and support each others direction and desired or anticipated outcomes. There is a statutory requirement (section 75 (a)(iii)(B)) for any Regional Land Transport Strategy developed under the Land Transport Management Act 2003, to be **consistent with** the relevant

Regional Policy Statement developed under the Resource Management Act. The Regional Land Transport Strategy includes policies and outcomes which seek to optimise the performance of the existing network, encourage integrated land use and transportation that reduces travel demand, support energy efficient and sustainable transport modes such as walking, cycling and passenger transport, and recognise the critical role of State Highway 1 and State Highway 2 in providing for regional and national accessibility through the region. Greater Wellington staff recommend accepting all South Wairarapa District Council submissions on this point.

The **Tararua Tramping Club** sought that the words ‘of natural and physical resources’ be inserted after ‘sustainable management’ to properly reflect the purpose of the Resource Management Act section 5(1) which states *the purpose of this Act is to promote the sustainable management of natural and physical resources*. Greater Wellington staff agree that this addition more closely aligns with the Resource Management Act and recommend supporting this submission point.

The Energy Efficiency and Conservation Authority sought retention of the reference to the New Zealand Energy Strategy, New Zealand Energy Efficiency and Conservation Strategy and the Renewable Energy Assessment for the Wellington Region in section 1.3’s ‘Other strategies and companion statutes’. Greater Wellington staff recommend retaining these references.

The Energy Efficiency and Conservation Authority also sought the addition of the words ‘and the Proposed National Policy Statement on Renewable Electricity Generation’ to the end of the sentence ‘Similarly, policies and methods within this Regional Policy Statement that relate to infrastructure and energy are drawn from the National Policy Statement on Electricity Transmission’. A deletion of the final part of the sentence ‘There are a number of other national strategies promulgated by central government and its agencies that are not prepared under the Resource Management Act 1991 and have no statutory bearing on the content of a regional policy statement’ was also sought. Finally, the insertion of ‘including the target of 90% renewable electricity by 2025’ was sought to follow ‘Documents which informed this Regional Policy Statement include the New Zealand Energy Strategy to 2050 (2007) and, the New Zealand Energy Efficiency and Conservation Strategy (2007)’. This submission was supported by PowerCo Limited, supported in part by TrustPower Limited and Meridian Energy Limited, and opposed by Federated Farmers of New Zealand.

Greater Wellington staff note that a proposed national policy statement is subject to change before it becomes a national policy statement. Section 62 (3) of the Resource Management Act makes the relationship between national policy statements and regional policy statements explicit. It does not include reference to proposed national policy statements. The problem with giving effect to what’s in a

proposed national policy statement is that if it changes through the ongoing process, Greater Wellington then has to change its Regional Policy Statement when the national policy statement is gazetted. The lack of reliability of a proposed national policy statement is recognised in the law, and it is not recommended that reference be made to proposed national policy statements in the Regional Policy Statement. It is noted that the sentence “There are a number of other national strategies ... ” is correct and no deletion of part of it is recommended. Finally, the inclusion of reference to “90% renewable electricity by 2025” is not recommended because section 1 of the Regional Policy Statement provides introductory material on procedures, planning and connections with other processes. It does not address matters dealing directly with natural and physical resources themselves.

TrustPower Limited’s submission sought additions to elucidate the fact that the Regional Policy Statement would provide a framework for the potential benefits of renewable electricity generation activities consistent with the proposed National Policy Statement for Renewable Energy Generation. This submission was opposed by both Anders Crofoot and Federated Farmers of New Zealand. Section 1.3 of the Regional Policy Statement currently states that all regional policy statements must give effect to national policy statements, and the discussion on more specific issues are found in chapter 3, issues and objectives, of the Regional Policy Statement. In relation to renewable electricity section 3.3 Energy, infrastructure and waste, draws attention to objectives 9 and 10 which clearly set out the policies relating to renewable energy. Greater Wellington staff consider the current structure of the Regional Policy Statement to appropriately illustrate the approach to renewable electricity generation and therefore recommended no additions be made.

(b) Recommended decision

Submitter	Submission	Recommendation
South Wairarapa District Council	112/2	Reject
South Wairarapa District Council	112/3	Accept
South Wairarapa District Council	112/4	Accept
Tararua Tramping Club	114/2	Accept
The Energy Efficiency and Conservation Authority	117/2	Accept in part
TrustPower Limited	124/1	Reject

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend paragraph 2, page 2 as follows:

The Resource Management Act provides for a framework of policy statements, standards and plans, each of which must achieve the purpose of the Act – to promote sustainable management of natural and physical resources.

Amend paragraph 4, page 4 as follows:

All regional plans are prepared by regional councils. At the time the Regional Policy Statement was notified there were five regional plans as follows: Regional Coastal Plan, Regional Air Quality Management Plan, Regional Soil Plan, Regional Plan for Discharges to Land, and the Regional Freshwater Plan. The reviews of these five regional plans commence between December 2009 and August 2010.

Amend paragraph 8 as follows:

The Wellington Regional Strategy – a sustainable economic growth strategy for the region – provided the basis for the policies and methods on regional form, design and function. Similarly, the Wellington Regional Land Transport Strategy has contributed to policies and methods on energy, infrastructure and regional form, design and function. The Regional Land Transport Strategy is an important strategic transport planning document for the region, and consistency between it and the Regional Policy Statement helps to ensure sound integration between land use and transport planning at the regional level. There is also a statutory requirement (section 75 (a)(iii)(B) of the Land Transport Management Act 2003) for any Regional Land Transport Strategy to be consistent with the relevant Regional Policy Statement prepared under the Resource Management Act. Long term council community plans, developed by Wellington Regional Council and the district and city councils, have also informed the development of policies and methods in this Regional Policy Statement.

2.6 Chapter 2 Promoting sustainable management in the Wellington region

Submitter	Submission	Summary
Wairarapa Regional Irrigation Trust	127/1	Supported the concept of management on a water catchment basis.

Submitter	Submission	Summary
Wellington Conservation Board	132/3	Sought inclusion of a sub-section entitled Natural Outcomes for the Wellington Region.
F1/103	Winstone Aggregates	Oppose

(a) Discussion

The **Wairarapa Regional Irrigation Trust** supported the Regional Policy Statement’s concept of management on a water catchment basis. The support is noted.

The **Wellington Conservation Board** queried what outcomes are sought for ecosystems and indigenous biodiversity within the Regional Policy Statement. Greater Wellington notes this is covered in section 3.6 Indigenous Ecosystems, objective 16, which states “indigenous ecosystems and habitats with significant biodiversity values are maintained and restored to a healthy functioning state”. Identifying, protecting, managing effects, and supporting enhancement initiatives of/on these areas of significant biodiversity are covered in policies 22, 23, 46, and 64 in the Regional Policy Statement. The submitter believed natural outcomes warrant the inclusion of a sub-section, in section 2, entitled Natural Outcomes for the Wellington Region. This submission was opposed by Winstone Aggregates. Greater Wellington consider the matters are dealt with aptly in section 3.6, and note the inclusion of ‘healthy environment’ as one of the key community outcomes listed in section 2. Under this community outcome the aim is for ‘well functioning and diverse ecosystems which make up an environment that can fulfil our needs’. Greater Wellington staff recommend rejecting this submission point.

(b) Recommended decision

Submitter	Submission	Recommendation
Wairarapa Regional Irrigation Trust	127/1	Accept
Wellington Conservation Board	132/3	Reject

The further submission from Winstone Aggregates is accepted accordingly.

(c) Recommended changes

No changes are recommended to chapter 2.

2.7 Section 2.1 A sustainable region

Submitter	Submission	Summary
Noeline Gannaway	39/1	Sought, on page 7, that the word "overly" be omitted.
F1/35	Winstone Aggregates	Oppose
Tararua Tramping Club	114/3	Sought that "only" be inserted after "but" before "in such a way" to match the requirement of the Act through the "while" which introduces 5(2)(a)(b)(c).
Wellington Botanical Society	130/1	Requested deletion of 'and are not overly degraded' from paragraph 3, and deletion of any other statements implying that council can make decisions that allow degradation of the life-supporting capacity of ecosystems as long as it is not overly degraded by that decision.
Wellington Conservation Board	132/4	Page 7 Sought inclusion of alternative wording in paragraph 2: "In other words, natural and physical resources may be used and developed by people and communities to provide for their economic, social and cultural well-being, and health and safety, but in such a way that ensures natural resources are conserved for future generations, and the life-supporting capacity of ecological systems is retained or restored (remainder deleted)."
F1/104	Winstone Aggregates	Oppose

(a) Discussion

Noeline Gannaway and the **Wellington Botanical Society** sought the removal of the words 'overly' and 'and are not overly degraded' respectively from paragraph 2 of section 2.1. Noeline Gannaway's submission was opposed by Winstone Aggregates. Greater Wellington agree that the removal of the terms clarifies the idea of environmental sustainability and recommend accepting this submission point.

The **Tararua Tramping Club** considered that the insertion of the word "only" after "but" and before "in such a way" would more strongly match the requirement of the Resource Management Act's use of the word "while" which introduces section 5(2)(a)(b)(c). Greater Wellington staff recommend the above changes are incorporated.

The **Wellington Conservation Board** suggested an alternative wording to all of paragraph 2 of section 2.1. This submission was opposed by Winstone Aggregates. This suggestion deleted the same words as sought by Noeline Gannaway and the Wellington Botanical Society, as well as several other additions and deletions which are recommended for acceptance. However, Greater Wellington consider the original phrase ‘the potential of these resources are sustained for future generations’, as opposed to the suggested ‘ensures natural resources are conserved for future generation’ should be retained as it reflects more closely section 5(2)(a) of the Resource Management Act which states *in this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations.*

(b) Recommended decision

Submitter	Submission	Recommendation
Noeline Gannaway	39/1	Accept
Tararua Tramping Club	114/3	Accept
Wellington Botanical Society	130/1	Accept
Wellington Conservation Board	132/4	Accept in part

The further submissions Winstone Aggregates are rejected accordingly.

(c) Recommended changes

Amend paragraph 3, page 7 as follows:

In other words, natural and physical resources ~~can~~ may be used and developed by people and communities to provide for their economic, social and cultural wellbeing, and health and safety, but only in such a way that ensures the potential of these resources are sustained for future generations, and ~~ecological systems retain their~~ the life-supporting capacity ~~and are not~~ ~~overly degraded~~ of ecological systems is retained or restored.

2.8 Section 2.3 Community outcomes for the Wellington region

Submitter	Submission	Summary
TrustPower Limited	124/2	Sought an amendment as follows: ‘Council and the region’s city and district councils to support the achievement of this region’s community outcomes.

Submitter	Submission	Summary
		We can aim to reduce greenhouse gas emissions by reducing the use of fossil fuels for transport – for example, by investing in better public transport, encouraging more walking and cycling, reducing the need for travel, and steering development to achieve more integrated land use. In addition, renewable energy generation also reduces gas emissions by reducing the use of fossil fuels.’ And consequential changes.
Wellington Conservation Board	132/5	Sought inclusion of the following community outcome: "Involvement: communities recognise the importance of ecosystem health and natural resource conservation and are involved in care and stewardship of places they value." Stated that if the new outcomes suggested has already been set through a different process than the Regional Policy Statement that the points in the submission need to be acknowledged in some other way in the Regional Policy Statement.
Westfield New Zealand Ltd	138/2	Stated that the community outcomes should be amended to include an additional sentence as follows (or words to like effect): 'Prosperous community- all members of our community prosper from a strong and growing economy. A thriving business sector attracts and retains a skilled and productive workforce'. Existing centres of business and retail activity are sustained or enhanced.'
F12/55	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support

(a) Discussion

TrustPower Limited sought the addition of the sentence “In addition, renewable energy generation also reduces gas emissions by reducing the use of fossil fuels” at the end of the paragraph discussing ways in which the region can reduce greenhouse gas emissions from the use of fossil fuels for transport. Greater Wellington staff recommend the submission be rejected as the complex issue of the region’s renewable energy resources and future challenges is covered in section 3.3

Energy, infrastructure and waste and is more relevant there than in the community outcomes section. The community outcomes section, as discussed below, is to highlight the priorities of the people in the Wellington region.

The **Wellington Conservation Board** and **Westfield New Zealand Ltd** both sought additions to the listed community outcomes. Westfield New Zealand Ltd's submission was supported by Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd. However, the community outcomes listed in the proposed Regional Policy Statement for the Wellington Region 2009 were identified as key outcomes for the region within the Wellington Regional Strategy (June 2007) and in Wellington Regional Council's Long Term Council Community Plan 2006-2016 (amended June 2007) under Section 91 of the Local Government Act (see paragraph below). The outcomes identified through this process are community outcomes, not council outcomes, and as such it is not the role of Greater Wellington to add, alter, or delete community outcomes in the Regional Policy Statement. Rather, Greater Wellington will be one of a number of organisations and groups that will contribute to the achievement of the outcomes generated by the community. For this reason Greater Wellington staff recommend these submissions be rejected.

Section 91(1) of the Local Government Act 2002 states that *a local authority must, not less than once every 6 years, carry out a process to identify community outcomes for the intermediate and long-term future of its district or region. The Local Government Act 2002 goes on to define community outcomes as (a) outcomes for that district or region that are identified as priorities for the time being through a process under section 91; and (b) includes any additional outcomes subsequently identified through community consultation by the local authority as important to the current or future social, economic, environmental, or cultural well-being of the community.*

(b) Recommended decision

Submitter	Submission	Recommendation
TrustPower Limited	124/2	Reject
Wellington Conservation Board	132/5	Reject
Westfield New Zealand Ltd	138/2	Reject

The further submission from Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd are rejected accordingly.

(c) Recommended changes

No changes to section 2.3 are recommended

2.9 Section 2.4 Integrating the management of our natural and physical resources

Submitter	Submission	Summary
Anders Crofoot	25/4	Stated that the whole of catchment approach was supported. A catchment level is an appropriate level to deal with land based issues.
F24/4	Masterton District Council	Support
Federated Farmers of New Zealand	35/1	Asked that the Wellington Regional Council put the proposed Regional Policy Statement on hold to better investigate ways to implement the stated intention of adopting a whole of catchment approach. Stated that this will require extensive consultation with stakeholder groups and could potentially change the dynamics of the proposed plan. Stated that in the interim amendments must be made so that the concept of integrated catchment management is clearly stated as an overriding principle for policy implementation.
F22/11	Anders Crofoot	Support
The Energy Efficiency and Conservation Authority	117/3	Sought the following amendment to section 2.4 as follows: "A prime role of the Regional Policy Statement is to integrate management of the natural and physical resources of the region in response to issues of national and regional significance, including those issues of significance to Iwi authorities..." "Integrated management is relevant to managing the inter-relationships between infrastructure and its associated services and any natural resource associated with it. Infrastructure provision creates a range of positive effects and benefits. For example, an affordable, reliable and secure energy system which utilises renewable energy resources is necessary to underpin community wellbeing. In this regard, the region has significant renewable energy resources. Integrated management is also relevant to productive enterprise in rural areas and the natural resources upon which these enterprises rely."

Submitter	Submission	Summary
Wellington Botanical Society	130/2	Requested the discussion on ecosystems be removed from section 3.6 and inserted in section 2.4. Requested including the term 'ecosystem services' in section 2.4, with an associated definition. Also requested amending the definition of ecosystem to 'a biological system comprising a community of living organism and its associated non-living environment, interacting as an ecological unit'
F1/95	Winstone Aggregates	Oppose

(a) Discussion

Anders Crofoot supported Greater Wellington's whole of catchment approach of the Regional Policy Statement. This submission was supported by Masterton District Council. The support is noted.

Federated Farmers of New Zealand sought that the proposed Regional Policy Statement be put on hold to investigate further the adoption of a whole of catchment approach. The Resource Management Act requires all regional councils to produce a regional policy statement for their region and then review it every 10 years to promote the purpose of the Act. Greater Wellington is following the Act by developing this proposed Regional Policy Statement for the Wellington region in 2009. For this reason, Greater Wellington recommends this part of the submission be rejected. The whole of catchment approach to the policy suggests a need to work with multiple parties to establish shared objectives for a catchment and to ensure uses and activities are working towards the same goals or at least not working against their attainment. In short, the approach to the policy will be similar but with increased input from stakeholders when the regional plan review takes place.

Federated Farmers of New Zealand also sought for amendments to be made to make clearer the concept of integrated management as an overriding principle for policy implementation. Section 2.4 of the proposed Regional Policy Statement is dedicated to explaining what 'integrated management' is and how it relates to the policies and methods designed to address the resource management issues of the region. The section is located within the proposed Regional Policy Statement before the introduction of any issues, objectives, policies, or methods. This is to ensure that the concept of integrated management is clearly explained and to highlight this approach as a focus throughout the Statement as a whole. Greater Wellington staff therefore consider the concept of integrated management appropriately explicated as it is and recommend rejecting this part of the submission. The submission of Federated Farmers was supported by Anders Crofoot.

The Energy Efficiency and Conservation Authority sought that a prime role of the Regional Policy Statement be defined as integrating ‘management of natural and physical resources of the region in response to issues of national and regional significance’. Greater Wellington staff note that the primary role of the Regional Policy Statement comes from its statutory purpose set out in section 59 of the Resource Management Act. It includes issues of regional significance but does not include issues of national significance. Therefore, inclusion the of the words ‘national and’ is not recommended.

The Energy Efficiency and Conservation Authority also sought the addition of a specific example, relating to renewable energy resources, to paragraph 3 of section 2.4 ‘Integrating management of natural and physical resources’. Chapter 2 of the proposed Regional Policy Statement is a high level introduction to the promotion of sustainable management in the Wellington region and the idea of integrated management. Particular resource management issues and objectives are described in chapter 3 of the proposed Regional Policy Statement, which is therefore a more relevant place for specific examples. Section 3.3 ‘Energy, infrastructure and waste’ discusses the issues facing the Wellington region in relation to energy and infrastructure and for this reason Greater Wellington considers it unnecessary to include the Energy Efficiency and Conservation Authority’s renewable energy example in section 2.4 as sought.

The **Wellington Botanical Society** sought for the concepts of ‘ecosystem’ and ‘ecosystem services’ to be introduced earlier in the Regional Policy Statement. At present the terms are discussed in section 3.6 ‘Indigenous ecosystems’, but the submitter felt they would be more useful in section 2.4 ‘Integrating management of natural and physical resources’. Greater Wellington agree that the concepts of ecosystem and ecosystem services underpin many aspects of resource management and an early explanation within the Regional Policy Statement would be beneficial. Greater Wellington staff recommend accepting the inclusion of ecosystem and ecosystem services in section 2.4 as below. The submitter also sought for the current definition of the term ‘ecosystem’ to be modified from the current “any system of interacting terrestrial or aquatic organisms within their natural and physical environment”. Greater Wellington recommend this modification be rejected as the current definition is in line with the Environment Act 1986. Winstone Aggregates opposed Wellington Botanical Society’s submission.

(b) Recommended decision

Submitter	Submission	Recommendation
Anders Crofoot	25/4	Accept
Federated Farmers of New Zealand	35/1	Reject

Submitter	Submission	Recommendation
The Energy Efficiency and Conservation Authority	117/3	Reject
Wellington Botanical Society	130/2	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend paragraph 2, page 11 as follows:

Taking a whole of catchment approach is promoted within this Regional Policy Statement. It means considering the full mix of purposes, uses and activities within a catchment in terms of how these interact and contribute to outcomes within the catchment and for receiving environments beyond – such as in relation to ~~indigenous ecosystems~~, soil productivity, water quality, erosion and stormwater control, or natural hazards. A whole of catchment approach is particularly useful for understanding and managing indigenous ecosystems and their complex interconnections. As well as having their own intrinsic values, healthy ecosystems provide us with ecosystem services that support our existence by providing clean air and water, productive soils and natural filtering processes. Providing for the community’s needs while sustaining our ecosystems in a healthy state is one of our largest challenges. The whole of catchment ~~This~~ approach suggests a need to work with multiple parties to establish shared objectives for a catchment and to ensure uses and activities are working towards the same goals or at least are not working against their attainment.

2.10 Section 2.5 Application of the Regional Policy Statement across physical and jurisdictional boundaries

Submitter	Submission	Summary
Marlborough District Council	72/1	Stated that it may be appropriate to consider biosecurity as a cross boundary matter within the Regional Policy Statement. Stated that a decision to incorporate this cross boundary matter into the Regional Policy Statement could involve the inclusion of regional objectives and policies relating to biosecurity management and containment, and biosecurity management methods including communication and collaboration with Marlborough District Council associated with these issues.

Submitter	Submission	Summary
Transpower New Zealand Limited	123/4	Sought that section 2.5 be amended to clearly identify the need for a consistent approach to be taken to lineal network utilities, including the National Grid. This could be achieved by including text to the following effect: "Promote a collaborative and consistent approach to managing regionally significant infrastructure that crosses zone and/or territorial authority boundaries."
F5/3	PowerCo Limited	Support
F17/4	Meridian Energy Limited	Support in part
Westfield New Zealand Ltd	138/3	Page 12, 5th bullet point. Supported recognition of this issue, but recommended a minor amendment to change 'and' to 'and/or'.
F12/56	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support

(a) Discussion

Marlborough District Council sought biosecurity be considered as a cross boundary matter within the Regional Policy Statement. The submitter also sought for the possible inclusion of regional objectives and policies relating to biosecurity management and containment, and biosecurity management methods including communication and collaboration with Marlborough District Council associated with these issues. Greater Wellington staff comment that when considering the appropriateness of objectives, policies, and methods for inclusion in the Regional Policy Statement, other statutory frameworks are sometimes more relevant and may provide alternative and better means for addressing some issues. The Greater Wellington Regional Pest Management Strategy (2002-2022), prepared under the Biosecurity Act 1993, provides a strategic and statutory framework for effective and proficient management of selected pest animal and pest plant species in the Wellington region. Under Section 76(4) of the Biosecurity Act 1993, this strategy shall not be inconsistent with any other Regional Pest Management Strategy by another organisation, whether within the same region or any other region, or any national pest management strategy. Greater Wellington, therefore, suggest that

the Regional Pest Management Strategy, and not the Regional Policy Statement, is the most appropriate framework for biosecurity cross boundary matters and therefore recommends that this submission is rejected.

Transpower New Zealand Limited sought an addition to the list of ways Greater Wellington and the region’s city and district councils will promote consistent and integrated application of the objectives, policies and methods contained within the Regional Policy Statement. In particular, the proposed addition would reflect the need for a consistent approach to be taken to lineal network utilities. Transpower New Zealand Limited sought to include a bullet point as follows: “Promote a collaborative and consistent approach to managing regionally significant infrastructure that crosses zone and/or territorial authority boundaries”. This submission was supported by PowerCo Limited and supported in part by Meridian Energy Limited. Greater Wellington staff consider the inclusion of the word ‘zone’ in the proposed addition inappropriate as the term is not clearly defined. However, Greater Wellington staff recommend that the remainder of the addition be accepted as below.

Westfield New Zealand Ltd supported Greater Wellington’s recognition of the issue of the application of the Regional Policy Statement across physical and jurisdictional boundaries, with a minor addition of changing “or’ to and/or in the fifth bullet point which Greater Wellington staff recommend be accepted. This submission was supported by Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd.

(b) Recommended decision

Submitter	Submission	Recommendation
Marlborough District Council	72/1	Reject
Transpower New Zealand Limited	123/4	Accept in part
Westfield New Zealand Ltd	138/3	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend the last paragraph on page 12 as follows:

Wellington Regional Council and the region’s district and city councils will promote consistent and integrated application of the objectives, policies and methods contained in this Regional Policy Statement. To this end, they will:

- Promote an integrated approach to managing resource consent applications where the application site or effects arising from the proposed activity cross regional or district boundaries and/or have implications for adjoining local authorities.
- Promote a collaborative and consistent approach to managing regionally significant infrastructure that crosses territorial authority boundaries.

2.11 Chapter 3 Resource management issues, objectives and summary of policies and methods to achieve the objectives

Submitter	Submission	Summary
New Zealand Pork Industry Board	88/1	Stated that the Minister for the Environment has stated national priorities as being climate change, fresh water and biodiversity, in that order and that the Regional Policy Statement would benefit from a similar prioritisation of the list on page 13 to help inform effective investments in succeeding stages
Tararua Tramping Club	114/4	Stated that the Statement was inconsistent in its explicit inclusion of public access in headings regarding the coastal environment and fresh water. The draft made it explicit with "(including public access to and along)" in both cases in the content list but not in the actual (2.2 & 2.4) headings. Noted that the Statement has corrected that by having the (3.2 & 3.4) headings match the content list. Noted that "to and along" has been dropped and although that phrase makes the issue clearer, did not oppose that change as the wording was awkward and that detail is available indirectly from the Act. However, stated that enclosing the requirement in parentheses tends to imply it is of comparatively low importance so sought that the parentheses around "including public access" be removed. Additionally sought that "including public access" be added to these items in the list on page 13.
Wellington Fish and Game Council	133/2	Supported the identified regionally significant resource management issues.

(a) Discussion

New Zealand Pork Industry Board stated that the Minister for the Environment outlines national priorities. These are climate change, fresh water and biodiversity. They stated that the Regional Policy Statement would benefit from a similar prioritisation to the list on page 13 to help inform effective investment. The list on page 13 is the

topics addressed by the Regional Policy Statement in alphabetical order. Each topic presents the issues. All issues have been determined to be of regional significance and of significance to the region's iwi authorities in accordance with section 62(1)(a) and (b) of the Act. It is therefore not appropriate to prioritise the list. It is however noted that Greater Wellington intends to prepare an Implementation Plan, which will look at how methods in the Statement will be prioritised over the next ten years. This plan will be prepared with city and district councils and in consultation with key stakeholders. See recommended changes to section 4.5.

Tararua Tramping Club stated that the Regional Policy Statement had inconsistently included public access in headings regarding the coastal environment and fresh water. They sought that "including public access" be added to the items in the list on page 13. They however sought that the parentheses around "including public access" be removed. They noted that "to and along" has been dropped and although the phrase made the issue clearer, they did not oppose - as the wording was awkward and the detail is available indirectly from the Act. It is recommended that the changes be accepted. The proposed changes will help users understand where and how public access has been addressed by the Regional Policy Statement.

Wellington Fish and Game Council supported the identified regionally significant resource management issues. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
New Zealand Pork Industry Board	88/1	Reject
Tararua Tramping Club	114/4	Accept
Wellington Fish and Game Council	133/2	Accept

(c) Recommended changes

Remove all parentheses around "including public access" in the contents and at the top of section 3.2 and 3.4.

Amend the list of topics on page 13 in response to submissions above and in response to submissions on section 3.9 'Resource Management with tangata whenua', as follows.

3. Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement

This chapter provides an overview of the ~~regionally significant resource management issues (including the issues of significance to iwi authorities)~~ addressed by the Regional Policy Statement, the objectives sought to be achieved and provides a summary of the policies and methods to achieve the objectives. They ~~se~~ are addressed presented under the following topic headings:

- air quality
- coastal environment, including public access
- energy, infrastructure and waste
- fresh water, including public access
- historic heritage
- indigenous ecosystems
- landscape
- natural hazards
- regional form, design and function
- resource management with tangata whenua
- soils and minerals.

Each section in this chapter addresses a topic then introduces the issues. All the issues are issues of regional significance and have been identified as issues of significance to the Wellington region’s iwi authorities. Each ~~topic~~ section includes a summary table showing all the objectives that relate to that topic and the titles of the policies and methods that will achieve those objectives. The table also includes a reference to other policies that need to be considered alongside to gain a complete view of the issue across the full scope of the Regional Policy Statement.

2.12 Section 3.1 Air quality

Submitter	Submission	Summary
Winstone Aggregates	15/4	Sought addition of a new Issue to Section 3.1 as follows: 3. Reverse Sensitivity Effects Reverse Sensitivity effects can arise where sensitive activities locate in close proximity to discharging activities. Such conflict can result in the discharging activity being forced to shut down, relocate or significantly alter its operations.
F19/1	Horticulture New Zealand	Support

Submitter	Submission	Summary
F23/4	Federated Farmers of New Zealand	Support
Michael James Curtis	27/1	Opposed section. Stated that the Regional Policy Statement did not consider landowner rights and that there was no compensation to landowners who are affected.
East Harbour Environmental Association Incorporated	33/3	Stated that the objectives and policies sound sensible and comprehensive. Sought clarification of whether the implications of air quality in neighbouring airsheds, the effect of wind, and cumulative impacts are considered in the policies regarding individual airsheds. Sought clarification of whether noise is considered under air quality.
F13/1	Wellington International Airport Limited	Oppose
Federated Farmers of New Zealand	35/2	Sought amendment to the introduction to include the following paragraph (or words to this effect): At times primary production activities will generate effects such as noise, odour and dust - residents living in the rural environment should therefore reasonably expect amenity values to be modified by such effects
F13/2	Wellington International Airport Limited	Oppose
F19/2	Horticulture New Zealand	Support
F22/12	Anders Crofoot	Support
F24/30	Masterton District Council	Support
John Christopher Horne	49/1	Sought addition of a reference to exhaust emissions as per the previous Regional Policy Statement (1995) into para 2.
John Christopher Horne	49/2	Sought addition of the contribution to the total global greenhouse gas emissions, page 15, para 3 point 3.

Submitter	Submission	Summary
Horticulture New Zealand	50/4	Sought that Issue 1, objective 1 and policies 1 and 2 be amended to include the potential reverse sensitivity effects of off target agrichemical spray drift. Sought that need to ensure that the Regional Policy Statement provides mechanisms to address linkages between regional and district plan where there is overlap and potential for confusion.
F22/13	Anders Crofoot	Support
F1/42	Winstone Aggregates	Support
Kapiti Coast District Council	56/2	Generally supported the issues identified relating to Air Quality. Agreed with objectives 1 and 2. Supported the proposed regulatory as well as non-regulatory methods to manage health impacts of fine particles as requested in Council's submission on the Draft Regional Policy Statement. Therefore supported policies 1 & 2 and the methods proposed. However, were concerned that there has been no monitoring of air quality in the Kapiti District. Noted that due to this lack of monitoring it is not known whether this is a significant issue for the District. Strongly requested that air quality monitoring be undertaken to enable early identification of any air quality issues and to ensure these issues can be addressed to meet the air quality standard by 2013. Noted that this point was also made in the Council's submission on the Draft Regional Policy Statement.
Masterton District Council	74/5	Sought that the wording in the Air Quality chapter includes recognition of the economic and social benefits of the primary production sector.
F19/3	Horticulture New Zealand	Support
F23/5	Federated Farmers of New Zealand	Support
New Zealand Defence Force	86/1	Sought retention of the intent of the Air Quality Issues and Air Quality objectives 1 and 2.
New Zealand Pork Industry Board	88/2	Asked for the reference to 'factory farming' on pg 15 be 'tidied up' as per the reasons noted in the submitters submission on the draft Regional Policy Statement (see attachment to full submission).

Submitter	Submission	Summary
The Energy Efficiency and Conservation Authority	117/4	Sought the addition of the following to section 3.1: "There is potential in the region for the use of cleaner fuels combined with modern burning technologies which utilise wood pellets, firewood, fire-logs and wood chips in residential and commercial wood burners. These can reduce fine particulate matter compared with non-renewable fuels, displace carbon dioxide emissions and improve local amenity."
Wellington City Council	131/1	Supported the objectives, policies and methods relating to this topic.
Wellington Fish and Game Council	133/3	Supported the issues, policies and methods relating to the maintenance of air quality throughout the Greater Wellington region and sought that they be retained.
Wellington International Airport Limited	134/1	Stated that air quality and visibility are critical concerns for the Airport. Requested that the general discussion in section 3.1 be amended to reflect the effect visibility has on airport operations. Also requested that policies be correspondingly amended and that future application for resource consents, involving particulate matter be notified to Wellington International Airport Limited for approval.
F11/8	Paraparaumu Airport Limited	Support

(a) Discussion

Winstone Aggregates sought to add a new issue to section 3.1 air quality on reverse sensitivity. The submission was supported by Horticulture New Zealand and Federated Farmers of New Zealand. Staff note that reverse sensitivity is a situation that can develop when sensitive activities locate close to land uses that produce odour, smoke and dust. The issue that is being addressed in this case (i.e., issue 1) is the impacts from odour, smoke and dust on people's amenity values and well-being. However, the policy response (in policy 1) of keeping sensitive activities a sufficient distance from the source of odour, smoke and dust is what distinguishes reverse sensitivity. Officers do not recommend a new issue be adopted because one is not required.

Michael James Curtis opposed the entire section as the proposed Regional Policy Statement does not consider landowner rights and compensation. Staff note the proposed Regional Policy Statement has been prepared to achieve the purpose of the Resource Management Act, which is to promote the sustainable management of natural and physical resources in the region. The Resource Management Act does

not have any provision for compensation for the loss of landowner rights for the air quality provisions in the proposed Regional Policy Statement.

East Harbour Environmental Association Incorporated sought clarification on the effects of local winds on sources of air pollution and whether the proposed Regional Policy Statement considers the effects of winds. The submission was opposed by Wellington International Airport Limited. Officers note localised winds are assessed as part of resource consent applications for discharges to air. For significant discharges the resource consent process requires modelling to ensure there is sufficient dispersion of pollutants into the atmosphere. Wind is taken into account in these modelling exercises. The cumulative effects of air pollution are also taken into account when processing resource consent applications for discharges to air for relatively large scale discharges. Officers consider that the proposed Regional Policy Statement does not need to specifically refer to the effects of wind and the cumulative effects of other air pollutants as this is assessed through the *Regional Air Quality Management Plan for the Wellington Region* when assessing resource consent applications. East Harbour Environmental Association sought whether noise is considered as part of air quality. Staff note noise is usually controlled by city and district councils under the Resource Management Act. Noise was not assessed to be a significant issue in the region for the proposed Regional Policy Statement to consider from the influences of wind.

Federated Farmers of New Zealand sought a new paragraph to point out that rural activities will generate effects such as noise, odour and dust and residents living in this environment should be aware of these. The submission was opposed by Wellington International Airport Ltd. Horticulture New Zealand, Anders Crofoot and Masterton District Council supported the submission. The introductory section 3.1 air quality describes the effects of odour, smoke and dust in a very general way without selecting particular activities or areas of the region. Issue 1, objective 1 and policy 1 specifically address the effects of odour, smoke and dust for all areas in the region, including the rural zone. Officers consider that section 3.1 air quality should remain without specific mention of selected areas of the region and their activities.

John Christopher Horne sought an addition to the second paragraph of section 3.1 air quality that ‘other emissions’ can come from motor vehicles. Staff note, the section on air contaminants is general and refers to the main discharges in the region, including discharges from motor vehicles, in the bullet points on the first page. No other reference is needed.

John Christopher Horne sought the addition of the words ‘total global greenhouse emissions’ into the third point about motor vehicle emissions. Staff note that section 3.3 energy, infrastructure and waste

in the proposed Regional Policy Statement describes the issue of reducing carbon dioxide from motor vehicle emissions. Officers consider the issue of greenhouse emissions is more appropriately dealt with in this section.

Horticulture New Zealand sought the introduction of ‘targeted agricultural spray drift’ into section 3.1 air quality. The submission was supported by Anders Crofoot and Winstone Aggregates. Officers note that targeted agricultural spray drift was not recognised as a significant resource management issue for the proposed Regional Policy Statement. There have been isolated reported cases of spray drift in and around the wine growing district of Martinborough, but these cases have not led to an issue of regional significance. Targeted agricultural spray drift is addressed in the *Regional Air Quality Management Plan for the Wellington Region* and the issue is controlled by Rule 1 of this Plan.

Kapiti Coast District Council supported the scope of the air quality chapter, including the identified issues, objectives and policies. The Kapiti Coast District Council however, sought that monitoring be undertaken in the Kapiti Coast district to establish if there is an air quality problem there. Officers acknowledge the Council’s concerns however questions about monitoring of air sheds are not made as part of the proposed Regional Policy Statement. Air quality monitoring is addressed in the *Regional Air Quality Monitoring Strategy for the Wellington Region*. Greater Wellington reviews the strategy as required.

Masterton District Council sought re-wording of the air quality section to recognise the importance of the primary production sector to the economic and social benefits of the region. The submission was supported by Horticulture New Zealand and Federated Farmers of New Zealand. Officers agree the rural sector contributes to the economic and social well-being of the region and this contribution is addressed fully in policy 55. Officers do not agree that reference to the primary sector needs to be made in section 3.1 on air quality.

New Zealand Defence Force sought retention of objectives 1 and 2 and policies 1 and 2. Greater Wellington staff have recommended retaining objectives 1 and 2 and policies 1 and 2.

New Zealand Pork Industry Board sought that the reference to ‘factory farms’ be removed from the proposed Regional Policy Statement, on page 15. Officers agree, the word should be removed from the proposed Regional Policy Statement as it has been removed from the Resource Management Act.

The Energy Efficiency and Conservation Authority sought an addition to section 3.1 air quality on the benefits of using cleaner burning fuels and modern technologies such as wood pellet burners. Officers agree there are benefits to using cleaner forms of heating

other than domestic fires as they may reduce fine particulate matter in problem air sheds. However, section 3.1 provides introductory and background material to air quality in the region leading to the statement of issues. The new clean burning technologies referred to by the submitter are matters for implementation of policy 2, in the regional air quality management plan. The air shed action plans that are described in more detail in method 26 are also a place where new technologies can be introduced to reduce fine particulate matter in problem air sheds.

Wellington City Council supported the objectives, policies and methods of the air quality section. The support is noted.

Wellington Fish and Game Council supported the objectives, policies and methods of the air quality section. The support is noted.

Wellington International Airport Limited sought an amendment to section 3.1 air quality to show the potential effect very fine particulate matter may have on aircraft movements. The submitter proposed that a new policy be included to reflect this, and that future resource consent considerations are notified to the Wellington International Airport Limited for their approval. The submission was supported by Paraparaumu Airport Limited. Dust and smoke can produce fine particulate matter but this is only of a localised nature in the Wellington City air shed, and has not been reported to Greater Wellington at a level that would affect aircraft movements. The Wellington City Council district plan has provisions to safeguard the integrity of Wellington airport, and localised dust and smoke issues are dealt with in this Plan. Nevertheless, the proposed Regional Policy Statement has provisions to deal with smoke and dust through policies 1 and 2 and in method 30.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/4	Reject
Michael James Curtis	27/1	Reject
East Harbour Environmental Association Incorporated	33/3	Reject
Federated Farmers of New Zealand	35/2	Reject
John Christopher Horne	49/1	Reject
John Christopher Horne	49/2	Reject
Horticulture New Zealand	50/4	Reject

Submitter	Submission	Recommendation
Kapiti Coast District Council	56/2	Reject
Masterton District Council	74/5	Reject
New Zealand Defence Force	86/1	Accept
New Zealand Pork Industry Board	88/2	Accept
The Energy Efficiency and Conservation Authority	117/4	Reject
Wellington City Council	131/1	Accept
Wellington Fish and Game Council	133/3	Accept
Wellington International Airport Limited	134/1	Reject

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend the fourth bullet on Page 15 to:

- Industrial discharges from sources – such as abrasive blasting, wood processing ~~and factory farms~~ – can have localised adverse effects. Industries that discharge to air are largely concentrated around Seaview.

2.13 Section 3.1 Air quality - Issue 1: Impacts on amenity and wellbeing from odour, dust and smoke

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/3	Sought Issue 1 be amended as follows (or words to this effect): 1. Amenity values and wellbeing can be adversely affected by discharges such as odour, smoke and dust which are inconsistent with the predominant land use and environmental quality of the character areas within the region
F22/14	Anders Crofoot	Support
John Christopher Horne	49/3	Sought additional new point (1(d)) to Issue 1, emissions from motor vehicles.

Submitter	Submission	Summary
New Zealand Defence Force	86/2	Sought that clause (b) be amended by deleting words "domestic" and "backyard".

(a) Discussion

Federated Farmers of New Zealand sought a reworking of issue 1 to incorporate the ‘surrounding environment’ into the issue statement as this can have a bearing on odour, smoke or dust issues. The submission was supported by Anders Crofoot. Officers note the surrounding environment can bring a different perspective when dealing with issues such as odour in the rural environment. However, issue 1 occurs across the region, with odour effects in the rural environment, but also in the industrial and commercial sectors. Staff consider that issue 1 correctly states the problem of odour, smoke and dust across all sectors and does not require amending.

John Christopher Horne sought a new issue to be added to issue 1 – ‘emissions from motor vehicles’. Officers note that emissions from motor vehicles have not been addressed as a significant resource management issue affecting the amenity values and people’s wellbeing. There are localised occurrences where motor vehicles do cause a reduction in amenity value and wellbeing but this has not been reported as a widespread issue affecting the region.

The **New Zealand Defence Force** sought removal of the words ‘domestic’ and ‘backyard’ from issue 1 (b). Officers note that smoke has been identified as a significant resource management issue affecting amenity values and people’s well-being. A common source of smoke affecting these values is from domestic fires creating a smoke nuisance to neighbouring properties and people burning-off rubbish and green waste in their backyards. These two instances are the majority of cases for smoke discharges and have been given specificity in the proposed Regional Policy Statement. To remove these words from the issue statement would reduce the scope and meaning to be addressed.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/3	Reject
John Christopher Horne	49/3	Reject
New Zealand Defence Force	86/2	Reject

The further submission from Anders Croofoot is rejected accordingly.

(c) Recommended changes

There are no recommended changes to issue 1.

2.14 Section 3.1 Air quality - Issue 2: Health effects from discharges of fine particulate matter

Submitter	Submission	Summary
John Christopher Horne	49/4	Sought additional reference to Issue 2 on the contribution of particulate matter from diesel exhaust emissions. Also sought changes objectives 1 and 2 accordingly.

(a) Discussion

John Christopher Horne sought an addition to issue 2 on the contribution of fine particulate matter from diesel exhausts. Air quality monitoring by Greater Wellington adjacent to arterial roads shows that fine particulate (PM₁₀), carbon monoxide (CO) and nitrogen dioxide (NO₂) arising from motor vehicle emissions do not reach levels that affect human health. Emission surveys of airsheds shows a similar pattern that motor vehicle emissions (including emissions from diesels vehicles) are very low in proportion to fine particulate emissions from domestic fires. Officers consider that upon occasion diesel emissions may appear to be contributing to fine particulates in local areas, but there is no evidence in this region that diesel emissions are up to levels that are having an effect on people's health.

(b) Recommended decision

Submitter	Submission	Recommendation
John Christopher Horne	49/4	Reject

(c) Recommended changes

There are no recommended changes to issue 2.

2.15 Objective 1

Submitter	Submission	Summary
Airways Corporation of New Zealand Ltd	4/1	Sought that objective 1 be amended as follows: Discharges of odour, smoke and dust and high velocity vertical discharges to air do not adversely affect amenity values and peoples wellbeing or the safety of aircraft while in the air.

Submitter	Submission	Summary
F11/2	Paraparaumu Airport Limited	Support
Department of Corrections	32/1	Sought that objective 1 be retained in current form without modifications as they will potentially benefit Corrections by ensuring that sensitive activities are protected from new land uses or activities that emit odours, smoke or dust.
F23/6	Federated Farmers of New Zealand	Support in part
Federated Farmers of New Zealand	35/4	Sought objective 1 be amended as follows (or words to this effect): Discharges of odour, smoke and dust to air do not significantly adversely affect amenity values and people's wellbeing as appropriate to the predominant land use and consequential environmental quality of different character areas within the region
F1/27	Winstone Aggregates	Support in part
F22/15	Anders Crofoot	Support
Higgins Group Holdings Ltd	48/1	Sought retention of objective
Horticulture New Zealand	50/5	Sought that objective 1 refer to 'significant adverse effect on amenity values'
F1/43	Winstone Aggregates	Support
F22/16	Anders Crofoot	Support
F23/7	Federated Farmers of New Zealand	Support in part
Makara Ohariu Community Board	69/1	Supported the reverse sensitivity objective including both alternatives, i.e. new sensitive activities not locating close to land uses that generate odour smoke or dust, and new land use activities locating near sensitive activities.
F1/53	Winstone Aggregates	Oppose

Submitter	Submission	Summary
South Wairarapa District Council	112/5	Supported
Wellington City Council	131/45	Supported

(a) Discussion

Airways Corporation of New Zealand Ltd sought a change to objective 1 to take account of high velocity vertical discharges for aircraft safety in the region. The submission was supported by Paraparaumu Airport Limited. The focus of objective 1 is on regionally significant resource management issues of odour, smoke and dust affecting amenity values and people’s wellbeing. The change sought, to take into account a specific issue relating to aircraft movements, is not within the scope of the regional issue and is dealt with in district plans where it applies. Officers consider the submission from Airways Corporation of New Zealand Ltd is for specific areas of aircraft movement and not an issue of regional significance to be addressed by the proposed Regional Policy Statement.

Department of Corrections supported objective 1 in its current form. Their submission was supported by Federated Farmers of New Zealand. Staff note the support.

Federated Farmers of New Zealand sought a change to objective 1, to only consider discharges of odour, smoke and dust that do not ‘significantly’ adversely affect amenity values, and the inclusion of a statement to the effect that the objective is appropriate to the predominate land use and consequential environmental quality of different character areas within the region. The submission was supported by Anders Crofoot. Officers note the focus of objective 1 is on regionally significant issues facing the region regarding people’s amenity values and wellbeing. The objective covers all parts of the region – for all land uses and different character areas. It also addresses the cumulative results of discharges. There are no exceptions to where the aims of the objective have focus. Officers consider that character areas or specific parts of the region, such as the rural environment, are all part of the region and do not need to be considered separately or have special considerations in the objective statement. The submitter suggested the objective consider discharges that significantly adversely affect amenity values. Officers note that the issue of odour and smoke is a chronic one in the region. If objective 1 were to consider only ‘significant’ incidences of odour, smoke and dust then only those occurrences deemed to be large

enough to be termed significant would be assessed as affecting people's amenity values and well-being. Officers consider this approach to have a too narrow focus and would not address issue 1 satisfactorily.

Higgins Group Holdings Ltd sought retention of objective 1. Staff recommend retaining objective 1 as proposed.

Horticulture New Zealand sought that the word 'significantly' be added before adverse effect to ensure that any resulting policies and methods focus on matters of significance only. The submission was supported by Winstone Aggregates, Anders Crofoot and Federated Farmers of New Zealand (in part). Officers consider for objective 1 to focus on only significant adverse effects on amenity values would reduce the focus of the objective considerably. Discharges of odour and smoke are chronic issues for the proposed Regional Policy Statement to address. To only focus on significant adverse effects would greatly reduce the incidences of these types of discharges without actually addressing the problem across the region. Officers consider that objective 1 and policy 1 are appropriate to solve the issue of discharges of odour, smoke and dust affecting people's amenity values in the region.

Makara Ohariu Community Board supported objective 1. Their submission was opposed by Winstone Aggregates. Staff note the support.

South Wairarapa District Council supported objective 1. Staff note the support.

Wellington City Council supported objective 1. Staff note the support.

(b) Recommended decision

Submitter	Submission	Recommendation
Airways Corporation of New Zealand Ltd	4/1	Reject
Department of Corrections	32/1	Accept
Federated Farmers of New Zealand	35/4	Reject
Higgins Group Holdings Ltd	48/1	Accept
Horticulture New Zealand	50/5	Reject
Makara Ohariu Community Board	69/1	Accept
South Wairarapa District Council	112/5	Accept

Submitter	Submission	Recommendation
Wellington City Council	131/45	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

There are no recommended changes to objective 1.

2.16 Objective 2

Submitter	Submission	Summary
South Wairarapa District Council	112/6	Supported
Wellington City Council	131/46	Supported

(a) Discussion

South Wairarapa District Council and **Wellington City Council** supported objective 2. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
South Wairarapa District Council	112/6	Accept
Wellington City Council	131/46	Accept

(c) Recommended changes

There are no recommended changes to objective 2.

2.17 Section 3.2 Coastal environment

Submitter	Submission	Summary
Winstone Aggregates	15/5	Sought that Section 3.2 be deleted, redrafted and re-notified so it was more balanced and appropriate in terms of the Resource Management Act 1991. Sought deletion of the relevant objectives, policies and methods and that these be replaced with provisions which are appropriate in terms of the Resource Management Act 1991 and the New Zealand Coastal Policy Statement. Stated that

Submitter	Submission	Summary
		<p>they need to recognise the positive aspects of development and use within the coastal environment, including objectives and policies which recognise that there are uses and development which depend upon the coastal environment where the resource is located, and functionally can only be located in the coastal environment. It is also necessary to recognise that due to the complexity of the coastal environment, that the effects of some proposed activities may not also be able to be completely known or understood prior to undertaking the activity and that an adaptive management approach is appropriate in these circumstances.</p> <p>Stated that any revised suite of provisions should include objectives and policies which recognise and provide for appropriate use and development within the coastal environment, such as sand and gravel extraction, and for adaptive management approaches to be applied where all the effects of a proposed activity are not fully known or understood.</p>
F17/5	Meridian Energy Limited	Oppose
CentrePort Wellington	23/1	Stated concerns regarding the preservation of 'Natural Character' and the impact of the landward extent of the 'Coastal Environment'. Amend to provide recognition for commercial developments other than operational port development or activities in highly modified character areas where the public interest can be satisfied.
F1/6	Winstone Aggregates	Support
F20/4	Westfield New Zealand Ltd	Oppose
CentrePort Wellington	23/2	Sought addition of a new issue to read '5. Some Infrastructure and Activities Require Coastal Locations – There are certain commercial functions, which of their very nature, require the development of infrastructure and the conducting of activities in the coastal marine area. Such activities should be able to justify a location in the coastal marine area through demonstrating that either it is Regionally Significant Infrastructure or is otherwise in the public interest.' And additional

Submitter	Submission	Summary
		supporting objectives, policies, and methods.
F9/1	NZ Transport Agency	Support
F13/3	Wellington International Airport Limited	Support
Anders Crofoot	25/5	Stated that the economic purpose of farming in the coastal environment needs to be recognised, as well as the fact that pasture is a highly managed man modified land cover.
F23/8	Federated Farmers of New Zealand	Support
F24/5	Masterton District Council	Support
East Harbour Environmental Association Incorporated	33/4	Stated that the objectives and policies sounded admirable but would need to be very robust to be successful. Requested more emphasis be given to sea level rise. Stated that sea level rise over the next century is projected to exceed 1 metre, and Greater Wellington should begin putting a strategy in place to address this, such as requiring new development to be placed above the 1 metre sea rise level.
Federated Farmers of New Zealand	35/4	Sought the inclusion of a new paragraph which recognises the reality that vast tracts of the coastal environment are in private ownership with the predominant land use being primary production. Stated that like infrastructure, this is also essential to the community's social, economic and cultural wellbeing which should result in a certain amount of tolerance towards adverse effects.
F22/17	Anders Crofoot	Support
F24/31	Masterton District Council	Support
Kapiti Coast District Council	56/3	Requested that the proposed Regional Policy Statement be amended to include any changes to the proposed New Zealand Coastal Policy Statement.

Submitter	Submission	Summary
		Agreed with the concerns raised in the proposed Regional Policy Statement regarding the discharge of contaminants affecting the coastal environment. Believed that this issue needs to be addressed in conjunction with Horizons Regional Council as many pollutants come from north of the District. Supported issues 1 to 4 and objectives 3 to 8.
F15/1	Porirua City Council	Support
F19/4	Horticulture New Zealand	Support in part
Mighty River Power	83/4	Retain the recognition of significant wind and marine energy resources in the region.
F8/3	TrustPower Limited	Support
New Zealand Historic Places Trust	87/1	That the Council undertake further research into identifying regionally significant coastal areas, and develop as a schedule to include as a variation to the proposed Regional Policy Statement.
F14/1	East Harbour Environmental Association Incorporated	Support
F15/2	Porirua City Council	Support
NZ Transport Agency	91/2	Supported the reference to the important role of the region's infrastructure in the coastal environment on page 19.
Oil Companies	92/1	Sought retention of the recognition, in Paragraph 3 of the Introduction to the Coastal Environment Chapter (Section 3.2), that significant infrastructure is located in the coastal environment and that this infrastructure is essential to the community's economic and social wellbeing.
Porirua City Council	100/2	Supported the approach taken by the Regional Policy Statement in regard to the coastal environment, particularly the onus of maintaining and enhancing the coastal environment, and the range of policies and methods that seek to achieve this. However, sought that Porirua Harbour be explicitly recognised by the policies of the Regional Policy Statement to take account of its regional and national significance; and its ecological, cultural, social and economic values.

Submitter	Submission	Summary
		<p>Sought a new regulatory policy and method to specifically address the harbour and its catchments. Stated that the new proposed policy would need to be implemented under objectives 3, 5, 6, 7. The policy would be implemented by its own proposed method and methods 1 and 2. The suggested wording for the proposed policy and method are as follows:</p> <p>District and Regional Plans with jurisdiction over all or part of the Porirua Harbour catchment area shall include policies, rules and/or methods that:</p> <ul style="list-style-type: none"> (a) recognise and acknowledge the regional significance of Porirua Harbour; and (b) recognise and provide for the maintenance, protection and enhancement of the significant amenity, recreational, ecological and cultural values associated with the Porirua Harbour. <p>Explanation: Porirua Harbour includes the Pauatahanui inlet and the Onepoto arm. Porirua Harbour contains a nationally significant ecosystem and has high cultural significance to Ngati Toa. While the harbour is a recognised aesthetic, natural and community asset, parts of it have been significantly impacted by historic and current land and coastal management practices. The regulatory approach of the Regional Policy Statement seeks to address the discharge of sediment, nutrients and other contaminants into the harbour and its ecological health through regional and district plans. However, general regulatory policies cannot address the cross-boundary issues associated with the management of the harbour, and the need to address existing land management practices that are increasingly impacting the harbour. A non-regulatory method is also necessary to address the issues that cannot be resolved through a regulatory approach, but that are vital in restoring the mauri and ecological health of the harbour. Further, the integrated and coordinated management of Porirua Harbour between Porirua City Council, Wellington City Council and Wellington Regional Council is vital to protecting and restoring the harbour.</p> <p>Method: Prepare a harbour and catchment management strategy for Porirua Harbour to address the restoration of Porirua Harbour and reduce the discharge of sediment, nutrients and contaminants into the harbour.</p> <p>Implementation: Wellington Regional Council,</p>

Submitter	Submission	Summary
		Porirua City Council and Wellington City Council.
F23/9	Federated Farmers of New Zealand	Oppose in part
F12/2	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
South Wairarapa District Council	112/7	Agreed with the concerns regarding the discharge of contaminants affecting the coastal environment.
South Wairarapa District Council	112/8	Sought that the Regional Policy Statement strongly discourages medium/large-scale subdivision in coastal areas.
F14/2	East Harbour Environmental Association Incorporated	Support
Tararua Tramping Club	114/5	Supported policies in this chapter to eliminate pollution of these waters and more generally to protect the natural ecosystems.
The Energy Efficiency and Conservation Authority	117/5	Supported. Sought retention of recognition of the significant wind and marine energy resources in the region and sought addition of an additional issue in Chapter 3, section 3.2 as follows: "5. Managing the appropriate subdivision, use and development of the coastal environment Some uses and developments require coastal locations including ports, transport infrastructure and energy generation and transmission infrastructure. The protection of the natural character of the coastal environment need not preclude appropriate use and development where adverse effects can be avoided, remedied or mitigated. Meeting the foreseeable needs of future generations will require the provision of critical infrastructure essential to the community's economic and social wellbeing. The Wellington

Submitter	Submission	Summary
		<p>coastal environment has significant renewable energy resources and in particular any exceptional marine energy resources (tidal/ocean current resources). Marine energy may become increasingly important in meeting New Zealand's electricity demand in the future. The region also has significant wind energy potential. Wind energy is expected to meet a much greater share of the country's electricity than at present."</p> <p>Also sought an additional objective in Table 2 of: "to provide for appropriate subdivision, use and development of the coastal environment"</p> <p>Or</p> <p>"the region's nationally significant marine energy generation resource is recognised and promoted"</p>
F1/89	Winstone Aggregates	Support
F4/1	Transpower New Zealand Limited	Support
F8/4	TrustPower Limited	Support
F13/4	Wellington International Airport Limited	Support
F17/6	Meridian Energy Limited	Support
Transpower New Zealand Limited	123/5	<p>Sought:</p> <ul style="list-style-type: none"> A. Retain recognition of significant infrastructure, such as Centreport and the Cook Strait cable. B. Amend the Introduction to include specific recognition of transmission facilities. This could be achieved by amending paragraph 3 to the following effect: Significant infrastructure – such as Centreport, the Cook Strait Cable and other transmission infrastructure, and several state highways and rail corridors – is located within the coastal environment. C. Amend the Introduction by adding a final sentence in paragraph 4 to the following effect: Other National Policy Statements are also

Submitter	Submission	Summary
		relevant (refer to Section 1.3).
F13/5	Wellington International Airport Limited	Support
F17/7	Meridian Energy Limited	Support
TrustPower Limited	124/3	Sought retention of the reference to "significant wind and marine energy resource".
Paula Warren	128/1	Sought that the Regional Policy Statement take a strong position on the protection of aquatic and coastal environments and include stronger measures to prevent ongoing loss of coastal values. Noted that Porirua City Council and Greater Wellington have not adequately addressed the impact of land intensification, subdivision and past legacy of development in the Porirua harbour.
F15/3	Porirua City Council	Support
Wellington City Council	131/2	Supported the objectives, policies and methods relating to this topic, subject to consideration of policy 5. Also expressed concern about statement on page 20 which said "to date there has been no strategic approach planning in the region that has identified where public access should be enhanced. Stated that this was incorrect and that although there may not have been a region wide exercise, this had been addressed by Wellington City Council through the Open Space Access Plan.
Wellington International Airport Limited	134/2	Sought that the Wellington Airport be mentioned on page 19 as one of the items of significant infrastructure. Sought an expansion to the draft objectives and policies to include provision for future airport activities in the coastal environment.
F11/9	Paraparaumu Airport Limited	Support
Wellington Surf Riders Club Inc	137/1	Concerned with development in or near popular surfbreaks that impact on the wider community as a whole. Sought that recognition of the importance of surfbreaks and developments that may affect

Submitter	Submission	Summary
		them be taken into consideration with the proposed regional plan. Sought that Greater Wellington Regional Council recognise the emphasis placed on surfbreaks by the Board of Inquiry proposed New Zealand Coastal Policy Statement, in particular clause 20 of that statement, and submissions of the Surfbreak Protection Society Inc (attached to submission).
F13/6	Wellington International Airport Limited	Oppose

(a) Discussion

Recognition of activities

A number of submitters requested that there is more recognition in this section of the variety of legitimate uses and development in the coastal environment. They expressed concern that the discussion did not give enough emphasis to activities which, while they do not have a functional need to locate in the coastal environment, can nevertheless be appropriate.

CentrePort Wellington had concerns regarding the emphasis on preservation of natural character and the impact of defining the landward extent of the coastal environment, with reference to discouraging development in the coastal area. CentrePort Wellington wanted the positive aspects of coastal commercial developments (other than port activities) recognised and provided for when the public interest can be satisfied. Winstone Aggregates further supported this submission while Westfield New Zealand Ltd opposed it. Greater Wellington staff have altered the explanation to recognise these activities in the coastal environment.

CentrePort Wellington also sought the addition of a new issue to clarify that while some development and activities require a coastal location, other activities may also be appropriate in the coastal environment, provided that any adverse effects are avoided, remedied or mitigated. Greater Wellington recommends rejecting this point on the basis that it has not been identified as a regionally significant issue, however the appropriateness of activities in the coastal environment is given guidance by the Regional Policy Statement. NZ Transport Agency and Wellington International Airport Limited further supported CentrePort Wellington's submission.

Anders Crofoot wanted recognition of the economic purpose of farming in the coastal environment and recognition that pasture is a

highly managed man-modified land cover. Federated Farmers of New Zealand and Masterton District Council supported this submission. **Federated Farmers of New Zealand** and Anders Crofoot both sought that farming in the coastal environment be better recognised as a legitimate activity and that it be acknowledged that the pastoral landscape, which is valued as part of the coastal environment, has been created and is maintained by farming activities. Federated Farmers of New Zealand sought the inclusion of a new paragraph to recognise the private ownership of large areas of coastal land for primary production and that this is essential to the community's social, economic and cultural well being and therefore there should be a tolerance of adverse effects. Masterton District Council and Anders Crofoot further supported this submission.

Greater Wellington staff generally accept these comments from Federated Farmers of New Zealand and Anders Crofoot and recommend that the submission comments be incorporated into a new paragraph in the introduction to clarify the issues stated around farming. However, it should be noted that the resource consent process is the vehicle for determining the acceptability of adverse effects, and this issue is more appropriately dealt with in the plan review process.

The **NZ Transport Agency** and **Oil Companies** supported the reference to the important role of the region's infrastructure in the coastal environment, while **The Energy Efficiency and Conservation Authority**, **Mighty River Power** and **TrustPower Limited** supported the retention of the recognition of significant wind and marine energy resources in the region. Mighty River Power's submission was further supported by TrustPower Limited. Greater Wellington staff recommend that the committee note this support.

Further, the Energy Efficiency and Conservation Authority stated that there are significant renewable energy resources in the coastal marine area and the coastal environment and that the significant benefits of utilising these for energy supply should be recognised as an additional issue. Greater Wellington staff recommend that this point be rejected as it is covered in policy 38(b) which requires a decision maker to have particular regard to "the nationally significant wind and marine renewable energy resources within the region and the need for electricity generation facilities to locate where these resources exist". The Regional Policy Statement is an integrated document and the provisions in other chapters must also be considered in the coastal environment. Policy 38 (b) will continue even when policy 6 is given effect to in a relevant district or regional plan.

The Energy Efficiency and Conservation Authority also sought an additional issue in chapter 3, section 3.2 being "managing the appropriate subdivision, use and development of the coastal environment". They also requested a further objective in table 2 being "to provide for appropriate subdivision, use and development of the

coastal environment”, to highlight the appropriateness and importance of development of renewable energy in the coast. An alternative suggestion was “the region’s nationally significant marine energy generation resource is recognised and promoted”. This was further supported by Winstone Aggregates, Transpower New Zealand Limited, TrustPower Limited, Wellington International Airport Limited, while Meridian Energy Limited supported this submission in part provided that care is taken to refer to policy documents that have been finalised. As above Greater Wellington staff consider both of these proposed objectives are addressed in provisions in other sections and the benefits of renewable energy are not pre-eminent amongst other values. However, proposed changes to policy 35 do give further guidance as to what is appropriate subdivision, use and development in the coastal environment.

Transpower New Zealand Limited sought to retain the recognition of significant infrastructure such as the Centreport facility and Cook Strait cable and they also wanted to include the recognition of transmission facilities more generally. Meridian Energy Limited generally supported this submission while Wellington International Airport Limited supported Transpower New Zealand Limited’s submission on the inclusion of Wellington airport as an item of significant infrastructure in the coastal environment. Transpower New Zealand Limited also submitted that there are other national policy statements which may be relevant, as well as the New Zealand Coastal Policy Statement and requested a further sentence stating that. ‘...other National Policy Statements are also relevant’. Greater Wellington staff accept these additional points and have recommended inserting them into the appropriate places.

Wellington International Airport Limited wanted the airport to be mentioned on page 19 as an item of regionally significant infrastructure. This was further supported by Paraparaumu Airport Limited provided that Paraparaumu Airport and Hood Aerodrome are also listed as infrastructure of regional significance. Wellington International Airport is already included on a list of regionally significant infrastructure under the definition of ‘regionally significant infrastructure’ so Greater Wellington staff recommend rejecting this point. Staff note the items are only examples and the full list of significant infrastructure is recognised in the definition. Greater Wellington staff have recommended adding Hood Aerodrome to the list of infrastructure of regional significance but not Paraparaumu Airport. See the recommendations on policies 6, 7, and 38 for discussion.

Wellington International Airport Limited also sought objectives and policies that provide for further airport activities in the coastal environment. Greater Wellington staff also recommend rejecting this point as the objectives and policies in the Regional Policy Statement are to address regional issues and not specific future development opportunities.

Wellington Surf Riders Club Inc sought the recognition of the importance of surf breaks and wanted the adverse effects on them through development to be considered in the proposed regional plan. They also required Greater Wellington to recognise the emphasis placed on surf breaks by the Board of Enquiry for the proposed New Zealand Coastal Policy Statement. This submission was opposed by Wellington International Airport Limited on the basis that no one interest should be taken in preference to others. Greater Wellington staff recommend rejecting Wellington Surf Riders Club Inc's submission as it is considered that these points will be addressed as part of the review of the Greater Wellington Regional Coastal Plan.

Winstone Aggregates requested that Section 3.2 including relevant objectives, policies and methods be deleted, redrafted and re-notified to better reflect the balance required under the Resource Management Act 1991 and in the New Zealand Coastal Policy Statement and better recognise positive aspects of use and development in the coastal environment. Meridian Energy Limited opposed this submission. Greater Wellington staff consider that the Regional Policy Statement as proposed does reflect both the Act and the New Zealand Coastal Policy Statement and the objectives, policies and methods are effective and appropriate. Section 3.2 outlines many activities and some further recognition of uses and development in the coastal environment has been recommended above; staff recommend this submission is therefore accepted in part.

Winstone Aggregates wanted increased recognition of the functional need for some activities to be located in the coastal environment and CentrePort Wellington also expressed the desire to include a new issue to read "some infrastructure and activities require coastal locations". Greater Wellington staff consider the recognition of the functional need for some activities to be located in the coastal environment is expressed both in this section and others. Greater Wellington staff recommend rejecting the suggestion of a new issue as it does not address an issue identified as regionally significant and can be dealt with through the land-use consenting process.

Other matters

East Harbour Environmental Association Incorporated wanted the implications of sea-level rise emphasised in the coastal environment section of the Regional Policy Statement. Greater Wellington staff agree that this is a valid omission and recommend including a new paragraph at the end of the introduction that incorporates sea-level implications on new subdivision, use and development.

New Zealand Historic Places Trust wanted Greater Wellington to identify regionally significant coastal areas and develop a schedule to include as a variation to the proposed Regional Policy Statement. This was further supported by East Harbour Environmental Association Incorporated and Porirua City Council. Greater Wellington staff reject

this and make reference to policies 20, 22, 24, and 26 which may include the identification of regionally significant coastal areas and which will form part of the proposed review of the Regional Coastal Plan.

Kapiti Coast District Council requested that the proposed Regional Policy Statement be amended to include any changes to the proposed New Zealand Coastal Policy Statement. Porirua City Council further supported this while Horticulture New Zealand supported in part. Greater Wellington staff comment that this is not possible at this stage, as the extent of any changes to the proposed document are unknown. Greater Wellington staff are aware that, when the proposed New Zealand Coastal Policy Statement becomes operative, there may be a need to give effect to it through a variation (if the Regional Policy Statement is still proposed) or a plan change (if operative).

Kapiti Coast District Council also raised concerns with the discharge of contaminants affecting the coastal environment. They suggested that Greater Wellington should address this in conjunction with Horizons Regional Council. While Greater Wellington shares the concern about discharge of contaminants, Greater Wellington staff do not consider this an issue of regional significance but it will be assessed during the review of the regional plans.

Kapiti Coast District Council supported issues 1 to 4 and objectives 3 to 8. Greater Wellington staff recommend that the committee note this.

Porirua City Council supported the overall approach taken by the proposed Regional Policy Statement to maintain and enhance the coastal environment, but also sought that Porirua Harbour be explicitly recognised by the policies of the Regional Policy Statement to take account of its regional and national significance. Porirua City Council sought a new regulatory policy and method to specifically address Porirua Harbour and its catchments including stating the objectives that it would be implementing. Staff recommend that these comments from Porirua City Council should be accepted and that the provided policy and method be inserted to address integrated management of Porirua Harbour which is of national and regional significance. Kiwi Income Property Trust, Kiwi Income Properties Ltd and Kiwi Properties Management Ltd further submitted in support of Porirua City Council. Federated Farmers of New Zealand opposed in part as they wanted the proposed policy either retained as read or with the addition of explicit statements that the relationship of rural production and any effects on water quality be based on robust science, and to ensure extensive consultation with landowners and other stakeholders. Greater Wellington staff recommend retaining the submission from Porirua City Council as read as any catchment management programme will be based on robust science and will involve inclusive consultation.

Paula Warren sought that the Regional Policy Statement take a stronger position on the protection of aquatic and coastal environments and more adequately address the impact of land intensification, subdivision and development on the Porirua Harbour. This was further supported by Porirua City Council. Greater Wellington staff are recommending that a new policy and method be included to address the issues associated with Porirua Harbour and its catchments as this is a regionally significant issue for the Wellington region and requires integrated management.

South Wairarapa District Council and **Tararua Tramping Club** agreed with concerns regarding the discharge of contaminants that affect the coastal environment. The support of Tararua Tramping Club for the policies in this chapter is noted. South Wairarapa District Council also sought that the Regional Policy Statement should discourage medium/large-scale subdivision in coastal areas. This was further supported by East Harbour Environmental Association Incorporated. Greater Wellington staff consider that the changes to policy 3 and 35 which include giving criteria for determining high natural character and assessing effects of activities, together with the other policies in this section, will provide guidance on the appropriateness of subdivision and development, within the context of the primary purpose of the Act of promoting sustainable management.

The Energy Efficiency and Conservation Authority sought that the protection of natural character in the coastal environment not preclude appropriate use and development where adverse effects can be avoided, remedied or mitigated and the addition of a further issue to this effect. Case law has established that the preservation of natural character and the protection of natural character is subordinate to the primary purpose of the promotion of sustainable management (NZ Rail Ltd v Marlborough DC 1993 NZRMA 449). The wording of policies 3 and 35 has been amended to refer to the protection from 'inappropriate subdivision, use and development'. Greater Wellington staff do not consider a new issue necessary as this was not identified as a regionally significant issue in the review process.

Wellington City Council supported the objectives, policies and methods relating to the coastal environment but requested that Greater Wellington consider the proposed amendments to policy 5. The submitter also expressed concern about the statement on page 20 which said "to date there has been no strategic approach to planning in the region that has identified where public access should be enhanced. Greater Wellington staff recommend that the committee notes the support from Wellington City Council and refers to the amendments made to policy 5 which have accepted in part Wellington City Council's concerns. The concern expressed by the submitter about the comment on strategic planning is also acknowledged and it is recommended that a change be made referring to "region-wide strategic planning" in section 2.21 of this report.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/5	Accept in part
CentrePort Wellington	23/1	Accept
CentrePort Wellington	23/2	Reject
Anders Crofoot	25/5	Accept in part
East Harbour Environmental Association Incorporated	33/4	Accept
Federated Farmers of New Zealand	35/4	Accept in part
Kapiti Coast District Council	56/3	Reject
Mighty River Power	83/4	Accept
New Zealand Historic Places Trust	87/1	Reject
NZ Transport Agency	91/2	Accept
Oil Companies	92/1	Accept
Porirua City Council	100/2	Accept
South Wairarapa District Council	112/7	Accept
South Wairarapa District Council	112/8	Accept in part
Tararua Tramping Club	114/5	Accept
The Energy Efficiency and Conservation Authority	117/5	Accept in part
Transpower New Zealand Limited	123/5	Accept
TrustPower Limited	124/3	Accept
Paula Warren	128/1	Accept
Wellington City Council	131/2	Accept in part
Wellington International Airport Limited	134/2	Reject
Wellington Surf Riders Club Inc	137/1	Reject

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend paragraph 3 as follows:

As well as its cultural importance, the coastal environment is important to the regional community for recreation and general enjoyment. It is also the location of many activities and structures that require a coastal location. Significant infrastructure – such as Centreport, the Cook Strait cable and other transmission infrastructure, and several state highway and rail corridors – is located in the coastal environment. This infrastructure is essential to the community’s economic and social wellbeing. This region’s coastal environment also has significant wind and marine energy resources. There are also other commercial activities that may be appropriate in highly modified coastal areas.

Amend paragraph 4 as follows:

The Regional Policy Statement must give effect to the New Zealand Coastal Policy Statement, which provides a policy framework for both the wet and dry parts of the coastal environment. This framework recognises the ecological, geographical, cultural, social, and economic linkages between land and sea, and the complementary responsibilities that different authorities have for coastal management. Other National Policy Statements are also relevant.

Insert a new paragraph 6 as follows:

Much of the region’s coastal environment is in private ownership and is being actively farmed. This rural land use has had a significant impact on the coastal environment resulting in landscapes which are ‘modified but natural’ in the continuum of natural character. These pastoral landscapes are valued by people not only for their natural character (aesthetic appeal) but also by landowners for the economic benefits they derive from them. While farming activities have modified the coastal environment, these pastoral “working landscapes”, in some cases, have helped to prevent further more intensive development.

Insert a new paragraph at the end of the introduction as follows:

The implications of sea-level rise on the coastal environment also need to be considered when looking at the potential effects on new subdivisions, use and development.

Add a new policy to achieve objectives 3,5,6,7 and a new method plus proposed methods 1 and 2 to implement the policy, as follows:

Policy #: Recognising the regional and national significance of Porirua Harbour (including Pauatahanui Inlet and Onepoto Arm)

District and Regional Plans with jurisdiction over all or part of the Porirua Harbour catchment area shall include policies, rules and/or methods that:

(a) recognise and acknowledge the regional significance of Porirua Harbour; and

(b) recognise and provide for the maintenance, protection and enhancement of the significant amenity, recreational, ecological and cultural values associated with the Porirua Harbour.

Explanation

Porirua Harbour includes the Pauatahanui inlet and the Onepoto arm. Porirua Harbour contains a nationally significant ecosystem and has high cultural significance to Ngati Toa.

While the harbour is a recognised aesthetic, natural and community asset, parts of it have been significantly impacted by historic and current land and coastal management practices. The regulatory approach of the Regional Policy Statement seeks to address the discharge of sediment, nutrients and other contaminants into the harbour and its ecological health through regional and district plans. However, general regulatory policies cannot address the cross-boundary issues associated with the management of the harbour, and the need to address existing land management practices that are increasingly impacting the harbour.

A non-regulatory method is also necessary to address the issues that cannot be resolved through a regulatory approach, but that are vital in restoring the mauri and ecological health of the harbour. Further, the integrated and coordinated management of Porirua Harbour between Porirua City Council, Wellington City Council and Wellington Regional Council is vital to protecting and restoring the harbour.

Method #: Harbour and catchment management strategy for Porirua Harbour

Prepare a harbour and catchment management strategy for Porirua Harbour to address the restoration of Porirua Harbour and reduce the discharge of sediment, nutrients and contaminants into the harbour. Implementation: Wellington Regional Council, Porirua City Council and Wellington City Council.

2.18 Section 3.2 Coastal environment - Issue 1: Adverse effects on natural character of the coastal environment

Submitter	Submission	Summary
Anders Crofoot	25/6	Stated that natural character includes farmed landscape as well as native flora and fauna and as such the issue was overly broad. Stated that the issue needs to ensure that farmland is not captured, unless Greater Wellington is willing to pay for the provision of farmland as parkland.
F19/5	Horticulture New Zealand	Support
F23/10	Federated Farmers of New Zealand	Support
Federated Farmers of New Zealand	35/6	Sought deletion or amendment to focus on the real threats identified by council such as large scale earthworks for housing development and roads.
F22/18	Anders Crofoot	Support
F24/32	Masterton District Council	Support
Wellington Fish and Game Council	133/4	Supported the issues, policies and methods relating to the maintenance of the coastal environment throughout the Greater Wellington Region and sought that they be retained.

(a) Discussion

Anders Crofoot sought that farmland was not captured in the definition of natural character in the coastal environment. Horticulture New Zealand and Federated Farmers of New Zealand further supported this submission. Greater Wellington staff note case law has clearly established that there is a continuum of natural character in the coastal environment ranging from pristine to highly modified and this includes introduced natural components such as pasture (Natural Character Concept Development in New Zealand Planning Law and Policy, Environment Waikato 2000/4). This has been clarified in new paragraph 6 in the introduction section.

In relation to payment for ‘parkland’, Greater Wellington staff note the proposed Regional Policy Statement has been prepared to achieve the purpose of the Resource Management Act, which is to promote the sustainable management of natural and physical resources in the

region. The Resource Management Act does not have any provision for compensation for the perceived loss of landowner rights arising from provisions in the proposed Regional Policy Statement.

Federated Farmers of New Zealand requested that Greater Wellington delete or amend issue 1 to focus on the “real threats” identified, such as large-scale earthworks for housing development and roads. This submission was further supported by Anders Crofoot and Masterton District Council. Greater Wellington staff recommend that this point is accepted and have amended issue 1.

Wellington Fish and Game Council stated their support for the issues, policies and methods relating to the maintenance of the coastal environment throughout the Greater Wellington region and sought that they be retained. Staff have recommended retaining the issues, policies, and methods with some amendments in response to other submissions, detailed in the relevant report sections.

(b) Recommended decision

Submitter	Submission	Recommendation
Anders Crofoot	25/6	Reject
Federated Farmers of New Zealand	35/6	Accept
Wellington Fish and Game Council	133/4	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend issue 1 to read:

1. Adverse effects on the natural character of the coastal environment

The natural character of the region’s coastal environment has been, and continues to be, adversely affected by activities such as large-scale earthworks for housing developments and roads, changes in land use and the placement of structures.

2.19 Section 3.2 Coastal environment - Issue 2: Coastal water quality and ecosystems

Submitter	Submission	Summary
John Christopher Horne	49/5	Sought the addition of contaminants from the transport system.

Submitter	Submission	Summary
F1/41	Winstone Aggregates	Support and Oppose
F13/7	Wellington International Airport Limited	Oppose

(a) Discussion

John Christopher Horne sought that contaminants from the transport system be included under the explanation of issue 2. Greater Wellington staff consider that the use of the words “...and other contaminants...” already in the explanation would cover contaminants arising from transport systems. Winstone Aggregates further submitted to ensure that any amendments did not compromise the use of freight vehicles in the region and Wellington International Airport further submitted in opposition.

(b) Recommended decision

Submitter	Submission	Recommendation
John Christopher Horne	49/5	Reject

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

There are no changes to issue 2 recommended.

2.20 Section 3.2 Coastal environment - Issue 3: Human activities interfere with natural coastal processes

Submitter	Submission	Summary
Anders Crofoot	25/7	Stated that Issue 3(b) was based on the activity itself rather than the effects as in (a) and (c). Concerned that this made the issue overly broad and intrusive and consequently more costly. Stated that a policy should be developed around controlling adverse effects not activities.

(a) Discussion

Anders Crofoot stated that issue 3(b) was based on the activity instead of effects as in (a) and (c). He stated that the policy should be developed around controlling adverse effects not activities. Greater Wellington staff wish to clarify that the Regional Policy Statement does not include rules to control either adverse effects or activities.

The purpose of the Regional Policy Statement is to promote the sustainable management of natural and physical resources. Controlling effects and activities is the purpose of regional and district plans. To further clarify, Greater Wellington staff have recommended that policy 35 be reworded to better reflect the outcome sought, namely objective 4, which aims to protect the natural character of the coastal environment from adverse effects arising from inappropriate subdivision, use and development. A change in wording in the issue is therefore recommended.

(b) Recommended decision

Submitter	Submission	Recommendation
Anders Crofoot	25/7	Accept in part

(c) Recommended changes

Amend issue 3 as follows:

3. Human activities interfere with natural coastal processes

Human activities have modified and continue to interfere with natural physical and ecological coastal processes. For example:

- (a) Seawalls alter sediment movement along beaches and estuaries and can cause erosion problems in some areas and deposition problems in others
- (b) Sand dunes and dune vegetation ~~are being destroyed~~ can be significantly affected by inappropriate development, vehicles, and trampling by people and animals
- (c) Some land uses and earthworks can cause increased rates of sedimentation in low energy receiving environments, smothering aquatic life, for example in Porirua Harbour.

2.21 Section 3.2 Coastal environment & Section 3.4 Fresh water - Issue 4: Public access to and along the coastal marine area, lakes and rivers

Submitter	Submission	Summary
CentrePort Wellington	23/3	Sought that be amended by adding 'There are circumstances where the taking of access strips and esplanade reserves is not appropriate for health, safety or security reasons. Port operational areas are such an example.

Submitter	Submission	Summary
F13/8	Wellington International Airport Limited	Support
F23/11	Federated Farmers of New Zealand	Support in part
Anders Crofoot	25/8	Stated that the issue was overly broad, as access everywhere is not practical. Noted that access issues should only be addressed where there is a demonstrated public need and cost justifiable benefit.
F23/12	Federated Farmers of New Zealand	Support
Federated Farmers of New Zealand	35/7	Sought Coastal Environment Issue 4 be amended as follows: "Where a need exists public access to and along the coastal marine area, lakes and rivers should be facilitated in a manner that protects their natural character and the property rights of adjoining landowners"
F22/19	Anders Crofoot	Support
John Christopher Horne	49/6	Sought reference to the proposed coastal trail and that the objectives be changed accordingly.
Tararua Tramping Club	114/6	Sought that the Statement correctly describe the matter of national importance by inserting "and enhancement" before "of public access to". Agreed that access is not always possible if access ways are not well maintained and that represents an issue in terms of this matter of national importance. Noted that in many cases lesser and even no maintenance does not actually prevent access and concerns over maintenance should not count against establishing a right of access nor lead to one being removed. Agreed that one issue is that some legal access "is not always aligned with access that is physically possible" but that the Statement does not seem specifically to address this issue. Sought that esplanade reserves, or failing that, strips, should always be taken when the Act allows, unless some more practical and useful guaranteed access is

Submitter	Submission	Summary
		offered as an alternative.
F23/13	Federated Farmers of New Zealand	Oppose
Wellington Fish and Game Council	133/5	Supported

(a) Discussion

CentrePort Wellington sought that section 3.2 be amended by adding ‘There are circumstances where the taking of access strips and esplanade reserves is not appropriate for health, safety or security reasons’. The submitter stated that port operational areas were such an example. The submission was supported by Wellington International Airport Limited and Federated Farmers of New Zealand (in part). Greater Wellington staff note that policy 52 refers to situations where public access may need to be restricted. It is appropriate to include a similar qualification in the introductory comments on public access.

Anders Crofoot stated that the issue was overly broad, as access everywhere is not practical. He noted that access issues should only be addressed where there is a demonstrated public need and cost justifiable benefit. The submission was supported by Federated Farmers of New Zealand. Greater Wellington staff don’t disagree with the submitter. Public access is a complex issue covered by various jurisdictions, including the Resource Management Act which Greater Wellington is required to implement. Implementation of public access provisions of the Resource Management Act includes section 6 (d) ... *recognise and provide for ... the maintenance and enhancement of public access to and along the coastal marine area, lakes and rivers* and giving effect to four policies in the New Zealand Coastal Policy Statement that place a strong emphasis on providing public access. Greater Wellington staff consider that a broad approach is appropriate in the Regional Policy Statement and practical approaches that work and do not compromise property rights will be needed on a case by case basis.

Federated Farmers of New Zealand sought coastal environment issue 4 be amended to

“Where a need exists public access to and along the coastal marine area, lakes and rivers should be facilitated in a manner that protects their natural character and the property rights of adjoining landowners”. The submission was supported by Anders Crofoot. Greater Wellington staff comment that the issue suggested by the submitter sets out a course of action (policy) rather than an issue

relating to natural or physical resources. The issue as stated targets what the Resource Management Act specifically requires local authorities to address, namely consideration of esplanade reserves and access strips when subdivision occurs. It is recommended that the issue remain. Staff do, however, recommend recognition of the property rights of landowners regarding access to private land that does not contain an esplanade reserve or strip in the introduction.

John Christopher Horne sought reference to the proposed coastal trail and that the objectives be changed accordingly. Greater Wellington staff consider that reference to a single specific example when identifying region-wide issues is not an appropriate approach for the Regional Policy Statement to take.

Tararua Tramping Club sought that the Regional Policy Statement insert "and enhancement" before "of public access to". The submission was opposed by Federated Farmers of New Zealand. Greater Wellington staff note that the insertion reflects section 6(d) of the Resource Management Act and this change is recommended. The submitter agreed that some legal access "is not always aligned with access that is physically possible" but stated that the Regional Policy Statement does not seem specifically to address this issue. Greater Wellington staff consider that alignment with what is physically possible is part of the issue in relation to inconsistent approaches across the region to taking access strips and esplanade reserves, which policy 52 and method 50 aim to address. Tararua Tramping Club also sought that esplanade reserves, or failing that, strips, should always be taken when the Act allows, unless some more practical and useful guaranteed access is offered as an alternative. Greater Wellington staff note that the taking of access strips in specific circumstances lies with city and district councils.

Wellington Fish and Game Council supported issue 4. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
CentrePort Wellington	23/3	Accept
Anders Crofoot	25/8	Accept in part
Federated Farmers of New Zealand	35/7	Accept in part
John Christopher Horne	49/6	Reject
Tararua Tramping Club	114/6	Accept in part
Wellington Fish and Game Council	133/5	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

In response to submissions on public access and as a consequence of Wellington City Council's submission on section 3.2, amend the second paragraph on page 20 as follows:

The maintenance and enhancement of public access to and along the coastal marine area is another matter of national importance in the Resource Management Act. Where land is publicly owned, public access can be enhanced by providing walking tracks and recreational areas. Where land is privately owned, city and district councils can take esplanade reserves or strips as part of subdivisions. On private land that is not proposed to be subdivided, however, public access is at the discretion and with the permission of the landowner. To date, there has been no region-wide strategic planning in the region that has identified where public access should be enhanced. Where esplanade reserves and strips have been taken for public access, city and district councils sometimes struggle to maintain them. Even where there is legal access, it is not always aligned with access that is physically possible. There are circumstances where public access to the coastal marine area, lakes and rivers may not be not desirable – such as to provide security for regional infrastructure and prevent harm to the public.

In response to submissions on public access and as a consequence of Wellington City Council's submission on section 3.2, amend the last paragraph on page 34, as follows:

Where land is privately owned, city and district councils can take esplanade reserves or strips as part of subdivisions. On private land that is not proposed to be subdivided, however, public access is at the discretion and with the permission of the landowner. To date, there has been no region-wide strategic planning in the region that has identified where public access should be enhanced. Where esplanade reserves and strips have been taken for public access, city and district councils sometimes struggle to maintain them. Even where there is legal access, it is not always aligned with access that is physically possible. There are circumstances where public access to the coastal marine area, lakes and rivers may not be not desirable – such as to provide security for regional infrastructure and prevent harm to the public.

Amend the heading for issue 4 in section 3.2 as a consequence of the submission by CentrePort on section 3.4:

4 Public access to and along the coastal marine area, lakes and rivers (shared with Issue 4 in section 3.4)

Amend the heading issue 4 in section 3.4 as a consequence of the submission by CentrePort on section 3.4:

4 Public access to and along the coastal marine area, lakes and rivers (shared with Issue 4 in section 3.2)

2.22 Objective 3

Submitter	Submission	Summary
Anthony Roy Edwards	34/1	Sought reinstatement of "scientific" in the list of values to be protected. Stated that it needs to be included to cover "natural science" content of policies 24, 25 and 26.
Federated Farmers of New Zealand	35/8	Sought the deletion of objective 3 And Consequential amendments as to detail or substance throughout the Policy Statement, in particular the policy and method sections, to give effect to this relief sought
F22/20	Anders Crofoot	Support
Meridian Energy Limited	82/1	Requested combining with objective 4 to read: The natural character of the coastal environment and wetlands, lakes and rivers and their margins, outstanding natural features and landscapes, significant indigenous vegetation and significant habitats of indigenous fauna within the coastal environment are protected from the adverse effects of inappropriate subdivision, use and development.' Or alternatively amend objective 3 to read: The natural character of the coastal environment, wetlands, lakes and rivers and their margins, outstanding natural features and landscapes, significant indigenous vegetation and significant habitats of indigenous fauna within the coastal environment are protected from the adverse effects of inappropriate subdivision, use, and development.
F1/54	Winstone Aggregates	Support
F8/5	TrustPower Limited	Support

Submitter	Submission	Summary
F13/9	Wellington International Airport Limited	Oppose in part
F26/7	Mighty River Power	Support
F23/14	Federated Farmers of New Zealand	Support in part
F24/73	Masterton District Council	Support
New Zealand Historic Places Trust	87/2	Sought retention of objective 3.
Oil Companies	92/2	Sought that objective 3 be amended to refer to the protection of the values of habitats and features from inappropriate use and development. This could be achieved by making amendments with the following effect: Habitats and features in the coastal environment are protected from inappropriate use and development because of their significant indigenous biodiversity, recreational, cultural, historical, or landscape values
F8/6	TrustPower Limited	Support
F13/10	Wellington International Airport Limited	Support
F23/15	Federated Farmers of New Zealand	Support in part
Pauatahanui Inlet Community Trust	95/1	Requested the inclusion of policy 3 from the draft Regional Policy Statement
Transpower New Zealand Limited	123/6	Sought that objective 3 be amended to include reference to the protection of the values of habitats and features from inappropriate use and development. This could be achieved by making amendments to the

Submitter	Submission	Summary
		following effect: Habitats and features in the coastal environment are protected from inappropriate use and development because of their significant indigenous biodiversity, recreational, cultural, historical, or landscape values.
F8/7	TrustPower Limited	Support
F13/11	Wellington international Airport Limited	Support
F23/16	Federated Farmers of New Zealand	Support in part
TrustPower Limited	124/4	Sought that be amended to read: A number of habitats and features in the coastal environment are protected because of their significant indigenous biodiversity, recreational, cultural, historical, or landscape values
F13/12	Wellington International Airport Limited	Oppose in part
F23/17	Federated Farmers of New Zealand	Support
Wellington City Council	131/47	Supported objective 3

(a) Discussion

Anthony Roy Edwards sought that the term “scientific” should be reinserted into the list of values to be protected in order to cover the “natural science” content of policies 24, 25 and 26. Greater Wellington staff consider that the objective is implemented through the policies listed and others and that those policies recognise ‘scientific’ as a component of the values that they are identifying and protecting.

Federated Farmers of New Zealand sought the deletion of objective 3 and consequential amendments on the grounds that the Act does not require unqualified protection, but protection from inappropriate subdivision, use and development. The submission was supported by Anders Crofoot. Greater Wellington staff recommend that this

submission be rejected, as objective 3 does not provide unqualified protection. The wording of the objective relates to significant values. The policies that give effect to objective 3 relate to the protection of significant, high or outstanding features/amenity, and do not require unqualified protection. Further, the Act only qualifies the protection in the manner that the submitter asserts in s 6(b)-outstanding natural features and landscapes and s 6(f) -historic heritage.

Meridian Energy Limited requested that objective 3 should be combined with objective 4 or amended to add ‘inappropriate’. Wellington International Airport Limited partly opposed the submission from Meridian Energy Limited and suggested that the changes requested are better addressed by other submitters being 92/2 and 123/6. The submission was supported in part by Federated Farmers of New Zealand who as an alternative to adding the word ‘inappropriate’, asked for the deletion of objective 3. **Oil Companies** and **Transpower New Zealand Limited** also suggested the word ‘inappropriate’ before ‘subdivision, use and development’. This was also supported in part by Federated Farmers of New Zealand. Use of the word ‘inappropriate’ before subdivision, use and development was further supported by Winstone Aggregates, TrustPower Limited, Mighty River Power, Wellington International Airport Limited and Masterton District Council.

Greater Wellington staff recommend that these submission points are rejected as objective 3 is considering individual matters from sections 6 and 7, and these matters do not all have the qualifier of protection from “inappropriate subdivision, use and development”. Objective 4 addresses the protection of natural character which is underpinned by the primary components of natural processes, elements and patterns. There may be specific values as expressed in objective 3, but objective 4 addresses how these values contribute to natural character not the protection of the values listed per se. Objectives 3 and 4 have different outcomes, so combining them is not appropriate.

New Zealand Historic Places Trust sought the retention of objective 3. Greater Wellington staff recommend that the committee notes this.

Pauatahanui Inlet Community Trust requested the inclusion of policy 3 from the draft Regional Policy Statement. Staff recommend that this point is rejected. It was considered during the review of the draft Regional Policy Statement that it was more effective to identify and protect the individual elements such as indigenous biodiversity, landscape and heritage and then their contribution to natural character, rather than regionally significant sites.

TrustPower Limited sought the inclusion of the words “a number of habitats and features...”. This was opposed in part by Wellington International Airport Limited who suggested that more valid points are given by Oil Companies and Transpower New Zealand Limited. Federated Farmers of New Zealand further supported this submission.

Greater Wellington staff have rejected this submission point as it is clear from the policies that give effect to objective 3 that they identify those of significant, high or outstanding value as opposed to complete protection. Objective 4 gives more specific direction for protection of the natural character of the coastal environment as does the New Zealand Coastal Policy Statement.

Wellington City Council supported objective 3. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Anthony Roy Edwards	34/1	Reject
Federated Farmers of New Zealand	35/8	Reject
Meridian Energy Limited	82/1	Reject
New Zealand Historic Places Trust	87/2	Accept
Oil Companies	92/2	Reject
Pauatahanui Inlet Community Trust	95/1	Reject
Transpower New Zealand Limited	123/6	Reject
TrustPower Limited	124/4	Reject
Wellington City Council	131/47	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

There are no recommended changes to objective 3.

2.23 Objective 4

Submitter	Submission	Summary
Meridian Energy Limited	82/2	Sought retention as proposed or in combination with objective 3 as requested in earlier submission.
Mighty River Power	83/5	Sought retention.
New Zealand	87/3	Sought retention of objective 4.

Submitter	Submission	Summary
Historic Places Trust		
Oil Companies	92/3	Sought retention of objective 4 without modification
South Wairarapa District Council	112/9	Stated concerns about ongoing coastal development along the Wairarapa Coast eroding environmental and amenity values and strongly supported objective 4
Transpower New Zealand Limited	123/7	Sought retention of objective 4 without modification.
Wellington City Council	131/48	Supported objective 4

(a) Discussion

Meridian Energy Limited sought that objective 4 be retained as proposed or be combined with objective 3. However as discussed under objective 3 (above), Greater Wellington staff conclude that objective 4 is directed towards the protection of natural character in the coastal environment, while objective 3 is directed towards the protection of the significant values in the coastal environment. Greater Wellington staff therefore recommend retaining objective 4.

Mighty River Power, New Zealand Historic Places Trust, Oil Companies, South Wairarapa District Council, Transpower New Zealand Limited and **Wellington City Council** all support and/or sought the retention of objective 4. Staff note the support and recommend retaining the objective as proposed.

(b) Recommended decision

Submitter	Submission	Recommendation
Meridian Energy Limited	82/2	Accept in part
Mighty River Power	83/5	Accept
New Zealand Historic Places Trust	87/3	Accept
Oil Companies	92/3	Accept
South Wairarapa District Council	112/9	Accept

Submitter	Submission	Recommendation
Transpower New Zealand Limited	123/7	Accept
Wellington City Council	131/48	Accept

(c) Recommended changes

There are no recommended changes to objective 4.

2.24 Objective 5

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/9	Sought objective 5 be amended as follows (or words to this effect): Areas of the coastal environment where natural character has been significantly degraded are restored and rehabilitated where appropriate
F1/28	Winstone Aggregates	Support
F22/21	Anders Crofoot	Support
F24/33	Masterton District Council	Support
Horticulture New Zealand	50/6	Sought deletion of objective 5. Stated that the objective seeks to restore degraded areas of the coastal environment which is not a Section 6 matter. As a high level objective this could lead to a wide range of activity and debate on what is degraded and in need of repair. There should be far greater guidance as to how priorities and focus should be established, rather than applying a blanket objective across the whole region.
F22/22	Anders Crofoot	Support
F24/55	Masterton District Council	Support
Masterton District Council	74/1	Sought that objective 5 be amended, by deleting the words restored and rehabilitated, to read maintained and enhanced, which will reflect the wording of s6 of the Resource Management Act 1991.

Submitter	Submission	Summary
F23/18	Federated Farmers of New Zealand	Support
New Zealand Historic Places Trust	87/4	Sought retention of objective 5.
South Wairarapa District Council	112/10	Sought amendments to clarify that the aim is to target significantly degraded areas or 'inadvertently degraded' and not to restore instances of degradation that occur as a result of activities that legally occur under Resource Management Act 1991 consents. Also sought more definition on what "degraded and in need of repair means".
F1/85	Winstone Aggregates	Support
F23/19	Federated Farmers of New Zealand	Support
Wellington City Council	131/49	Supported objective 5

(a) Discussion

Horticulture New Zealand sought the deletion of objective 5 as they believed that objective 5 is not a section 6 matter. This was further supported by Masterton District Council. The submission of Horticulture New Zealand was supported by Anders Crofoot. Greater Wellington staff recommend that this submission point be rejected as this objective is potentially a section 7 matter in the Resource Management Act 1991 and is furthermore supported only by a non-regulatory policy. As the commentary to the Act states:

“..... although s 6 makes it a matter of national importance to provide for “the preservation of the natural character”, the provision does not contemplate the reinstatement of a degraded environment, nor elevate enhancement activities to the status of national importance: *Auckland Volcanic Cones Soc Inc v Transit NZ Ltd* [2003] NZRMA 54 (EnvC). In any case, reinstatement and enhancement are probably caught within s 7(c), (f), and (g), with its lower requirement to have “particular regard”.” (Brookers Commentary Resource Management A6.04f)

Federated Farmers of New Zealand sought that objective 5 be amended to read “areas of the coastal environment where natural character has been significantly degraded are restored and rehabilitated where appropriate”. This was further supported by Anders Crofoot, Winstone Aggregates and Masterton District Council. Horticulture New Zealand and South Wairarapa District Council were also concerned about the subjective nature of the objective and the lack of guidance on priorities. Masterton District Council further supported Horticulture New Zealand. Greater Wellington staff acknowledge that the word ‘degraded’ is not defined in the Regional Policy Statement, but the addition of the qualifiers suggested by the submitter does not decrease the subjective nature of the objective. Greater Wellington staff direct the submitters to the common usage of the term ‘degrade’ in relation to the environment which is ‘to cause damage or destruction to part of the environment as a result of human activity’ (Encarta Dictionary). This requires a much stronger test for action than if an environment is ‘modified’, for example by farming activities. Common use interpretation would allay submitters’ concerns that restorative actions would be required on potentially all areas of the coastal environment.

Further, the addition of the qualifying words requested or other qualifiers is not recommended as this objective is supported only by a non-regulatory policy. There is no ability to require actions under the objective, though it acknowledges that there are a number of non-regulatory actions which can be taken to restore and rehabilitate degraded environments. These will have their own constraints which will lead to the prioritising of enhancement initiatives. There is no landowner responsibility inherent in policy 64 or the explanation for this policy.

South Wairarapa District Council also wanted it clarified that the aim is not to restore degradation that occurred as a result of activities which legally occur under resource management consents. Winstone Aggregates and Federated Farmers of New Zealand further supported this submission. We would like to point the submitter to paragraph 2 in the explanation to policy 64 where this submission point has been addressed.

Masterton District Council sought that objective 5 be amended, by replacing the terms “restored and rehabilitated” with “maintained and enhanced” to reflect the wording of section 7 of the Resource Management Act 1991. This was further supported by Federated Farmers of New Zealand. The wording used is taken from the New Zealand Coastal Policy Statement Policy 1.1.5 and Greater Wellington staff consider that the wording is appropriate and should remain. Restore and rehabilitate looks at the degraded parts of an ecosystem and ways to improve the current situation, rather than maintaining what could be a seriously degraded environment. The objective is supported by methods 8 and 52 which provide information to assist with restoration and supporting community restoration initiatives.

New Zealand Historic Places Trust sought the retention of objective 5. **Wellington City Council** supported objective 5. Greater Wellington staff recommend that the committee notes this.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/9	Reject
Horticulture New Zealand	50/6	Reject
Masterton District Council	74/1	Reject
New Zealand Historic Places Trust	87/4	Accept
South Wairarapa District Council	112/10	Reject
Wellington City Council	131/49	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

There are no recommended changes to objective 5.

2.25 Objective 7

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/10	Sought objective 7 be amended as follows: The integrity, functioning and resilience of physical and ecological processes in the coastal environment are protected from the adverse effects of inappropriate subdivision, use and development.
F1/29	Winstone Aggregates	Support
F22/23	Anders Crofoot	Support
F24/34	Masterton District Council	Support
Meridian Energy Limited	82/3	Sought that the objective be amended to read 'The integrity, functioning and resilience of physical and ecological processes in the coastal environment are protected from the adverse effects of inappropriate subdivision, use and development.' or other amendments to ensure focuses on protection of inappropriate subdivision, use and development.

Submitter	Submission	Summary
F16/5	Genesis Energy	Support
F26/8	Mighty River Power	Support
F23/20	Federated Farmers of New Zealand	Support
F24/74	Masterton District Council	Support
Wellington City Council	131/50	Supported objective 7

(a) Discussion

Federated Farmers of New Zealand and Meridian Energy Limited sought that objective 7 be amended to read “the integrity, functioning and resilience of physical and ecological processes in the coastal environment are protected from the adverse effects of inappropriate subdivision, use and development. This was also supported by Winstone Aggregates, Masterton District Council, Anders Crofoot, Genesis Energy, Mighty River Power and Federated Farmers of New Zealand. Greater Wellington staff recommend that this submission point be rejected as the subject matter in objective 7 and policy 36 involves ecosystems or ecological processes which are relevant to section 6(c) of the Act. Section 6(c) does not include the qualifier of “inappropriate” and is therefore not warranted in this case.

Wellington City Council supported objective 7. The submitter’s support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/10	Reject
Meridian Energy Limited	82/3	Reject
Wellington City Council	131/50	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

There are no recommended changes.

2.26 Objective 8

Submitter	Submission	Summary
CentrePort Wellington	23/4	Sought that the objective be amended to read: 'Public access to and along the coastal marine area, lakes and rivers is enhanced except where for reasons of health, safety and security this can not be practically achieved.'
F13/13	Wellington International Airport Limited	Support
F23/21	Federated Farmers of New Zealand	Support
Korokoro Environment Group	65/1	Sought retention as is.
Masterton District Council	74/2	Sought that objective 8 be altered to provide for the exclusion of the public from areas surrounding or alongside public infrastructure where the security of that infrastructure could be compromised. E.g. water supply intakes and reservoirs and wastewater treatment plants.
F13/14	Wellington International Airport Limited	Support
New Zealand Historic Places Trust	87/5	Sought retention of objective 8.
Wellington Fish and Game Council	133/6	Supported along with policy and methods.
Wellington City Council	131/51	Supported objective 8

(a) Discussion

CentrePort Wellington sought that the objective be amended to read: 'Public access to and along the coastal marine area, lakes and rivers is enhanced except where for reasons of health, safety and security this can not be practically achieved.' The submission was supported by Wellington International Airport Limited and Federated Farmers of

New Zealand. Greater Wellington staff comment that an overall long term objective for the region to enhance public access is appropriate. The need to recognise limitations in relation to health safety and security in location specific instances is appropriate and this is mentioned in policy 52.

Korokoro Environment Group sought retention of the objective as is. Greater Wellington staff recommend retaining the objective as proposed.

Masterton District Council sought that objective 8 be altered to provide for the exclusion of the public from areas surrounding or alongside public infrastructure where the security of that infrastructure could be compromised. E.g. water supply intakes and reservoirs and wastewater treatment plants. The submission was supported by Wellington International Airport Limited. Greater Wellington staff comment that an overall long term objective for the region to enhance public access is appropriate. The need to recognise limitations in relation to regionally significant infrastructure is appropriate and this is provided for in policy 52.

New Zealand Historic Places Trust sought retention of objective 8. Greater Wellington staff recommend retaining the objective as proposed.

Wellington Fish and Game Council and **Wellington City Council** supported objective 8. The submitters support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
CentrePort Wellington	23/4	Reject
Korokoro Environment Group	65/1	Accept
Masterton District Council	74/2	Reject
New Zealand Historic Places Trust	87/5	Accept
Wellington Fish and Game Council	133/6	Accept
Wellington City Council	131/51	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

No changes are recommended to objective 8.

2.27 Section 3.3 Energy, infrastructure and waste

Submitter	Submission	Summary
Winstone Aggregates	15/6	Sought the addition of the following additional paragraph into the background to the issues: Resource unavailability or inefficiencies in obtaining such resources (such as aggregates, steel), required to construct and maintain such infrastructure can detrimentally impact upon the development, management, use and maintenance of such infrastructure. This has the potential to significantly impact on the timely provision of regionally significant infrastructure and in particular new roading projects necessary to achieve a productive and vibrant Wellington economy.
Department of Corrections	32/2	Sought that the terms 'social infrastructure' and 'essential social infrastructure', or similar terminology, be defined in the Regional Policy Statement and are explicitly referenced where possible with descriptions, issues, or explanatory statements throughout the relevant parts of the Regional Policy Statement and are incorporated into objectives and policies. Also sought that additional objectives and policies, similar to objective 10 and policies 6, 7 and 38 are included in the Regional Policy Statement to recognise the social, economic and cultural and environmental benefits of social infrastructure, and to provide for the protection of social infrastructure through district and regional plans, including policies and rules that protect social infrastructure from incompatible new land uses or activities.
F1/23	Winstone Aggregates	Oppose in part
F25/1	New Zealand Defence Force	Support
Higgins Group Holdings Ltd	48/2	Sought retention of section 3.3 but that a cross reference to the relevant provisions of section 3.1, 3.4 and 3.11 in order to ensure that the role of aggregates extraction and processing is recognised and provided for as integral to the provision of infrastructure. Also sought that recognition of the need to provide for the disposal of clean fill as an element of regional waste management, within policy 65 or where otherwise appropriate be provided.

Submitter	Submission	Summary
F1/37	Winstone Aggregates	Support
John Christopher Horne	49/7	Sought reference to peak oil and the need to future proof the region against the impacts of future oil prices and the availability of finite fossil fuels.
John Christopher Horne	49/8	Sought reference to the Kyoto Protocol and its successor and the IPCC.
F19/6	Horticulture New Zealand	Oppose
Horticulture New Zealand	50/7	Sought Council ensure that the Regional Policy Statement limits consideration of climate change matters to those that are required to be addressed at a regional level.
F22/24	Anders Crofoot	Support
Linda Hoyle	51/1	Sought for section 3.3 to be rewritten to take into account the government's energy policy, which centres on security of supply and affordable power generation. Submitter felt that statements regarding renewable energy's (i.e. wind generation) ability to meet these policies are incorrect and misleading to the general public and believed that Transpower should have been consulted to obtain more correct information.
F17/8	Meridian Energy Limited	Oppose
Kapiti Coast District Council	56/4	Supported the issues identified on page 29 of the proposed Regional Policy Statement in particular: <ul style="list-style-type: none"> • concerns about changes in energy supply sources and issues of responding to this change; • providing greater opportunities for the use of renewable energy particularly in relation to wind power and solar energy; and • concerns about dealing with wastes. Supported the intent of objective 9 and associated policies 6, 8-10, 38, 56 and 65 in relation to energy and emissions reduction, particularly noting the focus on transport emissions. Supported objectives 10 and 11 and intent of the associated policies. Requested that the proposed Regional Policy Statement emphasises that a

Submitter	Submission	Summary
		regional waste management strategy is desirable and needs to consider whether a regional landfill is appropriate.
F11/1	Paraparaumu Airport Limited	Oppose
F23/22	Federated Farmers of New Zealand	Support in part
Meridian Energy Limited	82/4	Sought that paragraph 2 be amended to acknowledge Project West Wind in addition to the energy generation facilities listed.
Mighty River Power	83/6	Sought retention of the resource management issues addressed in section 3.3 and the objectives 9 and 10 subject to amendments requested in submission.
NZ Transport Agency	91/3	Requested that the paragraphs relating to infrastructure on page 28 be expanded to provide better recognition of the important role that infrastructure plays and the associated resource management issues. Each infrastructure activity should be discussed in a separate paragraph and it should be specifically noted that regionally significant infrastructure can have adverse environmental impacts and the benefits of such infrastructure and the effects on the environment need to be balanced and managed appropriately.
F1/81	Winstone Aggregates	Support and oppose
F4/2	Transpower New Zealand Limited	Support
F5/4	PowerCo Limited	Support
F7/1	Oil Companies	Support
F13/15	Wellington International Airport Limited	Support
F17/9	Meridian Energy Limited	Oppose

Submitter	Submission	Summary
F20/32	Westfield New Zealand Ltd	Support
Paraparaumu Airport Ltd	94/1	The submitter sought appropriate recognition of Paraparaumu Airport as a regionally significant item of infrastructure and consequential changes to the Regional Policy Statement to that effect.
Preserve Pauatahanui Incorporated	101/1	<p>Stated renewable energy generation is a national issue not a regional issue.</p> <p>Traditional energy sources can meet demands for the foreseeable future, so the statement regarding this is incorrect.</p> <p>Climate change impacts from the region are so small that they should be a minor concern.</p> <p>Supported research into renewable generation technology and agree that some technology is underutilised but it is currently uneconomic.</p> <p>Supported a goal of ensuring that electricity is able to be distributed securely to and around the region whilst minimising the impact on the environment.</p>
F17/10	Meridian Energy Limited	Oppose
F23/23	Federated Farmers of New Zealand	Support in part
South Wairarapa District Council	112/11	<p>Questioned whether the second paragraph was accurate. Asked about relevance of the Meridian Energy wind turbine behind the Karori Sanctuary, and the wind farm at Makara.</p> <p>Noted that first paragraph "... small scale renewal energy generation..." possibly needs to mention individually owned or community owned wind generation.</p> <p>Sought that as well as mentioning that land development can encroach on infrastructure, the Regional Policy Statement needed to mention that infrastructure expansion should be planned appropriately to allow for development.</p> <p>Stated that the first sentence is obscure. Suggested wording: Infrastructure provides communities with essential services therefore should not be compromised by inappropriate land use or development.</p> <p>Sought inclusions of comment on the benefits derived from regional cooperation with waste</p>

Submitter	Submission	Summary
		<p>management for example the Waste Minimisation Plan that was implemented by the three Wairarapa Councils.</p> <p>Stated that if wind generation is not managed in a sustainable way both environmentally and socially then it may be contrary to section 5 of the Resource Management Act 1991.</p>
F17/11	Meridian Energy Limited	Oppose
F23/24	Federated Farmers of New Zealand	Support in part
Diane and Mike Strugnell	113/2	<p>Supported policies that improve energy efficiency and conservation.</p> <p>Opposed references to renewable energy, as this should only be considered in a national context.</p> <p>More regard should be given to landscape, social and health impacts, and amenity values, with more emphasis on what Wellington can do effectively.</p>
F26/49	Mighty River Power	Oppose
F23/25	Federated Farmers of New Zealand	Support
The Energy Efficiency and Conservation Authority	117/6	<p>Sought amendment to section 3.3 as follows:</p> <p>"In 2009, the Hau Nui wind farm, near Martinborough, a small hydro generation site at Kourarau Dam near Gladstone in the Wairarapa, two landfill gas generation plants at the Silverstream and Wellington City Southern landfill, and the West Wind wind farm in Makara were the only energy generation sites in the Wellington region. There are also a number of proposed wind farm developments in the region at Mill Creek, Long Gully and Puketiro. Resource consent has been granted for a marine energy in Cook Strait."</p> <p>"There is also the challenge of reducing greenhouse gas emissions from fossil fuels to meet international climate change obligations. In recent years New Zealand's emission levels have continued to increase. For example carbon dioxide electricity related emissions have almost doubled over the past 17 years.</p> <p>The region faces several major long-term energy challenges, including responding to climate change</p>

Submitter	Submission	Summary
		<p>and tackling carbon emissions, especially from transportation and electricity generation. Other challenges are securing clean, renewable energy at affordable prices and using it efficiently, as well as responding to impacts on the region from oil depletion and the rising costs of oil."</p> <p>"The New Zealand Energy Strategy (2007), the New Zealand Energy Efficiency and Conservation Strategy (2007 including the target of 90% renewable electricity by 2025, and the New Zealand Transport Strategy (2008) outline New Zealand's actions on energy and climate change."</p> <p>"The region contains significantly greater renewable energy resources than are currently used. Wind, biofuels, biomass, marine and solar (for hot water systems), have been identified as possible renewable energy generation sources for the region. There is also the potential for small-scale renewable energy generation including small-scale hydro in the region. Tidal and ocean currents in Cook Strait and, to a lesser extent, wave action in Cook Strait and off the Wairarapa coast are also significant renewable energy resources. New Zealand has limited locations appropriate for marine energy development and the Cook Strait has one of the best tidal/ocean current resources in the country. The Wellington region is likely to be one of the first locations of larger-scale tidal/ocean current generation in New Zealand over the next 3 – 7 years."</p> <p>"Infrastructure</p> <p>The transport network, airports, the port, telecommunication facilities, the rail network and other utilities and other infrastructure, including energy generation and transmission and distribution networks, are significant physical resources. This infrastructure forms part of nationally or regionally significant infrastructure and networks that enables communities to provide for their social, economic, and cultural wellbeing and their health and safety."</p>
F17/12	Meridian Energy Limited	Support in part
F23/26	Federated Farmers of New Zealand	Support in part
Transpower New Zealand	123/8	Sought: A. Retain the recognition of the benefits of

Submitter	Submission	Summary
Limited		<p>infrastructure and the potential for infrastructure to be adversely affected by development in paragraph 1 of the infrastructure subsection of section 3.3.</p> <p>B. Amend paragraph 2 of the Infrastructure subsection of section 3.3 to address the management effects of electricity transmission. This could be achieved by adding the words "and of" after " ... the management of the effects on ... " in the paragraph beginning "The National Policy Statement on Electricity Transmission (2009) ..."</p> <p>C. Amend the infrastructure subsection of section 3.3 to acknowledge the balance that needs to be struck between competing issues when implementing the Regional Policy Statement. This could be achieved by including an additional paragraph to the following effect: "When implementing the Regional Policy Statement, a balance needs to be struck between competing issues, for example, the infrastructure policies and the other policies of the Regional Policy Statement. No one set of policies has priority over another set of policies and, as such, actual or potential conflicts need to be addressed on a case-by-case basis."</p> <p>D. Amend the regionally significant resource management issues for infrastructure (Issue 2) in section 3.3 to include a new issue: the management of the effects of electricity transmission. This could be achieved by making amendments to the following effect: Infrastructure enables communities to provide for their social, economic and cultural wellbeing. "Infrastructure can generate adverse effects. The degree to which these are acceptable will vary, including depending upon the regional (including national) significance of the infrastructure." The management, use and operation of infrastructure can be adversely affected when incompatible land uses occur under, over, or adjacent.</p> <p>E. Insert a new policy in the proposed Regional Policy Statement to address the management of the effects of the National Grid. This could be achieved by introducing a new policy to the following effect: Policy X: Managing the Adverse Effects of the National Grid – Regional and District Plans</p>

Submitter	Submission	Summary
		<p>District and regional plans shall include policies and rules that also recognise and provide for a reasonable envelope of effects in which to facilitate the ongoing operation, maintenance and upgrading of the National Grid, and which ensure that when considering the environmental effects of new transmission assets, weight shall be given to the extent to which any adverse effects have been avoided, remedied or mitigated by appropriate site, route and method selection.</p> <p>Explanation:</p> <p>Electricity is vital for the health and safety of communities, as well as their economic sustainability. The National Policy Statement on Electricity Transmission 2008 recognises the national significance of the National Grid. Planning documents must adequately provide for the core strategic infrastructure that is required to support growth.</p> <p>Activities associated with the operation, maintenance and upgrade of existing transmission lines, and the establishment of new lines inevitably generate adverse environmental effects on the environment. Typically, these effects include visual impacts, noise, earthworks, and perceived effects arising from electric and magnetic fields. Clearly these environmental effects need to be managed, however the focus needs to be on the overall management approach rather than each individual or component effect. Such an approach properly recognises the unique characteristics of the assets and takes into account the unique physical characteristics and operational requirements of the National Grid that need to be taken into account when managing its environmental effects, including that:</p> <ul style="list-style-type: none"> • The network is an extensive, linear and connected system of lines and substations that traverses the full length of the country. The assets are of regional and national scale. Activities undertaken in any one part of the network can affect the remainder of the network; • The transmission assets are existing, dynamic working assets and need to operate within an envelope of accepted

Submitter	Submission	Summary
		<p>effects; and</p> <ul style="list-style-type: none"> The network has many operational and technical requirements that need to be recognised and that can impose constraints on the extent to which effects can be managed, and the extent to which alternative proposals can be put forward. <p>Furthermore, the existing transmission network is already established and is part of the existing environment. Accordingly, any residual environmental effects of the network are also a part of the existing environment. There needs to be recognition and acceptance that the network exists, that its form will change over time, and that it needs to be able to continue to operate within an envelope of accepted effects. When a new line is proposed, it is the careful route selection process that determines the best route in environmental and development cost terms. The route selection process is the best way to minimise and/or avoid, remedy or mitigate as appropriate, the potential adverse effects of new transmission lines. Full mitigation is not possible, because of the scale, extent and requirements of the linear network.</p>
F5/5	PowerCo Limited	Support in part
F9/2	NZ Transport Agency	Support point "C", Support in part points "D" and "E"
F13/16	Wellington International Airport Limited	Support in part
F17/13	Meridian Energy Limited	Support
F24/102	Masterton District Council	Oppose part "E"
F25/2	New Zealand Defence Force	Support
TrustPower Limited	124/5	Sought the following amendment: '...The New Zealand Energy Strategy (2007), the New Zealand Energy Efficiency and Conservation Strategy (2007) and the New Zealand Transport

Submitter	Submission	Summary
		Strategy (2008) outline New Zealand's actions on energy and climate change. The objectives, policies and methods on energy in this Regional Policy Statement will assist with making progress towards national targets. There are, however, a number of targets – such as reducing carbon dioxide-equivalent emissions from transport – where the Regional Policy Statement has limited influence. In addition, the benefits of renewable energy need to be recognised and provided for consistent with the proposed National Policy Statement for Renewable Energy Generation...'
F5/6	PowerCo Limited	Support
F17/14	Meridian Energy Limited	Support in part
F26/31	Mighty River Power	Support
TrustPower Limited	124/6	Sought the following amendment: '...There is also the potential for small scale renewable energy generation (up to 10MW). Tidal currents in Cook Strait and, to a lesser extent, wave action in Cook Strait and off the Wairarapa coast are also potentially significant renewable energy resources, but technological advances are required to realise this potential...'
TrustPower Limited	124/7	Sought the following amendment: 'The transport network, airports, the port, telecommunication and renewable energy generation facilities, the rail network and other utilities, including energy transmission and distribution networks, are significant physical resources.'
F5/7	PowerCo Limited	Support
Wellington City Council	131/3	Supported the objectives, policies and methods relating to this topic, subject to consideration of waste: cleanfill and landfill monitoring.
F1/99	Winstone Aggregates	Support and oppose
Wellington City Council	131/4	Sought that Greater Wellington develop and includes new policies and methods in the Regional Policy Statement that cover its statutory responsibilities relating to waste management, especially the

Submitter	Submission	Summary
		operational actions and monitoring required to improve the management of cleanfills.
F1/100	Winstone Aggregates	Support and oppose
Wellington City Council	131/5	Central government is currently developing a National Policy Statement on Renewable Energy, is revising the New Zealand Waste Strategy and is in the process of implementing the Waste Minimisation Act 2008. Each of these documents are important guiding documents in their fields. Noted that these will need to be taken into account in the Regional Policy Statement and regional and district plans as appropriate.
F1/101	Winstone Aggregates	Support and oppose
Wellington Fish and Game Council	133/7	Supported the issues, policies and methods relating to energy, infrastructure and waste and sought that they be retained.
Shear Hard Work	141/4	Agreed with the statement that traditional energy sources will not be able to meet increasing energy demands. Supported policies 6 and 10.

(a) Discussion

Winstone Aggregates sought an additional paragraph to be included in section 3.3 energy, infrastructure and waste on resource unavailability or inefficiencies in obtaining resources required to construct and maintain infrastructure. Officers note the region has an adequate supply of aggregate sources from hard rock areas and riverbeds that is currently meeting demand. Officers do not consider the current situation has the potential to impact upon regionally significant infrastructure projects. New infrastructure projects tend to be located in areas that have an adequate supply of aggregate for construction purposes. It is likely this situation will continue with large proposed roading projects like Transmission Gully.

Higgins Group Holdings Ltd sought retention of section 3.3 energy, infrastructure and waste, but that this section is cross-referenced with provisions in section 3.1, 3.4 and 3.11. Officers note that section 3.3 has extensive cross-referencing in Table 3 to relevant sections of 3.1, 3.4 and 3.11, and no further cross-referencing is required or necessary. The submitter sought further recognition of the need to provide for disposal of clean fill as an element in waste management. Officers note the comments made on clean fills that they are an alternative to depositing inert materials into municipal landfills. However, clean fills

have not been identified as a resource management issue, and are controlled by national guidelines and rules in district and regional plans. Officers do not consider that clean fills require any further recognition in the proposed Regional Policy Statement as an alternative to landfills.

The **Department of Corrections** sought that ‘social infrastructure’ and ‘essential social infrastructure’ be defined and provided for in the relevant objectives and policies. The New Zealand Defence Force supported the submission and Winstone Aggregates opposed the submission in part, as they were concerned that the specific details that may result may be inappropriate. Greater Wellington staff agree that essential social infrastructure should be recognised and provided for in the region and recommend amending the definition of regionally significant infrastructure to include specified social infrastructure. See the report on definitions for recommendations. Staff also note that policy 6 includes ‘the provision of essential services’ as part of the benefits of regionally significant infrastructure. Staff recommend including emergency services in the list of essential services in the last paragraph to the explanation of policy 6. See the report on policy 6 for the recommended changes.

John Christopher Horne sought reference to peak oil and the need to future proof the region against the impacts of future oil prices and the availability of finite fossil fuels. Greater Wellington staff note the discussion in the energy section of oil demand and supply trends, and the discussion of long-term energy challenges including responding to impacts from oil depletion and rising oil costs and consider this to be sufficient.

Mr Horne also sought reference to the Kyoto Protocol and its successor and the IPCC. Horticulture New Zealand opposed the submission. Greater Wellington staff note that there is reference to the challenge of meeting international climate change obligations. Central government is responsible for addressing international policy, and the discussion contained in the Regional Policy Statement is appropriate for the responsibilities that regional councils have.

Horticulture New Zealand sought that the consideration of climate change matters be limited to those that are required to be addressed at a regional level. The submission of Horticulture New Zealand was supported by Anders Crofoot. Greater Wellington staff consider the consideration of climate change in the Regional Policy Statement relates to the region so is appropriate.

Linda Hoyle requested that Section 3.3 be rewritten to take into account the government’s energy policy, and felt that the statements regarding renewable energy’s ability to meet the government’s policy are incorrect and misleading. Meridian Energy Limited opposed the submission. Greater Wellington staff consider the content to be

consistent with the requirements of the Act and the content of the government's energy policy.

Kapiti Coast District Council supported the issues identified on page 29, the intent of objective 9 and associated policies 6, 8-10, 38, 56, and 65, and supported objectives 10 and 11 and the intent of the associated policies. Paraparaumu Airport Limited opposed the submission. Federated Farmers of New Zealand supported the submission in part. Greater Wellington staff note the support.

Meridian Energy requested that paragraph 2 include Project West Wind in the list of energy generation facilities. Staff recommend that this be included now that it is fully consented.

Mighty River Power sought retention of the issues and objectives 9 and 10 subject to specific amendments requested. Greater Wellington staff have recommended retaining objectives 9 and 10 with some amendments but not the specific amendments requested by the submitter.

NZ Transport Agency requested that the infrastructure section in the introduction be expanded to discuss each infrastructure activity separately and noted that regionally significant infrastructure can have adverse environmental impacts which need to be balanced and managed appropriately. Transpower New Zealand Limited, PowerCo Limited, Oil Companies, Wellington International Airport Limited, and Westfield New Zealand Limited supported the submission. Meridian Energy Limited opposed the submission. Winstone Aggregates was not opposed to the submission in principle provided Winstone Aggregate's original submission points were accepted. Greater Wellington staff agree that infrastructure can have adverse environmental impacts which need to be balanced and managed, but consider the balancing of competing effects and considerations is required by section 5 of the Act and it is unnecessary to duplicate this in the Regional Policy Statement. A detailed discussion of separate infrastructure activities is unnecessary for an introductory section.

Paraparaumu Airport Ltd requested that Paraparaumu Airport be recognised and included as regionally significant infrastructure. Greater Wellington staff note that, while the airport may be locally significant, it does not provide economic or social benefits to the entire region, particularly Wairarapa, so it is not considered significant to the region as a whole.

Preserve Pauatahanui Incorporated felt that renewable energy and climate change were not regional issues, that traditional energy sources can meet demands for the foreseeable future, and supported research into renewable energy generation technology and the goal of ensuring electricity can be distributed securely with minimal environmental impact. Meridian Energy Limited opposed the submission. Federated Farmers of New Zealand supported the

submission in part but raised the issue of secure rural electricity supply as a regional issue. Greater Wellington staff note the support. Renewable energy generation and climate change impacts affect the region so they are appropriate issues to include.

South Wairarapa District Council questioned the accuracy of the second paragraph of the introduction with the exclusion of the Meridian Energy wind turbine and the wind farm at Makara, they suggested that small scale energy generation should mention individually owned or community owned wind generation, suggested recognising that infrastructure expansion needs to be planned appropriately to allow for development, suggested amending the first sentence of issue 2 to read ‘Infrastructure provides communities with essential services therefore should not be compromised by inappropriate land use or development’, noted that wind turbines do have some negative impacts, and noted that if wind generation is not managed in a sustainable way both environmentally and socially it may be contrary to section 5 of the Resource Management Act. Meridian Energy Limited opposed the submission. Federated Farmers of New Zealand supported small scale renewable energy projects as a potential method for gaining secure rural electricity supply. Greater Wellington staff have recommended that reference to Project West Wind be included in the second paragraph of the introduction. Staff agree with amending small-scale to be clearer, and recommend small scale renewable energy generation be replaced with ‘small and community-scale distributed renewable electricity generation (up to 4 MW)’ consistent with the definition in the proposed National Policy Statement on Renewable Energy Generation. The suggested wording for issue 2 limits the scope too narrowly, as it needs to remain a general statement. The comments on wind generation are noted.

Diane and Mike Strugnell supported policies that improve energy efficiency and conservation, opposed references to renewable energy, and felt that more regard should be given to landscape, social and health impacts, amenity values, and what the region can do effectively. Mighty River Power opposed the submission. Federated Farmers of New Zealand supported the submission. Greater Wellington staff note the support. Renewable energy generation impacts affect the region so they are appropriate issues to include. The other issues listed are addressed in other sections, and all considerations will be balanced in decision-making in accordance with Part II of the Act.

The Energy Efficiency and Conservation Authority requested changes to section 3.3 energy and infrastructure sub-sections, including adding reference to proposed energy generation projects, further references to electricity generation infrastructure, and discussion of marine energy development. Federated Farmers of New Zealand supported the submission in part but raised concerns regarding effects on rural production activities in the vicinity. Meridian Energy Limited supported the submission in part but did not

want reference to other Resource Management Act documents that are not finalised to be included. Greater Wellington staff consider that reference to specific targets in the New Zealand Energy Efficiency and Conservation Strategy (2007) is unnecessary. Reference to the potential for tidal/ocean current generation to occur is already made so further statements are unnecessary.

Transpower New Zealand Limited sought retention of the recognition of the benefits of infrastructure and the potential for infrastructure to be adversely affected by development. The submitter also requested amendment of the infrastructure subsection to address the management of effects of, as well as on, electricity transmission, and to acknowledge the balance that needs to be struck between competing issues when implementing the Regional Policy Statement. They requested a change to the infrastructure issue to incorporate management of the adverse effects of, as well as on, infrastructure, and requested a new policy to address the same. Meridian Energy Limited and the New Zealand Defence Force supported the submission. PowerCo Limited supported the submission in relation to addressing the management of effects of electricity transmission. NZ Transport Agency supported the requested amendments to section 3.3, supported the requested amendments to issue 2, and supported in part the requested new policy but wanted reference to all infrastructure. Wellington International Airport Limited supported the requested amendments to issue 2 but wanted reference to all identified regionally significant infrastructure. Masterton District Council opposed the requested new policy. Greater Wellington staff consider that a new policy is unnecessary. Reference to the need to balance competing considerations is addressed in section 3, where it states ‘The table also includes a reference to other policies that need to be considered alongside to gain a complete view of the issue across the full scope of the Regional Policy Statement.’ The Resource Management Act also requires the balancing of considerations in overall judgements under section 5. The support for the recognition of benefits of infrastructure and effects of development is noted.

TrustPower Limited requested amendment to section 3.3 to recognise and provide for the benefits of renewable energy consistent with the proposed National Policy Statement for Renewable Energy Generation. PowerCo Limited and Mighty River Power supported the submission. Meridian Energy Limited supported the submission but opposed specific reference to other Resource Management Act policy documents that are not finalised. Greater Wellington staff note that any changes required to be made to the Regional Policy Statement in order to give effect to the National Policy Statement will be made at the time the National Policy Statement provisions come into effect in accordance with section 55 of the Act.

TrustPower Limited requested that reference to small-scale hydro generation be replaced with the Electricity Market Rule of up to 10MW for certainty. The submitter also requested wave and tidal

resources be referred to as ‘potential’ resources. Greater Wellington staff agree that ‘small-scale’ needs amending for clarity and recommend replacing small-scale with ‘small and community-scale distributed renewable electricity generation (up to 4 MW)’ as defined in the proposed National Policy Statement on Renewable Energy Generation. Staff agree that wave and tidal resources are potentially significant resources and recommend an amendment accordingly.

TrustPower Limited requested the inclusion of renewable generation facilities in the list of significant physical resources. PowerCo Limited supported the submission. Greater Wellington staff agree, but have recommended the wording sought by the Energy Efficiency and Conservation Authority with the same effect.

Wellington City Council sought that Greater Wellington Regional Council develop and include new policies and methods in the proposed Regional Policy Statement to cover its statutory responsibilities relating to waste management and in particular clean fills. Officers note that the statutory responsibilities for waste management lies with city and district councils under the Local Government Act, through the formulation of waste management strategies. This is not a responsibility of Greater Wellington. In regards to cleanfills, the Ministry for the Environment issued national guidelines in 2004 to control the management of cleanfills in New Zealand. It is expected that all cleanfill operators follow these national guidelines. Further, Greater Wellington has rules regarding cleanfills in the Regional Plan for Discharge to Land. Officers do not consider that the proposed Regional Policy Statement requires new policies and methods for waste management or for the management of cleanfills in the region.

Wellington City Council noted the central government strategies and legislation currently being developed that will need to be taken into account as appropriate. Winstone Aggregates supported and opposed this submission, as they were concerned that any amendments were appropriate in terms of Part II of the Act and gave effect to Winstone’s original submission points. Staff note the comments.

Wellington Fish and Game Council supported the issues, policies, and methods relating to energy, infrastructure, and waste and sought they be retained. Greater Wellington staff have recommended they be retained with some amendments in response to other submissions.

Shear Hard Work agreed that traditional energy sources will not be able to meet increasing energy demands and supported policies 6 and 10. Greater Wellington staff note the support.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/6	Reject
Department of Corrections	32/2	Accept in part
Higgins Group Holdings Ltd	48/2	Reject
John Christopher Horne	49/7	Reject
John Christopher Horne	49/8	Reject
Horticulture New Zealand	50/7	Reject
Linda Hoyle	51/1	Reject
Kapiti Coast District Council	56/4	Accept
Meridian Energy Limited	82/4	Accept
Mighty River Power	83/6	Accept in part
NZ Transport Agency	91/3	Reject
Paraparaumu Airport Ltd	94/1	Reject
Preserve Pauatahanui Incorporated	101/1	Accept in part
South Wairarapa District Council	112/11	Accept in part
Diane and Mike Strugnell	113/2	Accept in part
The Energy Efficiency and Conservation Authority	117/6	Accept in part
Transpower New Zealand Limited	123/8	Accept in part
TrustPower Limited	124/5	Reject
TrustPower Limited	124/6	Accept in part
TrustPower Limited	124/7	Accept in part
Wellington City Council	131/3	Noted
Wellington City Council	131/4	Reject
Wellington City Council	131/5	Noted
Wellington Fish and Game Council	133/7	Accept in part

Submitter	Submission	Recommendation
Shear Hard Work	141/4	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend the introduction to section 3.3 as follows:

Energy

...

In 2009, the Hau Nui wind farm, near Martinborough, a small hydro generation site at Kourarau Dam near Gladstone in the Wairarapa, ~~and~~ two landfill gas generation plants at the Silverstream and Wellington City Southern landfill, and the West Wind wind farm in Makara were the only energy generation sites in the Wellington region. Resource consent has been granted for a marine energy development in Cook Strait. ...

....

The region faces several major long-term energy challenges, including responding to climate change and tackling carbon emissions, especially from transportation and energy generation. Other challenges are securing clean, renewable energy at affordable prices and using it efficiently, as well as responding to impacts on the region from oil depletion and the rising costs of oil. This means looking to make better use of existing energy resources through energy conservation and efficiency, better utilising the region's renewable energy resources, and looking at ways that the impacts from oil price increases and oil depletion can be mitigated.

...

The region contains significantly greater renewable energy resources than are currently used. Wind, biofuels and solar (for hot water systems), have been identified as possible renewable energy generation sources for the region. There is also the potential for small-scale and community-scale distributed renewable energy generation (up to 4 MW) including small-scale hydro in the region. Tidal currents in Cook Strait and, to a lesser extent, wave action in Cook Strait and off the Wairarapa coast are also potentially significant renewable energy resources, but technological advances are required to realise this potential. New Zealand has limited locations appropriate for marine energy development and the Cook Strait has one of the best tidal/ocean current resources in the country.

Infrastructure

The transport network, airports, the port, telecommunication facilities, the rail network and other utilities and infrastructure, including energy generation, transmission and distribution networks, are significant physical resources. This infrastructure forms part of national or regional networks and enables communities to provide for their social, economic, and cultural wellbeing and their health and safety. The efficient use and development of such infrastructure can be adversely affected by development. For example, land development can encroach on infrastructure or interfere with its efficient use.

The National Policy Statement on Electricity Transmission (2008) sets out objectives and policies to enable the management of effects on and of the electricity transmission network under the Resource Management Act. The Statement recognises that efficient and secure electricity transmission plays a vital role in the well-being of New Zealand and makes it explicit that electricity transmission is to be considered a matter of national significance.

2.28 Section 3.3 Energy, infrastructure and waste - Issue 1: Energy

Submitter	Submission	Summary
John Christopher Horne	49/9	Sought reference to peak oil and that the objective be changed accordingly.
Meridian Energy Limited	82/5	Sought that amended to read: 'the Wellington region is dependent on externally generated electricity and overseas-sourced fossil fuels and is therefore vulnerable to supply disruptions and energy shortages. However, significant renewable energy resources exist within the region. Development of some of those resources, at appropriate locations within the region, may be necessary to address that vulnerability. The development of renewable energy resources has the potential to create adverse effects and conflicts of values. Some compromises may be necessary in order to achieve a sustainable energy future.'
F8/8	TrustPower Limited	Support in part
F26/11	Mighty River Power	Support
Preserve Pauatahanui Incorporated	101/2	Stated Issue 1 was misleading as this is not a regional issue it is national, and the source of energy is irrelevant as all energy is supplied to the national grid

Submitter	Submission	Summary
		so locally produced energy is not necessarily utilised locally. The economic barriers are not taken into account.
F17/15	Meridian Energy Limited	Oppose
The Energy Efficiency and Conservation Authority	117/7	Sought the following change to issue 1: "1. Energy The Wellington region is dependant on externally generated electricity and overseas-sourced fossil fuels and is therefore vulnerable to supply disruptions and energy shortages. In addition, demand for energy is increasing. However, significant opportunities for improving the efficiency of the end use of energy and for the development of renewable energy resources exist within the region."
F8/9	TrustPower Limited	Support in part
F24	Mighty River Power	Support
TrustPower Limited	124/8	Sought that the issue be amended to read: 'The Wellington region is dependant on externally generated electricity and overseas-sourced fossil fuels and is therefore vulnerable to supply disruptions and energy shortages. However, significant renewable energy resources exist within the region and these can be developed to help meet the socioeconomic needs of current and future generations.' And sought consequential changes.
Mighty River Power	F26/32	Support
Westfield New Zealand Ltd	138/14	Supported issue 1

(a) Discussion

John Christopher Horne requested that issue 1 refer to 'peak oil'. Greater Wellington staff note that the issues of oil depletion and supply shortages are discussed in the introduction to the section. Issue 1 relates more to the vulnerability to shortages of the end product rather than the source product. Reference to 'peak oil' is therefore unnecessary.

Meridian Energy Limited requested additional wording in issue 1 to recognise the potential development of the renewable energy resources and the potential adverse effects and conflicts that may arise. Mighty River Power supported the submission. TrustPower Limited supported the submission insofar as it is consistent with TrustPower's original submission. Greater Wellington staff consider that these issues relate more to infrastructure rather than energy, so no change is recommended.

Preserve Pauatahanui Incorporated stated that issue 1 was misleading as it is not a regional issue and does not take into account all energy going into the national grid, and economic barriers are also not taken into account. Meridian Energy Limited opposed the submission. Greater Wellington staff consider that renewable energy has regional impacts and is therefore an appropriate issue. The introduction to energy discusses cost and pricing concerns. The costs and benefits of individual applications are taken into account when consents are applied for.

The Energy Efficiency and Conservation Authority sought that issue 1 be amended as underlined to read 'The Wellington region is dependent on externally generated electricity and overseas-sourced fossil fuels and is therefore vulnerable to supply disruptions and energy shortages. In addition, demand for energy is increasing. However, significant opportunities for improving the efficiency of the end use of energy and for the development of renewable energy resources exist within the region.' TrustPower Limited supported the submission insofar as it was consistent with TrustPower's original submission. Mighty River Power supported the submission. Greater Wellington staff agree that increased demand for energy is an issue. End use of energy is not an issue the Regional Policy Statement can address, however, as the Statement is about the management of the resources.

TrustPower Limited sought that issue 1 be amended as underlined to read 'The Wellington region is dependent on externally generated electricity and overseas-sourced fossil fuels and is therefore vulnerable to supply disruptions and energy shortages. However, significant renewable energy resources exist within the region and these can be developed to help meet the socioeconomic needs of current and future generations'. Greater Wellington staff consider that this statement is not appropriate as a general statement, as it implies that the sites can be developed and this may not always be so, it does not take into account other competing factors which will decide whether an application for the development may be approved or not, or whether a plan provision or designation should go ahead. The potential to develop sites for renewable energy generation is discussed in the introduction.

Westfield New Zealand Ltd supported issue 1. The submitters support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
John Christopher Horne	49/9	Reject
Meridian Energy Limited	82/5	Reject
Preserve Pauatahanui Incorporated	101/2	Reject
The Energy Efficiency and Conservation Authority	117/7	Accept in part
TrustPower Limited	124/8	Reject
Westfield New Zealand Ltd	138/14	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend issue 1 to read:

1. Energy

The Wellington region is dependant on externally generated electricity and overseas-sourced fossil fuels and is therefore vulnerable to supply disruptions and energy shortages. In addition, demand for energy is increasing. However, significant renewable energy resources exist within the region.

2.29 Section 3.3 Energy, infrastructure and waste - Issue 2: Infrastructure

Submitter	Submission	Summary
Winstone Aggregates	15/7	Sought that Issue 2 be amended as follows: "...or owing to resource unavailability or inefficiencies (i.e. increased costs) in obtaining such resources (e.g. aggregates, steel)" Also sought a cross references to minerals provisions of the Regional Policy Statement on Pages 30-32.
New Zealand Defence Force	86/3	Supported. Sought that the issue be retained.
NZ Transport Agency	91/4	Requested that the issue be amended to include incompatible land use activities that are located 'near' infrastructure.

Submitter	Submission	Summary
F3/1	Vector	Support
F13/17	Wellington International Airport Limited	Support
F19/7	Horticulture New Zealand	Oppose
F20/33	Westfield New Zealand Ltd	Support
TrustPower Limited	124/9	Supported
Westfield New Zealand Ltd	138/15	Supported issue 2

(a) Discussion

Winstone Aggregates sought that issue 2 be amended to add ‘...or owing to resource unavailability or inefficiencies (i.e. increased costs) in obtaining such resources (e.g. aggregates, steel).’ The submitter also sought cross references to minerals provisions of the Regional Policy Statement on pages 30-32. Greater Wellington staff consider that the issue of mineral resource unavailability and inefficiencies is addressed in section 3.11. The provisions of the Regional Policy Statement are to be considered as a whole when decisions are made. Staff note that reference to relevant provisions from section 3.11 are listed in table 3 on pages 30-32.

The **New Zealand Defence Force** supported issue 2 and sought that it be retained. Greater Wellington staff note the support. The issue is recommended to be retained with amendments in response to other submissions.

The **NZ Transport Agency** requested that issue 2 be amended to include incompatible land use activities located ‘near’ infrastructure. Vector, Wellington International Airport Limited, and Westfield New Zealand Ltd supported the submission. Horticulture New Zealand opposed the submission. Greater Wellington staff consider that ‘near’ is an imprecise term that may cause confusion amongst users of the Regional Policy Statement as to whether their activities are classed as ‘near’. As a result of the Oil Companies’ submission on Policy 7 regarding the same wording, staff have recommended replacing ‘alongside’ with ‘adjacent’, which has been defined by case law. Staff

therefore recommend replacing ‘alongside’ with ‘adjacent’ in issue 2 for consistency.

TrustPower Limited and **Westfield New Zealand Ltd** supported issue 2. Greater Wellington staff note the support.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/7	Reject
New Zealand Defence Force	86/3	Accept in part
NZ Transport Agency	91/4	Accept in part
TrustPower Limited	124/9	Accept
Westfield New Zealand Ltd	138/15	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend issue 2 to read:

2. Infrastructure

Infrastructure enables communities to provide for their social, economic and cultural wellbeing. The management, use and operation of infrastructure can be adversely affects when incompatible land uses occur under, over, on, or ~~alongside~~ adjacent.

2.30 Section 3.3 Energy, infrastructure and waste - Issue 3: Waste

Submitter	Submission	Summary
Winstone Aggregates	15/8	Sought Issue 3 be amended as follows: "...Clean and managed fills can provide an appropriate means of disposing of material that is not needed to be disposed of to landfill due to it either being inert or having low potential to create contamination when appropriately managed. Quarry sites and sites in close proximity to quarries can have added efficiency as cleanfills because the trucks which dispose of fill are able to backload with aggregate products, thereby minimising fuel consumption, exhaust emissions and vehicle fleet efficiency."

Submitter	Submission	Summary
Westfield New Zealand Ltd	138/16	Supported issue 3.

(a) Discussion

Winstone Aggregates sought that issue 3 be amended by adding reference to ‘cleanfills’ as an alternative place of disposing material that may end up in landfills. Staff accept that cleanfills, if appropriately managed, according the guidelines released by the Ministry for the Environment, *A Guide to the Management of Cleanfills (2002)* is another alternative source for fill deposition. The amendment sought is not an addition to the issue but rather an alleviation of the issue. In this regard, the amendment sought does not warrant a change to the issue.

Westfield New Zealand Ltd supported issue 2. The submitters support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/8	Reject
Westfield New Zealand Ltd	138/16	Accept

(c) Recommended changes

There are no changes recommended for issue 3.

2.31 Objective 9

Submitter	Submission	Summary
East Harbour Environmental Association Incorporated	33/5	Queried whether energy production is covered by objective 9(b). Made reference to policy 63 from the draft Regional Policy Statement.
Genesis Energy	40/1	Sought retention
Makara Guardians Incorporated	68/1	Sought that the word ‘maximise’ should be changed to ‘make best use of’. Stated that maximise indicates a use of all resource at any cost, regardless of any community or effects-based drawbacks. Also sought addition of wording: 9(f) ‘do not adversely affect local communities’

Submitter	Submission	Summary
F17/16	Meridian Energy Limited	Oppose
F26/50	Mighty River Power	Oppose
Makara Ohariu Community Board	69/2	Sought that the word 'maximise' be changed to 'make best use of'. Stated that maximise indicates a use of all resource at any cost, regardless of any community or effects-based drawbacks. Also sought addition of wording: 9(f) 'do not adversely affect local communities'.
F17/17	Meridian Energy Limited	Oppose
F26/51	Mighty River Power	Oppose
Meridian Energy Limited	82/6	Sought retention
Mighty River Power	83/7	Sought that the objective be amended to read: 'The region's and nation's energy needs are met in ways that...'
F17/18	Meridian Energy Limited	Support
Porirua City Council	100/3	Sought that the intent of the objective and its policies and methods be retained. However, requested that Greater Wellington consider adding a method under the objective for Greater Wellington to lead a region-wide strategy for renewable energy development to assist in determining the location, appropriateness and priority of development encouraged by objective 9 in relation to other resource management issues and activities.
F12/3	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support

Submitter	Submission	Summary
F17/19	Meridian Energy Limited	Oppose
F26/29	Mighty River Power	Support
South Wairarapa District Council	112/12	Sought an additional clause: (f) while recognising amenity values, protecting significant landscapes and biodiversity and not adversely affecting local communities.
F17/20	Meridian Energy Limited	Oppose
F26/52	Mighty River Power	Oppose
The Energy Efficiency and Conservation Authority	117/8	Supported and sought retention of objective 9
TrustPower Limited	124/10	Sought the objective be amended so clause (b) read: '(b) promotes renewable energy developments of a diverse type and scale; Or, sought alternatively to retain clause (b) as written and insert a new sub-clause: (f) promotes development of renewable energy generation
Wellington City Council	131/52	Supported objective 9

(a) Discussion

East Harbour Environmental Association Incorporated queried whether energy production is covered by objective 9(b) and made reference to policy 63 from the draft Regional Policy Statement. Greater Wellington staff agree that energy production is covered by objective 9 and note that policy 63 in the draft Regional Policy Statement related to reduction of solid waste, not energy.

Genesis Energy sought retention of objective 9. Staff recommend retaining objective 9 as proposed.

Makara Guardians Incorporated and **Makara Ohariu Community Board** sought that 'maximise' be replaced with 'make best use of' and also sought the addition of '(f) do not adversely affect local communities'. Meridian Energy Limited and Mighty River Power

opposed the submission. Greater Wellington staff note that objective 9(c) refers to maximising the use of renewable energy resources as a proportion of total energy used. The wording of objective 9 relates to the matters raised in issue 1. Other considerations such as the effects on local communities and the environment are addressed elsewhere in the Regional Policy Statement and will be considered at the plan and consents stage. It is therefore recommended that the word 'maximise' be retained.

Meridian Energy Limited sought retention of objective 9. Staff recommend retaining objective 9 as proposed.

Mighty River Power sought that objective 9 be amended as underlined 'The region's and nation's energy needs are met in ways that...' Meridian Energy Limited supported the submission. Greater Wellington staff consider that the council is concerned with regional matters and addresses regional issues so it is appropriate to refer to the region's needs.

Porirua City Council requested the retention of the intent of objective 9 and associated policies and methods, and requested an additional method be added for Greater Wellington to lead a region-wide strategy for renewable energy development. Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd, and Mighty River Power supported the submission. Meridian Energy Limited opposed the submission. Greater Wellington has been exploring the issue of renewable energy for the last 12 months. Rather than developing a broad strategy on which to base a public consultation exercise, which has potential to duplicate work already undertaken and consulted on by central government agencies, Greater Wellington has focussed its work on exploring those areas in the Wellington region where there are either immediate or future benefits around sustainable energy use and production. Specifically, these areas relate to wind generation, domestic insulation, marine (tidal) currents and plug in electric vehicles. To this end, a partnership with the Energy Efficiency and Conservation Authority around domestic insulation has been entered into, and a publication on renewable energy resources in the Wellington region will also be produced. This publication will engage groups such as councils, schools and sector groups in ongoing debate around the renewable energy resource options for the Wellington Region. It is therefore not considered necessary to prepare a region wide strategy and more efficient to focus on the programs being currently identified.

South Wairarapa District Council requested an addition to objective 9 to read '(f) while recognising amenity values, protecting significant landscapes and biodiversity, and not adversely affecting local communities.' Meridian Energy Limited and Mighty River Power opposed the submission. Greater Wellington staff note that these considerations are addressed in other provisions of the Regional Policy Statement, and that the consideration of these matters as a

whole is required at the planning and consents stage. It is therefore recommended that no change be made.

The Energy Efficiency and Conservation Authority supported and sought retention of objective 9. Staff recommend retaining objective 9 as proposed.

TrustPower Limited sought amendment of objective 9(b) to read ‘promotes renewable energy developments of a diverse type and scale’ or alternatively sought a new clause (f) to read ‘promotes development of renewable energy generation’. Greater Wellington staff note that there are policies associated with objective 9 that recognise the benefits of renewable energy and promote small-scale renewable energy generation, and the objective relates to meeting energy needs through renewable energy. It is therefore recommended that the requested change not be made.

Wellington City Council supported objective 9. The submitters support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
East Harbour Environmental Association Incorporated	33/5	Accept in part
Genesis Energy	40/1	Accept
Makara Guardians Incorporated	68/1	Reject
Makara Ohariu Community Board	69/2	Reject
Meridian Energy Limited	82/6	Accept
Mighty River Power	83/7	Reject
Porirua City Council	100/3	Accept in part
South Wairarapa District Council	112/12	Reject
The Energy Efficiency and Conservation Authority	117/8	Accept
TrustPower Limited	124/10	Reject
Wellington City Council	131/52	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

No changes are recommended to objective 9.

2.32 Objective 10

Submitter	Submission	Summary
Airways Corporation of New Zealand Ltd	4/2	Sought that the objective be retained in current form without modification as gives protection to the Wellington International Airport and essential radio communication facilities.
F11/3	Paraparaumu Airport Limited	Support
Winstone Aggregates	15/9	Sought a new objective 10A as follows: "Resources required for infrastructure construction (such as aggregates, concrete and steel) are provided for and are able to be produced efficiently to reduce economic, social and environmental costs in infrastructure provision."
Genesis Energy	40/2	Sought that objective 10 be amended to read: 'The social, economic, cultural and environmental benefits of regionally significant infrastructure are recognised, protected and provided for.'
F1/36	Winstone Aggregates	Support
F4/4	Transpower New Zealand Limited	Support
F5/11	PowerCo Limited	Support
F7/3	Oil Companies	Support
F13/18	Wellington International Airport Limited	Support
F26/3	Mighty River Power	Support
Meridian Energy Limited	82/7	Sought retention of objective 10.
F25/3	New Zealand Defence Force	Support
Mighty River Power	83/8	Sought objective 10 be amended to read: 'The social, economic, cultural and environmental benefits of nationally and regionally significant infrastructure are recognised and protected.'

Submitter	Submission	Summary
F8/10	TrustPower Limited	Support
F13/19	Wellington International Airport Limited	Support
F17/21	Meridian Energy Limited	Support
New Zealand Defence Force	86/4	Supported the inclusion of the regionally significant infrastructure objective10 and sought that it be retained. Stated that the recognition of regionally important infrastructure and the protection of that infrastructure is appropriate. Also sought a new consideration policy which seeks to protect regionally significant infrastructure at the regulatory approval stage.
F1/78	Winstone Aggregates	Support
F13/20	Wellington International Airport Limited	Support
The Energy Efficiency and Conservation Authority	117/9	Sought amendments to objective10 as follows: The social, economic, cultural and environmental, benefits of regionally and nationally significant infrastructure are recognised and promoted.
F13/21	Wellington International Airport Limited	Support
TrustPower Limited	124/11	Sought retention
Wellington International Airport Limited	134/3	Supported
F11/10	Paraparaumu Airport Limited	Support
Wellington City Council	131/53	Supported objective 10

Submitter	Submission	Summary
Westfield New Zealand Ltd	138/17	Supported objective 10

(a) Discussion

Airways Corporation of New Zealand Ltd sought that objective 10 be retained without modification. Paraparaumu Airport Limited supported the submission. Staff recommend retaining objective 10 as proposed.

Winstone Aggregates sought a new objective 10A to read ‘Resources required for infrastructure construction (such as aggregates, concrete, and steel) are provided for and are able to be produced efficiently to reduce economic, social, and environmental costs in infrastructure provision.’ Greater Wellington staff note that objective 30 and associated policies and methods address local procurement of aggregates and mineral resources. Consideration of the objectives and policies of the Regional Policy Statement will be considered as a whole at the planning stage, and table 3 provides cross references to section 3.11. The requested change is therefore not necessary.

Genesis Energy sought that objective 10 be amended to read ‘The social, economic, cultural, and environmental benefits of regionally significant infrastructure are recognised, ~~and~~ protected, and provided for.’ Winstone Aggregates, Transpower New Zealand Limited, PowerCo Limited, Oil Companies, Wellington International Airport Limited, and Mighty River Power supported the submission. Greater Wellington staff consider the wording as proposed is appropriate, as recognition and protection of benefits is sufficient.

Mighty River Power sought that objective 10 be amended to read ‘The social, economic, cultural, and environmental benefits of nationally and regionally significant infrastructure are recognised and protected.’ TrustPower Limited, Wellington International Airport Limited, and Meridian Energy Limited supported the submission. Greater Wellington staff note that there is no finalised list of nationally significant infrastructure available to refer to, and consider the council is concerned with regional matters and addresses regional issues so referring to regionally significant infrastructure is appropriate. No change is considered necessary.

Meridian Energy Limited sought retention of objective 10. The New Zealand Defence Force supported the submission. Staff recommend retaining objective 10 as proposed.

The **New Zealand Defence Force** supported the inclusion of regionally significant infrastructure in objective 10. Greater Wellington staff note the support for objective 10. The submitter also

sought that a new policy be added to protect regionally significant infrastructure at the regulatory approval stage. Winstone Aggregates and Wellington International Airport Limited supported the submission. Part II of the Act provides for a balancing of considerations, which occurs on a case by case basis at the regulatory approval stage as well as on a wider basis at the planning stage. Staff consider the current level of protection for regionally significant infrastructure is appropriate as part of this consideration.

The Energy Efficiency and Conservation Authority sought amendment to objective 10 to read ‘The social, economic, cultural and environmental benefits of regionally and nationally significant infrastructure are recognised and ~~protected~~ promoted.’ Wellington International Airport Limited supported the submission. Greater Wellington staff note that there is no finalised list of nationally significant infrastructure available to refer to, and consider the council is concerned with regional matters and addresses regional issues so referring to regionally significant infrastructure is appropriate. In addition, ‘protected’ is considered more appropriate as it more accurately reflects what the objective aims to achieve. It is therefore recommended that no change is made.

TrustPower Limited sought retention of objective 10. Staff recommend retaining objective 10 as proposed.

Wellington International Airport Limited supported objective 10. Paraparaumu Airport Limited supported the submission. Staff recommend retaining objective 10 as proposed.

Wellington City Council and **Westfield New Zealand Ltd** supported objective 10. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Airways Corporation of New Zealand Ltd	4/2	Accept
Winstone Aggregates	15/9	Reject
Genesis Energy	40/2	Reject
Meridian Energy Limited	82/7	Accept
Mighty River Power	83/8	Reject
New Zealand Defence Force	86/4	Accept in part
The Energy Efficiency and Conservation Authority	117/9	Reject
TrustPower Limited	124/11	Accept

Submitter	Submission	Recommendation
Wellington International Airport Limited	134/3	Accept
Wellington City Council	131/53	Accept
Westfield New Zealand Ltd	138/17	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

No changes are recommended to objective 10.

2.33 Objective 11

Submitter	Submission	Summary
Winstone Aggregates	15/10	Sought objective 11 be amended as follows: The quantity of waste disposed is reduced, and waste that is disposed of is disposed of in appropriate locations e.g. so as valuable landfill space is not taken up by material that can be disposed of in managed fills or cleanfills.
Horticulture New Zealand	50/8	Sought amendments to methods of implementation for objective 11 to include stakeholders and community – not just councils
F22/25	Anders Crofoot	Support
Korokoro Environment Group	65/2	Sought retention
TrustPower Limited	124/12	Sought retention
Wellington City Council	131/54	Supported objective 11.

(a) Discussion

Winstone Aggregates sought a change to objective 11 to take account of waste that could be deposited in clean fills rather than filling up landfills. Officers accept that clean fill waste should not be located in large municipal landfills that are expensive to manage and have relatively short life spans. However, issue 3 and objective 3 relate to the fact that there is an ever growing supply of waste from our society, and this waste, in spite of large recycling programmes in our major cities, still continues to grow. The issue and the objective are about ways to reduce the overall waste stream and not about finding

alternative places to deposit ‘clean’ waste. Officers recommend that objective 11 remain in its current form, and further, there is no requirement for another policy to address the submitter’s concerns.

Horticulture New Zealand supported objective 11, however would like to see in the methods that greater allowance is made for other groups and stakeholders, not just councils. The submission of Horticulture New Zealand was supported by Anders Crofoot. Officers note that waste management is the responsibility of city and district councils under the Local Government Act. District councils usually involve all stakeholders and community groups in their consultation processes for waste management planning. The proposed Regional Policy Statement signals the lead agency as district councils and it is their responsibility to consult all parties.

Korokoro Environment Group and **TrustPower Limited** sought retention of objective 11. **Wellington City Council** supported objective 3. The submitters support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/10	Reject
Horticulture New Zealand	50/8	Accept in part
Korokoro Environment Group	65/2	Accept
TrustPower Limited	124/12	Accept
Wellington City Council	131/54	Accept

The further submissions from Anders Crofoot is accepted in part accordingly.

(c) Recommended changes

There are no recommended changes to objective 11.

2.34 Section 3.4 Fresh water

Submitter	Submission	Summary
Winstone Aggregates	15/11	Sought that the Freshwater section of the Regional Policy Statement be deleted and re-notified with appropriate provisions in terms of the Resource Management Act 1991 which provide for industrial use of water resources. Stated that in doing so it is also necessary to include a policy which provides for primarily non-consumptive takes, such as the abstraction of water for aggregate

Submitter	Submission	Summary
		extraction and processing activities to be considered without having regard to maximum flow or level requirements; as the bulk of the water taken is generally returned to the water body from which it came as it is used for activities such as aggregate washing and then treated prior to being returned to the water body.
CentrePort Wellington	23/5	Requested deletion of references to public access to and along the Coastal Marine Area as this is not an appropriate section for this matter.
F13/22	Wellington International Airport Limited	Support
Federated Farmers of New Zealand	35/11	Sought the insertion of a footnote with a link to the technical reports or studies to support the statements made in relation to water quality. Or alternatively state that some land uses can adversely effect water quality and elevate levels of nitrogen found in surface and ground water
F22/26	Anders Crofoot	Support
F24/35	Masterton District Council	Support
Higgins Group Holdings Ltd	48/3	Sought that the Regional Policy Statement provide clear guidance as to how water is to be allocated within regional plans and specify that a priority allocation system be used that recognises the needs of activities that have a significant public good, such as aggregates extraction and processing. Sought inclusion of a new policy that seeks to enable aggregate activities to occur that intercept the groundwater table, subject to best practice measures and the avoidance, remediation or mitigation of any adverse effects on groundwater quality. Sought the Regional Policy Statement be amended to include provisions that recognised the importance of river based aggregate extraction and enable extraction for the purpose of aggregate for infrastructure as well as for flood management and river control.
F1/38	Winstone Aggregates	Support
John Christopher	49/10	Sought a list of contaminants from the transport system

Submitter	Submission	Summary
Horne		and changes to the objectives accordingly.
Horticulture New Zealand	50/9	<p>Stated that efficient use of water is a matter that deserves some particular consideration. The term is used a number of times throughout the Regional Policy Statement but is not clearly defined apart from the explanation in relation to policy 18. In particular the proposed Regional Policy Statement should direct that provision for demand side efficiencies are made in the region, including a definition for reasonable domestic take, encouragement of water recycling and water management plans where practicable, and provision for research on the state and availability of water resources in the region.</p> <p>Sought that a definition for water efficiency that includes economic, technical and allocative efficiency be included. Also sought a definition of reasonable domestic take along the lines of the World Health Organisation.</p> <p>Sought amendment to policies on efficient use of water to include a definition for reasonable domestic take, encouragement of water recycling and water management plans where practicable, and provision for research on the state and availability of water resources in the region.</p>
F22/27	Anders Crofoot	Support
Kapiti Coast District Council	56/5	<p>Agreed with the issues raised in the chapter specifically:</p> <ul style="list-style-type: none"> • that freshwater is a fundamental issue for the region both in terms of stormwater discharges from urban areas and agricultural runoff; • that in general the rivers and streams of the region are not functioning well; and • that there is increasing demand for water across the region. In relation to this issue the council notes that this is a particular concern for the Kapiti district. <p>Stated particularly concern that the possible influence of climate change had not been included in this section. Climate change will have significant impacts on the availability of freshwater resources that are reliant on rainfall. It will also affect the quantity of stormwater reaching rivers, streams and the coast.</p>
Masterton District Council	74/3	Sought that the objectives and policies of the chapter be amended to provide a better balance for the use of the waterways.

Submitter	Submission	Summary
F19/8	Horticulture New Zealand	Support in part
Masterton District Council	74/4	Sought that the chapter be re-written to reflect the language and presumption of the Resource Management Act 1991, for example avoiding remedying and mitigating adverse effects of activities on the environment.
F19/9	Horticulture New Zealand	Support in part
Meridian Energy Limited	82/8	Sought the inclusion of a new issue to read: '5. Water is essential for sustaining people and communities – The water in the region's rivers, streams and lakes is a natural resource of vital importance for sustaining the wellbeing of people, communities, and the regional economy. Water needs to be available for use to meet the foreseeable needs of current and future generations.'
F16/6	Genesis Energy	Support
F19/10	Horticulture New Zealand	Support
F26/12	Mighty River Power	Support
F24/75	Masterton District Council	Support
Mighty River Power	83/9	Sought that the recognition of the activities that can generate poor ecosystem function in rivers, lakes, and wetlands be retained. Sought that the explanation be amended to include that the effects of an activity can be considered where they can be offset by another form of environmental compensation, using a 'no net loss' approach.
F1/64	Winstone Aggregates	Support in part
F19/11	Horticulture New Zealand	Support

Submitter	Submission	Summary
Mighty River Power	83/10	Sought the inclusion of a new 'plan' policy that recognises the economic and social benefits obtained from the use of water resources.
F16/15	Genesis Energy	Support
F17/22	Meridian Energy Limited	Support
Porirua City Council	100/4	Commended the efforts of the Regional Policy Statement to reduce stormwater contamination, minimise the effects of earthworks and vegetation clearance, and maintain and enhance the aquatic ecosystem health in water bodies. Stated that such policies are vital to maintaining and improving the quality and ecological health of Porirua Harbour and its catchments. For this reason, the environmental focus of the fresh water objectives and policies were strongly supported.
F12/4	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
David Scott	109/1	Sought that Greater Wellington co-ordinate and make potable water supplies available to all districts within the region and that water metering of individual ratepayers not be a management tool to ration drinking supply by price
South Wairarapa District Council	112/13	Page 34 - sought that it be recognised that some urban water supplies are supplied by rivers, for example Greytown and indirectly Martinborough. Page 34 - Noted the linking of poor water quality with farming/agriculture is implied through the document and stated that while agricultural land use has an impact on water quality; it is just one of many factors and needs to be assessed against the economic and community benefit.
F22/4	Anders Crofoot	Support

Submitter	Submission	Summary
F23/27	Federated Farmers of New Zealand	Support
F24/100	Masterton District Council	Support
Tararua Tramping Club	114/7	Supported policies in this chapter to eliminate pollution of these waters and more generally to protect the natural ecosystems.
Wairarapa Regional Irrigation Trust	127/2	Page 34 - Stated that it was unhelpful to speculate on causes of elevated nitrate levels without evidence – The submitter asked that the wording be amended to “This could be from farming or from septic tanks.” The recognition that water resources are limited and in some cases fully allocated and the impact of climate change in increasing this pressure was supported. The statement that Wairarapa ground water levels are declining year by year without some indication of a reason was not considered helpful. Stated that if it is due to abstractions, then this is within the Council's control. If not, then stated that some research is needed on the naturally occurring circumstances causing this ongoing decline. Stated that the same is true of the statement on low flows in surface water, asked whether this was natural or within Council control?
F19/12	Horticulture New Zealand	Support in part
F23/28	Federated Farmers of New Zealand	Support
Wellington City Council	131/6	Supported the objectives, policies and methods relating to fresh water, subject to consideration of a stormwater strategy.
Wellington Fish and Game Council	133/8	Opposed the introduction to Freshwater and issues raised. Stated that concerns could be addressed by noting the impact on water ways due to increasing sediment loads as a result of some land uses.
F19/13	Horticulture New Zealand	Oppose

Submitter	Submission	Summary
Wellington Residents Coalition	136/1	Stated that the present system of retaining metering for industrial, commercial and large residential users only, should be retained, and sensible measures introduced to reduce wasteful consumption.

(a) Discussion

Winstone Aggregates sought that the freshwater section of the Regional Policy Statement be deleted and re-notified with appropriate provisions in terms of the Resource Management Act 1991 which provides for industrial use of water resources. Greater Wellington staff note that sections 59 to 62 of the Resource Management Act identify what's appropriate for a regional policy statement. Section 61, in particular, refers to functions under section 30, the provisions of part II and the duty under section 32 and regulations. The proposed Regional Policy Statement has been prepared in accordance with these provisions. Part II of the Resource Management Act mentions ... *use, development, and protection of natural and physical resources* ... in section 5(2), and it's not necessary to repeat what is already stated in the Resource Management Act.

Winstone Aggregates also sought a policy which provides for primarily non-consumptive takes, such as the abstraction of water for aggregate extraction and processing activities to be considered without having regard to maximum flow or level requirements. Greater Wellington staff note that policy 11 addresses the management of water quality and flows and water levels without distinguishing between different activities or uses. It applies to the management of water bodies and will be relevant to any activity or use identified in sections 14 and 15 of the Act. It's appropriate to determine how particular activities are to be addressed at the time rules are included in the regional plan when it is reviewed. Policy 12 addresses water taken from water bodies without any distinction about what the water is used for. It is not recommended that any exclusion is made in these policies for any particular activity or use.

CentrePort Wellington requested deletion of references to public access to and along the coastal marine area in section 3.4 as this is not an appropriate section for this matter. Their submission was supported by Wellington International Airport. Greater Wellington staff comment that section 6(d) of the Resource Management Act addresses public access for the coastal marine area, lakes and rivers. Rather than delete the reference to coastal marine area in section 3.4, an addition can be made which clarifies that the issue and objective are shared with the issue and objective about public access in section 3.2. A consequential change is also made in section 3.2 that cross references to section 3.4. These changes are in the report on section 3.2 Coastal environment & Section 3.4 Fresh water - Issue 4

Federated Farmers of New Zealand sought the insertion of a footnote with a link to the technical reports or studies to support the statements made in relation to water quality, or alternatively state that some land uses can adversely effect water quality and elevate levels of nitrogen found in surface and ground water. Their submission was supported by Anders Crofoot and Masterton District Council. Greater Wellington staff comment that the Regional Policy Statement is a statutory planning document for managing resources. References to supporting documents are in the section 32 reports, which are prepared under the Resource Management Act and released at the same time as the proposed Regional Policy Statement. The technical documents on water quality confirm that land uses are adversely affecting effecting water quality.

Higgins Group Holdings Ltd sought that the Regional Policy Statement provide clear guidance as to how water is to be allocated within regional plans and specify that a priority allocation system be used that recognises the needs of activities that have a significant public good, such as aggregates extraction and processing. Greater Wellington staff comment that the regional plan, which will give effect to the Regional Policy Statement will set out how water is to be allocated. All activities that take water have a public good component, whether it is cultural, social or economic. Policy 18 identifies a priority for public water supply but it is not considered feasible or helpful to attempt in the Regional Policy Statement to identify other priorities for the multitude of other uses of water.

The submitter sought a new policy to enable aggregate activities intercepting groundwater to occur subject to best practice and avoiding and remedying adverse effects. Greater Wellington staff comment that the level of detail being sought by the submitter on this point is more appropriate in a regional plan context where decision making is about whether activities are permitted or need resource consents.

Higgins Group Holdings Ltd also sought provisions enabling aggregate activities and recognising the importance of river based aggregate extraction for the purpose of aggregate for infrastructure as well as for flood management and river control. Greater Wellington staff note that policy 60 emphasises the social, economic and environmental benefits from utilising all mineral resources in the region, whether they are in rivers or on land. It's not necessary to include an additional provision relating specifically to rivers in the Regional Policy Statement. The submission was supported by Winstone Aggregates.

John Christopher Horne sought a list of contaminants from the transport system and changes to the objectives accordingly. Greater Wellington staff comment that providing such an inventory is not appropriate to include in the Regional Policy Statement and no change is recommended.

Horticulture New Zealand sought a definition of water efficiency that includes economic, technical and allocative efficiency. The submission of Horticulture New Zealand was supported by Anders Crofoot. Greater Wellington staff comment that “efficient use” is an expression used in section 7(b) of part II of the Resource Management Act and case law is currently developing around it. Staff are reluctant to recommend defining a term that will be subject to ongoing interpretation by the courts according to case law. Further, more detailed and specific provisions are to be included in the regional plan around efficient use of water, where it will be more appropriate to provide any specific meanings intended in the regional plan. The meaning given to efficient use in relation to policy 18 should remain in the Regional Policy Statement because it is the specific meaning intended to apply in that provision.

Horticulture New Zealand also requested that policies on efficient use of water include a definition for reasonable domestic take, encouragement of water recycling and water management plans where practicable, and provision for research on the state and availability of water resources in the region. The submitter also wanted the proposed Regional Policy Statement to direct that provision for demand side efficiencies are made in the region. Greater Wellington staff note the term reasonable domestic take is not used in a policy in the proposed Regional Policy Statement, although the term “individual’s reasonable domestic needs” is mentioned in the explanation to policy 19. It is a term used in the Act and staff recommend that case law around it be relied on rather than defining it in the Regional Policy Statement. Policy 43 requires, when considering an application for resource consent, particular regard to be had to demand management measures. Demand management measures, water reuse and/or water recycling are addressed in policy 44. Provision for research on the state and availability of water resources in the region are matters to be considered when the Regional Monitoring Strategy is reviewed (see chapter 5 of the Regional Policy Statement), and annual monitoring reports and the six yearly state of the environment report are prepared.

Kapiti Coast District Council agreed with the issues raised subject to a concern that climate change is not mentioned. Greater Wellington staff note that climate change is discussed in the second paragraph on page 34 but is addressed in greater detail in section 3.8. No changes are recommended.

Masterton District Council sought that the objectives and policies in section 3.4 be amended to provide a better balance for the use of the waterways. Greater Wellington staff comment that objective 1 includes meeting the range of uses and values for which water is required. This objective encompasses the meeting of all uses and values of water. Objective 14 also encompasses all uses of water with the proviso that water is used efficiently. The submitter stated it is vitally important for economic and social well being that one of the purposes of waterways is the “conveyancing” of water. Greater

Wellington staff note that flow augmentation can provide opportunities for water use to be more efficient and it's agreed that this should be promoted in the Regional Policy Statement. Accordingly, policy 18 and its explanation are amended to promote augmentation of river flows. Specific matters relating to policies 11 (including provision to prevent flooding and damage to private property), 15, 16, 18 are addressed in response to submissions on these policies.

Masterton District Council sought that the chapter be re-written to reflect the language and presumption of the Resource Management Act 1991. Greater Wellington staff note that sections 59 to 62 of the Resource Management Act identify what's appropriate for a regional policy statement. Section 61, in particular, refers to functions under section 30, the provisions of Part II and the duty under section 32 and regulations. The proposed Regional Policy Statement has been prepared in accordance with these provisions. Part II of the Resource Management Act mentions ... *avoid, remedy or mitigate* ... in section 5(2), and it's not necessary to repeat what is already stated in the Resource Management Act. The submission of Masterton District Council was supported in part by Horticulture New Zealand.

Meridian Energy sought the inclusion of a new issue "Water is essential for sustaining people and communities". Their submission was supported by Genesis Energy, Horticulture NZ, Mighty River Power and Masterton District Council. Greater Wellington staff agree that the "issue" suggested by the submitter is a statement of fact about the relationship between water and people and communities. However, it does not identify a resource management issue.

Mighty River Power sought retention of recognition of activities that can generate poor ecosystem function in rivers, lakes, and wetlands. They requested that the explanation be amended to include that the effects of an activity can be considered where they can be offset by another form of environmental compensation, using a 'no net loss' approach. Greater Wellington staff comment that section 3.4 is not the appropriate place to address environmental compensation. This section provides introductory information about fresh water in the region and current uses. It's not appropriate to include in the introductory parts of section 3.4 the policy response that the submitter is suggesting. Mighty River Power also sought inclusion of a new 'plan' policy that recognises the economic and social benefits obtained from the use of water resources. Greater Wellington staff note that the social and economic benefits of renewable energy, which includes energy produced from hydro sources, are included in policy 6. Mighty River Power's requests on issue 2 and objective 12 are responded to in the reports on those provisions. The submissions by Mighty River Power were supported by Winstone Aggregates (in part), Horticulture New Zealand, Genesis Energy and Meridian Energy Limited.

Porirua City Council supported the environmental focus of the fresh water objectives and policies. The support is noted.

David Scott sought that Greater Wellington co-ordinate and make potable water supplies available to all districts within the region and that water metering of individual ratepayers not be a management tool to ration drinking supply by price. Staff note that Greater Wellington makes potable water available to Porirua City, Wellington City, Hutt City and Upper Hutt City under different legislation than the Resource Management Act, which the Regional Policy Statement is prepared under. The Regional Policy Statement does not have the mandate to direct metering of individual ratepayers.

South Wairarapa District Council sought recognition that some urban water supplies are supplied by rivers, for example Greytown and indirectly Martinborough. Recognising that some urban water supplies are from rivers can be included in the introduction on page 34 by referring to “water supply from rivers and groundwater”. The submitter also noted the linking of poor water quality with farming/agriculture is implied through the document and stated that while agricultural land use has an impact on water quality, it is just one of many factors and needs to be assessed against the economic and community benefit. The submission was supported by Anders Crofoot, Federated Farmers of New Zealand, and Masterton District Council. Greater Wellington staff agree that there are many factors that affect water quality and the most important of these in the region are mentioned in section 3.4. The Resource Management Act requires social and economic costs and benefits to be assessed for all provisions in the proposed Regional Policy Statement and this is done in the section 32 reports. In all decision making under the Resource Management Act, section 5 requires the consideration of social and economic wellbeing.

The **Tararua Tramping Club** supported policies in this section to eliminate pollution of water and more generally to protect the natural ecosystems. The support is noted.

Wairarapa Regional Irrigation Trust stated that it was unhelpful to speculate on causes of elevated nitrate levels without evidence. They also considered the statement that Wairarapa ground water levels are declining year by year without some indication of a reason was not helpful. The submitter commented that the same is true of the statement on low flows in surface water. The submission was supported by Horticulture New Zealand and Federated Farmers of New Zealand. Greater Wellington staff comment that there is evidence on the causes of elevated nitrogen levels in the Wellington region. There is also evidence on declining groundwater levels in some aquifers and declining stream flows being due to water takes. The relevant technical material is referred to in the supporting section 32 reports. The proposed Regional Policy Statement is a management document and it's not appropriate to include detailed technical

information that supports it. The Wairarapa Regional Irrigation Trust supported recognition that water resources are limited and in some cases fully allocated and the impact of climate change.

Wellington City Council supported the objectives, policies and methods relating to fresh water, subject to consideration of a stormwater strategy. Greater Wellington staff note that Wellington City Council's submissions on a stormwater strategy is addressed under policy 39.

Wellington Fish and Game Council stated that their concerns about the introduction to fresh water and issues could be addressed by noting the impact on water ways due to increasing sediment loads as a result of some land uses. The submission was opposed by Horticulture New Zealand. Greater Wellington staff comment that the implications of earthworks and loss of soil from the land, leading to increased sediment in rivers is raised in the introduction to the soil and minerals topic in section 3.11. It is not necessary to repeat this material in section 3.4 because the policy response (eg. policy 14) emerges from both sections.

The **Wellington Residents Coalition** stated that the present system of retaining metering for industrial, commercial and large residential users only, should be retained, and sensible measures introduced to reduce wasteful consumption. The Regional Policy Statement is prepared under the Resource Management Act. It only has the mandate to require water metering in situations when resource consents are required to take water from a natural water body.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/11	Reject
CentrePort Wellington	23/5	Accept in part
Federated Farmers of New Zealand	35/11	Reject
Higgins Group Holdings Ltd	48/3	Reject
John Christopher Horne	49/10	Reject
Horticulture New Zealand	50/9	Reject
Kapiti Coast District Council	56/5	Accept in part
Masterton District Council	74/3	Accept in part Also see recommendations for policies 11, 15, 16 and 18

Submitter	Submission	Recommendation
Masterton District Council	74/4	Reject
Meridian Energy Limited	82/8	Reject
Mighty River Power	83/9	Reject
Mighty River Power	83/10	Reject
Porirua City Council	100/4	Accept
David Scott	109/1	Reject
South Wairarapa District Council	112/13	Accept in part
Tararua Tramping Club	114/7	Accept
Wairarapa Regional Irrigation Trust	127/2	Accept in part
Wellington City Council	131/6	Accept See recommendation for policy 39
Wellington Fish and Game Council	133/8	Reject
Wellington Residents Coalition	136/1	Accept in part

All further submissions are accepted or rejected accordingly.

(c) **Recommended changes**

Amend paragraph 2 on page 34 as follows:

Accommodating people's needs for water is becoming more and more difficult because some water resources in the region are already fully allocated and others are close to full allocation. In the Wairarapa, the amount of water taken for farm pasture irrigation has more than doubled over the last 10 years and increasing populations in the region's urban areas means demand for water supply from rivers, lakes and groundwater is expected to increase. The pressure on water resources is also likely to increase as a result of climate change. Some predicted effects are that the central and eastern Wairarapa will become drier, and droughts will occur more frequently and persist for longer periods.

2.35 Section 3.4 Fresh water - Issue 1: Pollution is affecting water quality in water bodies

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/12	Sought Issue 1 be replaced with the following: 1. Discharges may cause pollution and adversely affect water quality in water bodies Or alternatively amend as follows: 1. Pollution is affecting water quality in water bodies The water quality of rivers and streams, lakes, wetlands and groundwater in the region can be being polluted by discharges.
F22/28	Anders Crofoot	Support
Horticulture New Zealand	50/10	Sought that Issue 1 be amended to read: 'Discharges may cause pollution and adversely affect water quality in water bodies.' And 'and by intensive land uses' be removed. Also sought that non point source and point source discharges be differentiated and defined in the issue statement.
F22/29	Anders Crofoot	Support
F23/29	Federated Farmers of New Zealand	Support
F24/57	Masterton District Council	Support
Wellington Fish and Game Council	133/9	Supported

(a) Discussion

Federated Farmers of New Zealand sought a new issue 1 that “discharges may cause pollution and adversely affect water quality in water bodies”, or alternatively “The water quality of rivers and streams, lakes, wetlands and groundwater in the region can be polluted by discharges”. The submission was supported by Anders Crofoot. Greater Wellington staff comment that pollution of water is from discharges and run-off from the land. The degree to which land run-off causes pollution is dependant on land use, hence its appropriate to

refer to land use in the issue. Urban land use and intensive farming are contributing to water pollution in the Wellington region. It's appropriate to make a change to issue 1 clarifying that land uses are resulting in pollution of water ways, including urban land uses and intensively farmed land. Intensively farmed land is defined in response to the submission from Federated Farmers of New Zealand in section 2.202 of this report.

Horticulture New Zealand sought that issue 1 be amended to read 'Discharges may cause pollution and adversely affect water quality in water bodies.' The submitter sought removal of 'and by intensive land uses'. The submitter also sought that non point source and point source discharges be differentiated and defined in the issue. The submission was supported by Anders Crofoot, Federated Farmers of New Zealand and Masterton District Council. Greater Wellington staff consider it's unnecessary to include the qualifier "may" because the statement is appropriate as it stands. Pollution is the result of contaminants in discharges and run-off from the land. The degree to which land run-off causes pollution is dependant on land use, hence its appropriate to refer to land use in the issue. Urban land use and intensive farming are contributing to water pollution in the Wellington region. It's appropriate to make a change to issue 1 clarifying that land uses are resulting in pollution of water ways, including urban land uses and intensive farmed land. Intensively farmed land is defined in response to the submission from Federated Farmers of New Zealand in section 2.202 of this report. In this issue the term discharges can remain. It is defined in the Resource Management Act without the qualification of point or non-point source.

Wellington Fish and Game Council supported issue 1. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/12	Accept in part
Horticulture New Zealand	50/10	Accept in part
Wellington Fish and Game Council	133/9	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend Issue 1 as follows:

1. Pollution is affecting water quality in water bodies

The water quality of rivers and streams, lakes, wetlands and groundwater in the region is being polluted by discharges and intensive land uses, including uses of urban land and intensively farmed land.

2.36 Section 3.4 Fresh water - Issue 2: Poor ecosystem function in rivers, lakes and wetlands

Submitter	Submission	Summary
Mighty River Power	83/11	Sought an additional clause to issue 2 to state that the effects of an activity can be considered where they can be offset by another form of environmental compensation, using a 'no net loss' approach.
F1/65	Winstone Aggregates	Support in part
F19/14	Horticulture New Zealand	Support
Wellington Fish and Game Council	133/10	Supported

(a) Discussion

Mighty River Power sought an additional clause to issue 2 to state that the effects of an activity can be considered where they can be offset by another form of environmental compensation, using a 'no net loss' approach. Their submission was supported by Winstone Aggregates (in part) and Horticulture New Zealand. Greater Wellington staff comment that one of the criteria used to develop issues in the proposed Regional Policy Statement is that it must be a resource management issue (ie., it must relate to a natural or physical resource). The issue suggested by Mighty River Power is in keeping with a policy response to a resource management issue. Hence, the matter they have raised is addressed in that context (see the response to policy 11.)

Wellington Fish and Game Council supported issue 2. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Mighty River Power	83/11	Reject
Wellington Fish and Game Council	133/10	Accept

All further submissions are rejected accordingly.

(c) Recommended changes

No change to issue 2 is recommended.

2.37 Section 3.4 Fresh water - Issue 3: There is increasing demand on limited water resources

Submitter	Submission	Summary
TrustPower Limited	124/13	Sought that be amended to read: 'There is a limited amount of water in rivers and groundwater aquifers available for human use and demand is increasing. The amount of water taken for farm pasture irrigation has more than doubled over the last 10 years. Increasing populations in the region's urban areas also means increased demand for water, reducing the availability of water for other uses with national or regional benefits such as renewable energy developments.'
F19/15	Horticulture New Zealand	Support in part
Wellington Fish and Game Council	133/11	Supported

(a) Discussion

TrustPower Limited sought that the last sentence of issue 3 be amended to read: 'Increasing populations in the region's urban areas also means increased demand for water, reducing the availability of water for other uses with national or regional benefits such as renewable energy developments.' The submission was supported by Horticulture New Zealand. Greater Wellington staff comment that in the Wellington region irrigation occurs in lowland plains and valleys where no renewable energy developments currently exist or are proposed. No change is recommended in response to the submission.

Wellington Fish and Game Council supported issue 3. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
TrustPower Limited	124/13	Reject
Wellington Fish and Game Council	133/11	Accept

The further submission from Horticulture New Zealand is rejected accordingly.

(c) Recommended changes

No change to issue 3 is recommended.

2.38 Objective 12

Submitter	Submission	Summary
Coastland Shopping Limited	24/1	Sought that objective 12 be retained. Noted that the objective is viewed positively as aligns with the submitter's interest in promoting a range of activities in Paraparaumu Town Centre.
Horticulture New Zealand	50/11	Sought that objective 12 and relevant policies be amended to differentiate between water quality and water quantity.
F22/30	Anders Crofoot	Support
F23/31	Federated Farmers of New Zealand	Support
Kapiti Coast District Council	56/6	Supported objective 12 regarding safe-guarding the quantity and quality of freshwater but requested that greater consideration be given to water supplies, and the impact of development on these supplies and associated policies.
Korokoro Environment Group	65/3	Sought retention of the objective.
Meridian Energy Limited	82/9	Sought that objective 12 be amended to read: objective 12 Freshwater is available for use and development and the quantity or quality of water: (a) meet the range of uses and values for which water is required; (b) safeguarding the life supporting capacity of water bodies; and (c) meets the reasonably foreseeable needs of future generations Or alternatively sought a new objective or make other amendments to acknowledge the value of water as a natural resource essential and available for sustainable use and development.
F26/9	Mighty River Power	Support

Submitter	Submission	Summary
F24/76	Masterton District Council	Support
Mighty River Power	83/12	Sought the addition of a clause which recognises that adverse effects can be remedied or mitigated by environmental compensation, using a 'no net loss' approach.
F1/66	Winstone Aggregates	Support in part
F16/16	Genesis Energy	Support
South Wairarapa District Council	112/14	Stated that this was the only objective that recognises that water is required for the social and economic wellbeing of people and communities.
Wellington Fish and Game Council	133/12	Opposed. Stated that concerns could however be addressed by adding to the objective: (d) "is maintained to meet recreational values". Also stated that the policies and methods under objective 12 were opposed, but concerns could be met by making changes to policy 11 as requested and by including a new policy and methods which addresses the issues of non point source pollution from agriculture and horticulture, on freshwater resources.
F17/23	Meridian Energy Limited	Oppose
F19/17	Horticulture New Zealand	Oppose
F22/5	Anders Crofoot	Oppose
F24/127	Masterton District Council	Oppose
Wellington City Council	131/55	Supported objective 12

(a) Discussion

Coastland Shopping Limited sought that objective 12 be retained. Staff recommend retaining objective 12 as proposed.

Horticulture New Zealand sought that objective 12 and relevant policies be amended to differentiate between water quality and water. The submission was supported by Anders Crofoot and Federated Farmers of New Zealand. Greater Wellington staff comment that the reason why objective 12 addresses water quality and quantity is to better integrate these two important elements of water management. Changes to water quality can affect water availability and changes to quantity affect water quality. The purpose of a regional policy statement includes “ ... to achieve integrated management of ... natural ... resources ... ”. Therefore, it is appropriate to treat water quality and quantity together where it is feasible to do so. No change is recommended in response to the submission.

Kapiti Coast District Council supported objective 12 regarding safeguarding the quantity and quality of freshwater but requested that greater consideration be given to water supplies, and the impact of development on these supplies and associated policies. Various policies and methods in the Regional Policy Statement include consideration of water supplies and these include policy 7, policy 11, policy 12, policy 19, policy 39, policy 43 and policy 44. No change is recommended.

Korokoro Environment Group sought retention of objective 12. Staff recommend retaining objective 12 as proposed.

Meridian Energy Limited sought an amendment to objective 12 to read “Freshwater is available for use and development and the quantity or quality of water .. ”, or alternatively a new objective or make other amendments to acknowledge the value of water as a natural resource essential and available for sustainable use and development. The submission was supported by Mighty River Power and Masterton District Council. Greater Wellington staff note that section 5 of the Act sets out the meaning of sustainable management which includes “ ... use, development and protection of natural and physical resources .. ”. Objective 12 makes it clear that fresh water will be managed to meet the range of uses and values for which water is required. Hence, no change is needed.

Mighty River Power sought the addition of a clause which recognises that adverse effects can be remedied or mitigated by environmental compensation, using a ‘no net loss’ approach. The submission was supported by Winstone Aggregates and Genesis Energy. The Regional Policy Statement objectives are intended as outcomes for the region’s environment not statements of the way these outcomes will be achieved. The courses of action to achieve outcomes are matters for policy and this request from the submitter is addressed specifically in the report on policy 11.

South Wairarapa District Council stated that this was the only objective that recognises that water is required for the social and economic wellbeing of people and communities. Greater Wellington

staff comment that objectives 13 and 14 also include elements intended for the social and economic well being of people and communities.

Wellington Fish and Game Council stated their concern about objective 12 could be addressed by adding to the objective (d) “is maintained to meet recreational values”. The submitter also sought changes to policy 11 and a new policy and methods which address the issues of non-point source pollution. The submission was opposed by Meridian Energy Limited, Horticulture New Zealand, Anders Crofoot and Masterton District Council. Greater Wellington staff consider that recreation is a use and value of fresh water which is accommodated in part (a) of the objective. The concern about policy 11 is addressed in the report on policy 11. Policies and methods in the Regional Policy Statement do not distinguish between point source and non point source pollution. Hence relevant policies (11, 13, 14, 15, 16, 17, 39, 40 and 41) have implications for non-point source discharges and staff do not recommend any additional policy. The proposed methods also apply to non-point source discharges (eg. methods 8, 29, 30, 33, 34, 35).

Wellington City Council supported objective 12. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Coastland Shopping Limited	24/1	Accept
Horticulture New Zealand	50/11	Reject
Kapiti Coast District Council	56/6	Accept in part
Korokoro Environment Group	65/3	Accept
Meridian Energy Limited	82/9	Reject
Mighty River Power	83/12	Reject
South Wairarapa District Council	112/14	Accept in part
Wellington Fish and Game Council	133/12	Reject
Wellington City Council	131/55	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

No changes are recommended to objective 12.

2.39 Objective 13

Submitter	Submission	Summary
Horticulture New Zealand	50/12	Sought that objective 13, and relevant policies be amended to differentiate between water quality and water quantity.
F22/31	Anders Crofoot	Support
Wellington Fish and Game Council	133/13	Supported. But sought clarification that also included streams and creeks. Generally supported policies and methods under objective, except policy 17.
Wellington City Council	131/56	Supported objective 13

(a) Discussion

Horticulture New Zealand sought that objective 13 and relevant policies be amended to differentiate between water quality and water quantity. The submission of Horticulture New Zealand was supported by Anders Crofoot. Objective 13 and its relevant policies do not address either water quality or water quantity. These provisions address aquatic ecological function. Hence, no changes along the lines sought by the submitter are necessary.

Wellington Fish and Game Council supported objective 13. Greater Wellington staff consider clarification that it includes streams and creeks is not needed because the definition of “rivers” under the Resource Management Act includes these water bodies.

Wellington City Council supported objective 13. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Horticulture New Zealand	50/12	Reject
Wellington Fish and Game Council	133/13	Accept in part
Wellington City Council	131/56	Accept

The further submission from Anders Crofoot is rejected accordingly.

(c) Recommended changes

No changes to objective 13 are recommended.

2.40 Objective 14

Submitter	Submission	Summary
Horticulture New Zealand	50/13	Sought that objective 14 and relevant policies be amended to differentiate between water quality and water quantity.
F22/32	Anders Crofoot	Support
Meridian Energy Limited	82/10	Stated that as an alternative to amending objective 12, objective 14 be amended to read 'Fresh water is available for use and development and is used efficiently and is not wasted.'
F26/10	Mighty River Power	Support
F24/77	Masterton District Council	Support
Wellington Fish and Game Council	133/14	Supported. But opposed the specification of "non-regulatory" standards as applied to policy 65.
Wellington City Council	131/57	Supported objective 14.

(a) Discussion

Horticulture New Zealand sought that objective 14 and relevant policies be amended to differentiate between water quality and water quantity. The submission of Horticulture New Zealand was supported by Anders Crofoot. Objective 14 and the relevant policies address efficient use of water in relation to water quantity. Greater Wellington staff consider no change is needed.

Meridian Energy Limited stated that as an alternative to amending objective 12, objective 14 be amended to read 'Fresh water is available for use and development and is used efficiently and is not wasted.' The submission was supported by Mighty River Power and Masterton District Council. Greater Wellington staff note that the objective targets efficient use of water, since that is what issue 3 describes. It is unnecessary to include reference to the availability of freshwater for use and development since that is already provided by section 5 of the Act and is addressed through objective 12.

Wellington Fish and Game Council and **Wellington City Council** supported objective 14. The opposition of Wellington Fish and Game

Council to “non-regulatory” standards in policy 65 is addressed in the report on policy 65.

(b) Recommended decision

Submitter	Submission	Recommendation
Horticulture New Zealand	50/13	Reject
Meridian Energy Limited	82/10	Reject
Wellington Fish and Game Council	133/14	Accept in part
Wellington City Council	131/57	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

No changes to objective 14 are recommended.

2.41 Section 3.5 Historic heritage

Submitter	Submission	Summary
Kapiti Coast District Council	56/7	Supported the policies which are in accordance with Kapiti Coast District Council's existing approach. In particular, welcomed the further guidance around the criteria for listing buildings and natural heritage in the District Plan Heritage Register
Porirua City Council	100/56	Supported the approach to historic heritage
South Wairarapa District Council	112/15	Noted that the Regional Policy Statement had carefully balanced the language used in the Resource Management Act 1991 with the terminology in the New Zealand Icomos Charter. Supported following of guidance in National documents such as ICOMOS, where this is able to be integrated with the Resource Management Act 1991.
Wellington City Council	131/7	Supported the objectives, policies and methods related to this topic.
Wellington Fish and Game Council	133/15	Supported the issues, policies and methods relating to the maintenance of historic heritage throughout the Greater Wellington region and sought that they be retained.

(a) Discussion

Kapiti Coast District Council, Porirua City Council, South Wairarapa District Council, Wellington City Council and the **Wellington Fish and Game Council** all supported section 3.5 of the Regional Policy Statement. The support for this section is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Kapiti Coast District Council	56/7	Accept
Porirua City Council	100/56	Accept
South Wairarapa District Council	112/15	Accept
Wellington City Council	131/7	Accept
Wellington Fish and Game Council	133/15	Accept

(c) Recommended changes

There are no recommended changes to section 3.5.

2.42 Objective 15

Submitter	Submission	Summary
Winstone Aggregates	15/12	Sought objective 15 be amended as follows: Historic heritage is identified and protected from inappropriate subdivision, use and development.
F23/32	Federated Farmers of New Zealand	Support in part
Federated Farmers of New Zealand	35/13	Sought objective 15 be amended as follows: Historic heritage sites are identified and any effects on them of inappropriate subdivision use and development are avoided remedied or mitigated
F19/18	Horticulture New Zealand	Support
F22/33	Anders Crofoot	Support
F24/36	Masterton District Council	Support

Submitter	Submission	Summary
New Zealand Historic Places Trust	87/6	Sought retention of objective 15.
Transpower New Zealand Limited	123/9	Sought retention of objective 15 without modification.
F5/12	PowerCo Limited	Support
Wellington City Council	131/58	Supported objective 15.

(a) Discussion

Winstone Aggregates sought replacement of the word “modification” with “subdivision” so the objective would be consistent with section 6(f) of the Resource Management Act. Federated Farmers of New Zealand supported this submission. Staff comment that “inappropriate subdivision, use and development” is already stated in the Act and it is unnecessary to repeat it in the Regional Policy Statement. The regionally significant resource management issue for historic heritage is the loss of heritage values as a result of inappropriate modification, use and destruction of historic heritage. Further, while it is a different word, the concept is consistent with section 6(f) of the Act. Staff therefore recommend that the word “modification” remain in objective 15.

Federated Farmers of New Zealand supported “further identification and understanding of historic heritage...in order to ensure values are known,” but they also believed use of the word “modification” is inconsistent with the Resource Management Act. They have requested a substantial rewording of the objective, but have not provided any further explanation as to why. Anders Crofoot, Horticulture New Zealand and Masterton District Council supported this submission. As stated above, staff consider use of the word “modification” is appropriate, as it addresses the regionally significant issue for historic heritage and provides further direction beyond what is stated in the Act.

New Zealand Historic Places Trust, Transpower New Zealand Limited and **Wellington City Council** supported the objective without change. **PowerCo Limited** supported the submission of **Transpower New Zealand Limited**. The support for this objective is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/12	Reject
Federated Farmers of New Zealand	35/13	Reject
New Zealand Historic Places Trust	87/6	Accept
Transpower New Zealand Limited	123/9	Accept
Wellington City Council	131/58	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

There are no recommended changes to objective 15.

2.43 Section 3.6 Indigenous ecosystems

Submitter	Submission	Summary
Winstone Aggregates	15/13	Sought the addition of the following paragraph to the background section of 3.6: Mitigation and remediation for the loss or degradation of an indigenous ecosystem can be achieved through undertaking works elsewhere on the subject site or off site. Such works include but are not limited to planting, covenanting of bush and stream habitats, pest control and environmental monitoring.
Michael James Curtis	27/2	Opposed section. Stated that the Regional Policy Statement did not consider landowner rights and that there was no compensation to landowners who are affected.
F23/33	Federated Farmers of New Zealand	Support in part
Federated Farmers of New Zealand	35/14	Sought inclusion of a paragraph to provide an accurate picture of the stakeholders involved And that the following paragraph be inserted into the introduction section; The Wairarapa today is very different with forest cleared and wetlands drained to make way for farming, forestry, viticulture, cropping and urban development. The dominant species of the Wairarapa Plains are now pasture grasses, shelter belts of macrocarpa, pampas grass, radiata pine and riparian willows (such as crack

Submitter	Submission	Summary
		willow). Sheep, beef, dairy farming, cropping are the main forms of agriculture with viticulture increasing. Primary production is the mainstay of the economic prosperity of the Wairarapa and is dependent on introduced biodiversity for agriculture, horticulture, viticulture and forestry. Therefore, it is important to acknowledge the importance of introduced biodiversity while incorporating indigenous biodiversity into the modified environment. The challenge for the Wairarapa is to find the balance between the benefits provided by introduced species and the threats they present to indigenous biodiversity (or words to this effect)
F19/19	Horticulture New Zealand	Support
F22/34	Anders Crofoot	Support
F24/37	Masterton District Council	Support
Kapiti Coast District Council	56/8	Supported the explicit listing of ecosystem types that are significantly reduced in extent and therefore a priority for action. Stated this provides clear guidance to decision makers by eliminating uncertainty.
Mighty River Power	83/13	Sought amendments to emphasise the maintenance, and where appropriate, the enhancement of the overall biodiversity of the region.
F17/24	Meridian Energy Limited	Support in part
Porirua City Council	100/57	Supported the approach to indigenous ecosystems
Tararua Tramping Club	114/8	Agreed with the Statement's description of this topic
Wellington Botanical Society	130/3	Requested amendment to include discussion of biodiversity, biodiversity values, rationale for inclusion of only significant biodiversity values, the relationship with climate change, the contribution of indigenous biodiversity to 'sense of place', and an explanation that some species indigenous to New Zealand are not indigenous to the Wellington region and may pose a threat. Supported the inclusion of the impact of human

Submitter	Submission	Summary
		activities and the gradual erosion of ecosystem sustainability. Also requested the amendment of reference to the Tararua and Orongogongo ranges in paragraph 3 to reference to the Tararua, Rimutaka and Aorangi ranges.
Wellington Botanical Society	130/4	Requested reinstatement of poor knowledge of the health of indigenous ecosystems as a significant resource management issue or in the alternative a discussion of progress made on this issue by territorial authorities.
F1/96	Winstone Aggregates	Oppose
Wellington City Council	131/8	Supported the objectives, policies and methods related to this topic.
Wellington Fish and Game Council	133/16	Opposed the issues, policies and methods relating to indigenous ecosystems. Stated that all ecosystems and biodiversity values should be protected including trout spawning values and all wetlands, including man made.
F1/105	Winstone Aggregates	Oppose
F17/25	Meridian Energy Limited	Oppose
F22/6	Anders Crofoot	Oppose
F24/134	Masterton District Council	Oppose

(a) Discussion

Winstone Aggregates sought that the section be amended to provide for environmental compensation. Greater Wellington staff note that section 3.6 provides background and introductory information about indigenous ecosystems in the region. It's not appropriate to include in the introductory parts of section 3.6 the policy response that the submitter is suggesting. Greater Wellington staff consider that environmental compensation is a relevant policy matter to be considered during preparation of the Regional Policy Statement and it is therefore addressed in conjunction with the submitters request on policy 46.

Michael James Curtis opposed the entire section as the Regional Policy Statement did not consider landowner rights and compensation.

The Regional Policy Statement has been prepared to achieve the purpose of the Resource Management Act, which is to promote the sustainable management of natural and physical resources in the region. Section 85(2) of the Resource Management Act allows any person having an interest in land to challenge any provision or proposed provision of a plan or proposed plan if that provision or proposed provision renders that interest in land incapable of reasonable use. However, the Resource Management Act does not have any provision for compensation of the loss of landowner rights that could be addressed through the indigenous ecosystems provisions in the Regional Policy Statement. The submission was supported in part by Federated Farmers of New Zealand.

Federated Farmers of New Zealand requested the inclusion of wording that recognised that landowners, conservation groups, government agencies and advocacy agencies all have a part to play in the protection and restoration of indigenous biodiversity. They also sought the inclusion of a statement that acknowledges the fact that the mainstay of the Wairarapa economy is primary production based on introduced plants and animals and that the importance of introduced biodiversity should be acknowledged. Greater Wellington staff agree that all sectors of the community have a role to play in protecting and restoring indigenous biodiversity and this is reflected in the explanation to Policy 64: Supporting environmental enhancement initiatives – non-regulatory. Because section 3.6 provides introductory and background material to indigenous ecosystems in the Wellington region, the inclusion of a paragraph specifically highlighting the economic role of agriculture in part of our region is not recommended. Anders Crofoot, Horticulture New Zealand and the Masterton District Council supported the submission of Federated Farmers of New Zealand.

Kapiti Coast District Council supported the explicit listing of ecosystem types that are significantly reduced in extent and therefore a priority for action. The support is noted.

Mighty River Power supported section 3.6 in part. However, they sought an amendment to change a perceived emphasis on “absolute” protection of the region’s ecosystems and habitat to “no net loss”. Greater Wellington staff comment that section 3.6 provides a context for the subsequent objective, policies and methods and, therefore, it is not appropriate to include reference to “no net loss”. The matter is discussed later under objective 16, policy 22 and policy 46. Meridian Energy Limited supported the submission by Mighty River Power.

Porirua City Council supported the approach to indigenous ecosystems. The support is noted.

The **Tararua Tramping Club** supported Section 3.6. The support is noted.

The **Wellington Botanical Society** sought a rewriting of section 3.6 to provide a better basis for objective 16. They suggest that the terms “biodiversity” and “biodiversity values” should be introduced in this section as they are used in policies 22 and 23. Greater Wellington staff agree and it is proposed to make a minor amendment to this section to incorporate the term “biodiversity values”.

The Wellington Botanical Society also sought an explanation for why these policies address only “significant” biodiversity values and the consequences of doing so. Greater Wellington staff note that section 6(c) of the Resource Management Act states that when exercising functions and powers (which includes preparing the Regional Policy Statement) Greater Wellington shall recognise and protect significant indigenous vegetation and significant habitats of indigenous fauna. Policies 22 and 23 state how Greater Wellington is giving effect to these parts of the Resource Management Act in the Regional Policy Statement.

The Wellington Botanical Society noted that there was no mention of the relationship between climate change and indigenous biodiversity or the associated impacts. While climate change may have an effect on indigenous ecosystems it was not considered to be a regionally significant resource management issue and there is no legislative mandate to specifically address climate change in relation indigenous biodiversity, however policies 28 and 50 do address climate change effects in relation to natural hazard risk.

The Wellington Botanical Society noted that section 3.6 does not mention the contribution of indigenous ecosystems to “sense of place”. While Greater Wellington staff do not see this as a regionally significant resource management issue for this chapter we do consider that the intrinsic value of ecosystems and the contribution they make toward the region’s natural character need to be mentioned here, to be consistent with changes made as a result of changes made to chapter 2 based on this submission and have amended the text accordingly. We note that policies 24 and 26 in the Landscape section are intended to take account of the contribution that indigenous ecosystems make to the region’s landscapes.

The Wellington Botanical Society also requested the inclusion of an explanation that some plant species that are indigenous to New Zealand are not indigenous to the Wellington region and can pose a threat to local species and ecosystems. Staff note this observation and agree with it’s validity but consider that this level of detail is not appropriate for a Regional Policy Statement.

The Wellington Botanical Society recommended altering reference to the Tararua and Orongorongo ranges to the Tararua, Rimutaka and Aorangi ranges. Staff agree with this suggestion.

The Wellington Botanical Society also requested the inclusion of an additional issue to the effect that there is a need to develop methods for measuring change in indigenous ecosystems. Greater Wellington staff comment that when developing issues for the Regional Policy Statement, one of the criteria applied was that issues had to relate directly to a natural or physical resource. Hence, there are no issues about monitoring in the Regional Policy Statement. It's agreed that developing methods for measuring change in indigenous ecosystems is needed but this will be addressed through development of a regional monitoring strategy, which is proposed in chapter 5 of the Regional Policy Statement.

The Wellington Botanical Society also requested inclusion of *poor knowledge of the health of indigenous ecosystems* as a significant resource management issue or in the alternative a discussion of progress made on this issue by territorial authorities. Staff do not consider that this is a significant resource management issue for the same reason identified in the previous paragraph. Winstone Aggregates opposed this submission point.

Wellington City Council supported the objectives, policies and methods related to indigenous ecosystems. The support is noted.

The **Wellington Fish and Game Council** opposed the indigenous ecosystem section in its entirety because “all ecosystems and biodiversity values should be protected including trout spawning values and all wetlands, including man-made”. Greater Wellington staff recommend rejecting this submission as section 30 of the Resource Management Act requires Greater Wellington to address the issue of indigenous ecosystems. Trout are not indigenous to New Zealand and man-made wetlands may not be habitats with significant biodiversity values. Winstone Aggregates, Meridian Energy Limited, Anders Crofoot and Masterton District Council opposed the submission.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/13	Reject
Michael James Curtis	27/2	Reject
Federated Farmers of New Zealand	35/14	Reject
Kapiti Coast District Council	56/8	Accept
Mighty River Power	83/13	Reject
Porirua City Council	100/57	Accept
Tararua Tramping Club	114/8	Accept

Submitter	Submission	Recommendation
Wellington Botanical Society	130/3	Accept in part
Wellington Botanical Society	130/4	Reject
Wellington City Council	131/8	Accept
Wellington Fish and Game Council	133/16	Reject

All further submissions are accepted or rejected accordingly.

(c) **Recommended changes**

Amend section 3.6 as follows:

3.6 Indigenous ecosystems

An ecosystem may be described as a community of plants, animals and micro-organisms interacting with each other and their surrounding environment.

As well as contributing to the region’s natural character and having their own intrinsic values, Healthy ecosystems provide us with life’s essentials – such as plants and animals for food, fibre for clothing, timber for construction. This is true even in an industrialised age, although the connections are less immediately obvious. Healthy ecosystems supply us with ‘services’ that support life on this planet – such as:

- Processes the purify air and water
- Decomposition and detoxification of wastes
- Creation and maintenance of productive soils
- Reduction of the impact of climate extremes
- Capture of carbon and maintenance of a functioning atmosphere.

Ecosystems are dynamic (constantly changing) and the many diverse natural processes that drive ecosystems are as important as the ~~species~~ biodiversity values within them. In addition, all parts of an ecosystem are interconnected

The Wellington region has a distinctive range of ecosystems – such as forests, mountains, wetlands, lakes, rivers and coastal and marine ecosystems. Some ecosystems have a high degree of indigenousness - such as the Tararua, Rimutaka and Aorangi ~~and~~

Orongorongo ranges, while others are dominated by exotic species such as pastoral farmlands.

.....

2.44 Section 3.6 Indigenous ecosystems - Issue 2: The region's indigenous ecosystems are under threat

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/15	Sought Issue 2 be amended as follows: 'Monitoring change in the quality of ecosystems at a regional scale is difficult' And reference to technical reports and monitoring results be included in footnotes
F22/35	Anders Crofoot	Support
F24/38	Masterton District Council	Support

(a) Discussion

Federated Farmers of New Zealand sought that issue 2 be deleted and replaced with 'Monitoring change in the quality of ecosystems at a regional scale is difficult'. The submission was supported by Anders Crofoot. One of the criteria used to develop issues in the proposed Regional Policy Statement was that they must be a resource management issue (that is, they must relate to natural and physical resources). Therefore, Greater Wellington staff recommend rejecting this submission point. It is noted that chapter 5 of the Regional Policy Statement identifies the procedures to be used for monitoring, including the development of a regional monitoring strategy. Federated Farmers of New Zealand also sought the insertion of a footnote with a link to the technical reports or studies to support the issue. Greater Wellington staff comment that the Regional Policy Statement is a statutory planning document for managing resources. References to supporting documents are in the section 32 reports, which are prepared under the Resource Management Act and released at the same time as the proposed Regional Policy Statement. The technical documents confirm that the region's remaining indigenous ecosystems are under threat. The submission was supported by Masterton District Council.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/15	Reject

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

There are no recommended changes to issue 2

2.45 Objective 16

Submitter	Submission	Summary
Winstone Aggregates	15/14	Sought objective 16 be amended as follows: Adverse effects on indigenous ecosystems and habitats with significant biodiversity values are avoided, remedied or mitigated.
F19/20	Horticulture New Zealand	Support
F23/34	Federated Farmers of New Zealand	Support in part
Federated Farmers of New Zealand	35/16	Sought objective 16 be amended as follows: Indigenous ecosystems and habitats with significant biodiversity values are maintained and enhanced
F22/35	Anders Crofoot	Support
F24/39	Masterton District Council	Support
Lower Hutt Forest and Bird Protection Society	66/2	Requested a new policy to read 'Support tangata whenua and the community to identify and establish ecological corridors.'
F24/71	Masterton District Council	Oppose
Masterton District Council	74/16	Stated that the Resource Management Act used the words "maintenance and enhancement" and that this should be reflected and "restored" should be deleted.

Submitter	Submission	Summary
Mighty River Power	83/14	Sought that objective 16 be deleted and replaced with 'Net indigenous biological diversity is maintained or enhanced.'
F16/17	Genesis Energy	Support
F17/26	Meridian Energy Limited	Oppose
Tararua Tramping Club	114/9	Strongly supported
Wellington Botanical Society	130/5	Requested an additional objective with associated policies and rules to protect indigenous ecosystems for reasons other than their biodiversity values
F1/97	Winstone Aggregates	Oppose
Wellington City Council	131/59	Supported objective 16.

(a) Discussion

Winstone Aggregates sought objective 16 be amended as follows: “Adverse effects on indigenous ecosystems and habitats with significant biodiversity values are avoided, remedied or mitigated”. This suggested change reflected the submitter’s view that this section fails to recognise the ability to mitigate or offset loss of indigenous ecosystems through mitigation measures both on and off the site. Greater Wellington staff note that Regional Policy Statement objectives are outcomes specifically intended for the Wellington region’s environment. The objective put forward by the submitter is a restatement of section 5(2)(c) of the Resource Management Act, which gives part of the meaning of sustainable management, and applies to every local authority in New Zealand regardless of what’s in the Regional Policy Statement. It’s recommended that the objective remain as it is a statement of the outcome being sought for the Wellington region rather than repeating a statement that the Resource Management Act requires to be applied by every local authority in the country. It is noted that the case law on “avoid, remedy or mitigate” already encompasses environmental compensation as a course of action that the Resource Management Act endorses. Hence environmental compensation is considered in a policy context in response to Winstone Aggregate’s submission on policy 46. Horticulture New Zealand supported the submission and Federated Farmers of New Zealand supported it in part.

Federated Farmers of New Zealand sought that objective 16 be amended as follows: “Indigenous ecosystems and habitats with significant biodiversity values are maintained and enhanced” rather than “..maintained and restored to a healthy functioning state”. Federated Farmers of New Zealand stated that the goal to restore indigenous ecosystems and habitats with significant biodiversity values was beyond the intent of the Resource Management Act and had the potential to “create perverse environmental outcomes as landowners react to the uncertainty and perceived costs associated with such aggressive goals”. Greater Wellington staff note that Regional Policy Statement objectives are intended as outcomes for the region’s environment and consider “enhanced” is not sufficiently specific nor an adequate response to the two identified issues. It is noted that the purpose of the Resource Management Act is to “promote sustainable management ... ” and achieving this purpose can be through a variety of means, including non-regulatory methods. The submission was supported by Anders Crofoot and Masterton District Council.

Lower Hutt Forest and Bird Protection Society requested a new policy be formulated to read “Support tangata whenua and the community to identify and establish ecological corridors”. Greater Wellington staff do not support the creation of a specific policy addressing ecological corridors and consider the matter is sufficiently covered by other policies. Policy 22 has connectivity criteria to determine significance and policy 46 requires that consideration be given to “maintaining connections within, or corridors between, habitats of indigenous flora and fauna..”. Masterton District Council opposed the submission.

Masterton District Council stated that the Resource Management Act used the words “maintenance and enhancement” and that this should be reflected and “restored” should be deleted. “Restoration” is included in the objective because it is not considered “enhanced” is a sufficiently specific or adequate response to the two identified regionally significant issues for indigenous ecosystems. Greater Wellington staff recommend rejection of this submission point.

Mighty River Power sought that objective 16 be deleted and replaced with ‘Net indigenous biological diversity is maintained or enhanced.’ Greater Wellington staff note there are several elements in the suggested objective that differ from the proposed objective. In particular, the word significant is included in the proposed objective because section 6(c) of the Resource Management Act states that when exercising functions and powers (which includes preparing the Regional Policy Statement) Greater Wellington shall recognise and protect significant indigenous vegetation and significant habitats of indigenous fauna. Objective 16 responds to this statutory direction and Mighty River Power’s suggested alternative fails to do so. Also “restoration” is included in the objective because it is not considered “enhanced” is a sufficiently specific or adequate response to the two

identified issues. Therefore, the submission point is rejected. Genesis Energy supported the submission while Meridian Energy Limited opposed the submission.

Tararua Tramping Club strongly supported the objective. The support is noted.

Wellington Botanical Society requested an additional objective with associated policies and rules to protect indigenous ecosystems for reasons other than their biodiversity values. Winstone Aggregates opposed the submission. Greater Wellington staff note that section 6(c) of the Resource Management Act states that when exercising functions and powers (which includes preparing the Regional Policy Statement) Greater Wellington shall recognise and protect significant indigenous vegetation and significant habitats of indigenous fauna. There is no statutory mandate to include provisions for other purposes.

Wellington City Council supported objective 16. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/14	Reject
Federated Farmers of New Zealand	35/16	Reject
Lower Hutt Forest and Bird Protection Society	66/2	Reject
Masterton District Council	74/16	Reject
Mighty River Power	83/14	Reject
Tararua Tramping Club	114/9	Accept
Wellington Botanical Society	130/5	Reject
Wellington City Council	131/59	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

There are no recommended changes to objective 16.

2.46 Section 3.7 Landscape

Submitter	Submission	Summary
Winstone Aggregates	15/15	Sought deletion of Section 3.7 including objective 17, policies 24-27 and 49, and the relevant methods.

Submitter	Submission	Summary
F15/4	Porirua City Council	Oppose
Michael James Curtis	27/3	Opposed section. Stated that the Regional Policy Statement did not consider landowner rights and that there was no compensation to landowners who are affected.
F15/5	Porirua City Council	Oppose
Kapiti Coast District Council	56/13	Supported objective 17 and policies 24, 25 and 26 in relation to identifying and protecting outstanding natural features and landscapes. Was pleased to see amenity areas and natural features included as well as more general landscapes. The criteria in the policies were considered to be very helpful both when changing district plans and considering resource consents. Stated a concern that there is limited recognition, identification and management for potentially significant or notable landscapes i.e. currently degraded landscapes that could be outstanding. Requested that this be given further consideration in the policy statement.
F1/46	Winstone Aggregates	Oppose
F24/67	Masterton District Council	Oppose
Meridian Energy Limited	82/11	Sought that paragraph 5 be amended to read: '...This potentially affects more sensitive landscapes...' And that the issue be amended to read: 1. The potential for inappropriate subdivision, use and development to modify or destroy the defining characteristics and values of outstanding natural features and landscapes. 2. The potential for inappropriate subdivision, use and development to compromise the defining amenity values of significant amenity landscapes. The adverse effects of some subdivision, land use and development activities have the potential to adversely affect the defining characteristics and values of outstanding natural features and landscapes or the amenity values of significant amenity landscapes.'
F24/79	Masterton District Council	Support

Submitter	Submission	Summary
Porirua City Council	100/5	Supported the approach to identifying and managing significant landscapes. However, noted that at present there was no guidance addressing how territorial authorities are meant to give effect to these policies or address cross-boundary issues, particularly where there may be conflicting views between councils about what qualifies as outstanding or significant. Requested that this issue be addressed by method 49, and that the method is implemented as soon as practicable.
F25/6	New Zealand Defence Force	Oppose
F12/5	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
Diane and Mike Strugnell	113/3	Supported policies that prevent inappropriate modification and destruction of outstanding natural features and landscapes. Requested stronger policies be included that protect the landscapes in the Wellington area from inappropriate development such as wind farms.
F8/11	TrustPower Limited	Oppose
F13/23	Wellington International Airport Limited	Oppose
F17/27	Meridian Energy Limited	Oppose
Tararua Tramping Club	114/10	Strongly supported protecting, maintaining or enhancing the value of outstanding natural features and of landscapes which are outstanding or of significant amenity value.
TrustPower Limited	124/14	Sought that the section be amended to read: 'Within all communities in the region there is an increasing awareness of the distinctive character of

Submitter	Submission	Summary
		local landscapes and natural features, and their importance to our quality of life. Landscapes influence our sense of identity and our experiences of the places we live. Landscape is regarded as a physical resource that shapes and is shaped by many of our activities such as farming, tourism, renewable energy generation, forestry and urban development. For Maori it provides earthly links with ancestors and tribal history, and is intrinsic to the wellbeing of the people of that place. The rohe, or tribal area for tangata whenua, is often associated with landscapes and features and therefore they have powerful cultural significance. Landscape change is inevitable, even without human action. However, the degree of change caused by human activities has been accelerating. The distinctive aspects of the Wellington region's landscapes are at risk of being lost or degraded by inappropriate activities that do not efficiently use the region's renewable resources.'
F23/30	Federated Farmers of New Zealand	Support
Wellington City Council	131/9	Support for the objectives, policies and methods related to this topic, subject to consideration of policies 3, 24, 25, 26 and 27 (35 and 39).
Wellington Fish and Game Council	133/17	Supported the issues, policies and methods relating to landscape and sought that they be retained.

(a) Discussion

Winstone Aggregates sought that section 3.7 including objective 17, policies 24-27 and 49, and the relevant methods be deleted. Porirua City Council opposed this submission. During the review of the Regional Policy Statement the regionally significant issue identified was that inappropriate modification and destruction of outstanding natural features and landscapes and significant amenity landscapes were causing a loss of values associated with these landscapes and features and hence there is a need for the respective objective, policies and methods to address the issue in an integrated manner. Greater Wellington therefore recommends that section 3.7, including the objective, policies and methods are retained.

Michael James Curtis opposed this section as it did not consider landowner rights and also there was no compensation to landowners

who would be affected. Porirua City Council opposed this submission. The Regional Policy Statement has been prepared to achieve the purpose of the Resource Management Act, which is to promote the sustainable management of natural and physical resources in the region. Section 85(2) of the Act allows any person having an interest in land to challenge any provision or proposed provision of a plan or proposed plan if that provision or proposed provision renders that interest in land incapable of reasonable use. However, the Act does not have any provision for compensation of the loss of landowner rights that could be addressed through the landscape provisions in the Regional Policy Statement.

Kapiti Coast District Council generally supported the objective and policies for landscape. They also stated that there is limited recognition, identification and management for potentially significant or notable landscapes i.e. currently degraded landscapes that could be outstanding. Winstone Aggregates and Masterton District Council opposed this submission. Greater Wellington staff note Kapiti Coast District Council's support and consider that when policies 24 to 27 and 49 are being implemented, they can only apply to the existing landscape, not to what it could be in the future. Landscapes evolve over time whether it is from physical, social, economic or cultural forces. If a degraded landscape was to be enhanced at some later date, sections 6(b) and 7(c) of the Resource Management Act would still be applicable.

Meridian Energy Limited sought that paragraph 5 be amended to replace the word "particularly" with "potentially". Masterton District Council supported this submission. Greater Wellington staff consider that a change to "potential" is not appropriate as it has been identified that these sensitive landscapes are particularly affected. However, an amendment has been made to make the statement clear and concise. It is therefore not recommended to make the amendment as requested.

Porirua City Council generally supported the objective, policies and methods for landscape. They also noted that at present there was no guidance addressing how territorial authorities are meant to give effect to these policies or address cross-boundary issues and suggest that this could be dealt with through method 49. The New Zealand Defence Force opposed this submission, and Kiwi Income Property Trust, Kiwi Income Properties Limited and Kiwi Properties Management Limited supported this submission. Greater Wellington staff consider that this has adequately been dealt with in the proposed Regional Policy Statement. Section 2.5 specifically addresses cross boundary issues, whilst the landscape policies and methods will provide consistency in identifying, protecting and managing the effects on landscape values across the region. Additionally, method 49 will provide a consistent description and categorisation of the region's landscapes that will assist with the consistent identification of outstanding natural features and landscapes and significant amenity landscapes across the region.

Diane and Mike Strugnell generally supported the objective and policies for landscape. However they sought stronger policies to protect landscapes from inappropriate developments such as wind farms. TrustPower Limited, Wellington International Airport Limited and Meridian Energy Limited opposed this submission. Greater Wellington staff note the support and consider that the policy framework for landscape already adequately deals with inappropriate development in a landscape context.

TrustPower Limited sought that paragraph 3 be amended to include renewable energy generation as an activity that shapes our landscapes. They also sought that paragraph 4 be amended to state that aspects of Wellington region’s landscapes are at risk of being lost or degraded by inappropriate activities that do not efficiently use the region’s renewable resources. Federated Farmers of New Zealand supported this submission. Greater Wellington staff accept that renewable energy generation is an activity that shapes our landscapes and consequently it has been added to this introductory statement. However, it is not considered appropriate to reflect that the region’s landscapes are at risk of being lost or degraded through inappropriate activities that do not efficiently use the region’s renewable resources, as there are many activities that can also impact on landscapes.

Tararua Tramping Club, Wellington City Council and Wellington Fish and Game Council all generally supported section 3.7: landscape. This support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/15	Reject
Michael James Curtis	27/3	Reject
Kapiti Coast District Council	56/13	Accept in part
Meridian Energy Limited	82/11	Reject
Porirua City Council	100/5	Accept in part
Diane and Mike Strugnell	113/3	Accept in part
Tararua Tramping Club	114/10	Accept
TrustPower Limited	124/14	Accept in part
Wellington City Council	131/9	Accept
Wellington Fish and Game Council	133/17	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend paragraphs three to five in section 3.7 Landscape as follows:

Within all communities in the region there is an increasing awareness of the distinctive character of local landscapes and natural features, and their importance to our quality of life. Landscapes influence our sense of identity and our experiences of the places we live. Landscape is regarded as a physical resource that shapes and is shaped by many of our activities such as farming, tourism, forestry, renewable energy generation and urban development. For Maori it provides earthly links with ancestors and tribal history, and is intrinsic to the wellbeing of the people of that place. The rohe, or tribal area for tangata whenua, is often associated with landscapes and features and therefore they have powerful cultural significance.

Landscape change is inevitable, even without human action. However, the degree of change caused by human activities has been accelerating. The distinctive aspects of the Wellington region's landscapes are at risk of being lost or degraded.

Urban and rural residential developments are bringing new types and patterns of land use into peri-urban areas, as well as into more rural and remote areas. This can particularly affects more sensitive landscapes – such as on ridgelines and the coast. Modern earth-moving machinery can reshape landform so quickly and drastically that natural patterns of land, drainage and vegetation cover are dramatically altered or destroyed. Even small changes in land use and development patterns can have cumulative impacts on landscapes.

2.47 Section 3.7 Landscape - Issue 1: Inappropriate modification and destruction of outstanding natural features and landscapes, and significant amenity landscapes

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/17	Sought Landscape Issue 1 be amended as follows: Inappropriate subdivision, use and development can adversely affect outstanding natural features and landscapes.
F22/37	Anders Crofoot	Support
F24/40	Masterton District Council	Support
Mighty River Power	83/15	Sought retention of the key resource management issues.

(a) Discussion

Federated Farmers of New Zealand sought that reference to significant amenity landscapes be deleted from the issue, as there is no legal imperative to protect these landscapes. Anders Crofoot and Masterton District Council supported this submission. In terms of significant amenity landscapes, it is considered that the current wording is consistent with the Resource Management Act. Section 7(c) of the Act states that particular regard be given to the maintenance and enhancement of amenity values, in relation to managing the use, development, and protection of natural and physical resources. The modification and destruction of significant amenity landscapes was also identified as a regionally significant issue requiring integrated management during the review of the Regional Policy Statement.

They also sought that the words “modification and destruction” be replaced with “inappropriate subdivision, use and development can adversely affect”, to be consistent with the Act. It is considered that the term “inappropriate modification and destruction” accurately reflects the regionally significant issue for landscape in the Wellington region. Greater Wellington staff therefore recommend that no amendments are made as requested by the submitter.

Mighty River Power supported the regionally significant issue for landscape. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/17	Reject
Mighty River power	83/15	Accept

All further submissions are rejected accordingly.

(c) Recommended changes

There are no recommended changes to issue 1.

2.48 Objective 17

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/18	Sought that objective 17 be amended as follows: The region's outstanding natural features and outstanding landscapes are identified and their values are protected from inappropriate subdivision, use and development

Submitter	Submission	Summary
F1/30	Winstone Aggregates	Support
F19/21	Horticulture New Zealand	Support
F22/38	Anders Crofoot	Support
F24/41	Masterton District Council	Support
Masteron District Council	75/17	Sought that the words "amenity landscape" be deleted from objective 17.
Meridian Energy Limited	82/12	Sought amendments to read: 'The region's outstanding natural features and landscapes are identified and their values are protected from inappropriate subdivision, use and development. Objective17A The region's significant amenity landscapes are identified and their defining characteristics and values are maintained and enhanced.'
F23/35	Federated Farmers of New Zealand	Support
F26/13	Mighty River Power	Support
F24/80	Masterton District Council	Support
Mighty River Power	83/16	Sought retention of objective17 in its entirety.
F16/18	Genesis Energy	Support
New Zealand Historic Places Trust	87/7	Sought retention of objective 17.
Porirua City Council	100/55	Supported objective 17.
Ravensdown Fertiliser Co- operative Limited	104/1	Sought review of objective 17 and associated policies 24-27 to take into account the need to balance the protection of outstanding and significant landscapes with the importance of resource use.

Submitter	Submission	Summary
Ravensdown Fertiliser Co-operative Limited	104/2	Sought further guidance on how the objective and associated policies 24-27, objective 30, and policy 60 are to be balanced in order to provide certainty and reduce subjectivity.
Transpower New Zealand Limited	123/10	Sought: A. The reference in objective 17 to the identification, protection or enhancement of the values of the region's outstanding natural features and landscapes. B. Deletion from objective 17, the reference to 'landscapes and significant amenity landscapes'.
F23/36	Federated Farmers of New Zealand	Support
F24/103	Masterton District Council	Support
Wellington City Council	131/60	Supported objective 17.

(a) Discussion

Federated Farmers of New Zealand and Transpower New Zealand Limited sought that reference to significant amenity landscapes be deleted from objective 17. Anders Crofoot, Winstone Aggregates, Horticulture New Zealand and Masterton District Council supported the submission by Federated Farmers of New Zealand. Federated Farmers of New Zealand and Masterton District Council supported the submission by Transpower New Zealand Limited. Greater Wellington staff consider that significant amenity landscapes need to be addressed as an objective as the modification and destruction of these landscapes have been identified as a regionally significant issue. It is therefore recommended that the reference to significant amenity landscapes be retained. However, due to confusion about the two different types of landscapes, Greater Wellington staff recommend the objective be split into two.

Federated Farmers of New Zealand also sought that the objective be amended to state that the region's outstanding natural features and landscapes are protected from inappropriate subdivision, use and development. Winstone Aggregates, Horticulture New Zealand and Masterton District Council all supported the submission by Federated Farmers of New Zealand. It is considered that the addition of "inappropriate subdivision, use and development" is appropriate where it relates to outstanding natural features and landscapes as this explains what these outstanding values are to be protected from and gives effect to section 6(b) of the Resource Management Act.

Masterton District Council sought that the words “amenity landscape” be deleted from objective 17. Greater Wellington staff consider that significant amenity landscapes need to be addressed as an objective as the modification and destruction of these landscapes have been identified as a regionally significant issue. It is therefore recommended that the reference to significant amenity landscapes be retained. However, due to confusion about the two different types of landscapes, Greater Wellington staff recommend the objective be split into two.

Meridian Energy Limited sought that the objective be separated into its two respective components, being the protection of outstanding natural features and landscapes and the maintenance and enhancement of significant amenity landscapes. Federated Farmers of New Zealand, Mighty River Power and Masterton District Council all supported this submission. Greater Wellington staff consider that it would be appropriate to split the objective to reflect that these matters are described in two different sections of the Resource Management Act. Section 6(b) refers to the “protection of outstanding natural features and landscapes” and Section 7(c) the “maintenance and enhancement of amenity values,” and the separation would ensure that there was a clear distinction between the two. It is therefore recommended to split this objective as requested by the submitter.

Mighty River Power, New Zealand Historic Places Trust and Porirua City Council sought retention of the objective. Genesis Energy supported the submission by Mighty River Power. The support is noted. Changes have however been made to the objective in response to other submissions.

Ravensdown Fertiliser Co-operative Limited sought that the objective and policies take into account the need to balance the protection of outstanding and significant landscapes with the importance of resource use. They also seek further guidance on how the landscape objective and policies are balanced with objective 30 and policy 60 to give certainty and reduce subjectivity. Greater Wellington staff consider that it is not appropriate to include such provisions within the landscape objective and policy framework. It is important to note that the objectives and policies within this document are meant to be read in conjunction with one another and not in separation. Objective 30 and its associated policy 60 in relation to utilising the region’s mineral resources needs to be balanced with the landscape provisions when giving effect or consideration to the Regional Policy Statement.

Transpower New Zealand Limited sought clarification around the word landscape, as they believe that it could be interpreted that landscapes in general were being encapsulated within the objective and policy framework. Federated Farmers of New Zealand and Masterton District Council supported this submission. Greater Wellington staff would like to point out that the reference to landscape

in this objective is in regard to outstanding natural landscapes and not landscapes in general and this could be made clearer by inserting “and” after “natural feature”. It is therefore recommended to amend the wording in the objective as requested by the submitter.

Wellington City Council supported objective 17. Their support is noted. Changes have however been made to the objective in response to other submissions.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/18	Accept in part
Masterton District Council	75/17	Reject
Meridian Energy Limited	82/12	Accept
Mighty River Power	83/16	Accept
New Zealand Historic Places Trust	87/7	Accept
Porirua City Council	100/55	Accept
Ravensdown Fertiliser Co-operative Limited	104/1	Reject
Ravensdown Fertiliser Co-operative Limited	104/2	Reject
Transpower New Zealand Limited	123/10	Accept
Wellington City Council	131/60	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend objective 17 as follows:

Objective 17

The region’s outstanding natural features, and landscapes ~~and significant amenity landscapes~~, are identified and their values protected, ~~maintained or enhanced~~ from inappropriate subdivision, use and development.

And include an additional objective as follows:

Objective #

The region's significant amenity landscapes are identified and their values are maintained and enhanced.

2.49 Section 3.8 Natural hazards

Submitter	Submission	Summary
Winstone Aggregates	15/16	Sought that the Council either reinstate issue 8, policies 4 and 5 and the methods (refer to pages 94, and 100-101, 107-109) from the operative Regional Policy Statement together with appropriate amendments to objective 19; or amend the Regional Policy Statement, in particular section 3.8 issues and objectives 18-20 and policies 50 and 51 to reflect the operative provisions. Sought additional amendments where necessary to the methods to reflect the policy changes sought.
Coastland Shopping Limited	24/2	Sought retention, in principle, of the relevant objectives, policies and methods on natural hazards. Sought that wide consultation be encouraged when developing plan changes on natural hazards.
F20/21	Westfield New Zealand Ltd	Support
Michael James Curtis	27/4	Opposed section. Stated that the Regional Policy Statement did not consider landowner rights and that there was no compensation to landowners who are affected.
East Harbour Environmental Association Incorporated	33/6	Supported improvements made from draft Regional Policy Statement.
Masterton District Council	75/21	Sought that full consultation be carried out with Masterton District Council when considering any change to the allocation of responsibilities for land use to control natural hazards.
Wairarapa Regional Irrigation Trust	127/3	Page 52 The recognition that climate change will result in a drier Eastern part of the region and a wetter Western part including the Tararua range was supported. Sought some comment on the water management issues/opportunities coming out of this in terms of water harvesting and flow augmentation. Stated that this should reflect the benefits to the region from allowing for the best, most efficient use of water to be made at the times of greatest need by harvesting

Submitter	Submission	Summary
		and storing in times of surplus.
Wellington City Council	131/10	Support for the objectives, policies and methods relating to this topic.
Wellington Fish and Game Council	133/18	Supported the issues, policies and methods relating to natural hazards and sought that they be retained.

(a) Discussion

Winstone Aggregates sought that issue 8 and policies 4 & 5 in the operative Regional Policy Statement be retained or that policies and objectives in the proposed Regional Policy Statement be amended to specifically include reference to gravel extraction activities in river beds.

Staff note there are currently a number of operative floodplain management plans that specify gravel extraction measures to reduce flood hazard, and this issue is best dealt with at an operational level and in the regional plans (currently at the start of the review stage). The suggested policy inclusions are more single issue focussed and are best placed in the regional plans to support specific rules regarding the extraction of gravel from river beds. Policy 51 supports soft-engineering activities, such as gravel extraction from river beds that also has the effect of mitigating flood hazard. The aim of policies 50 and 51 and objective 18-20 is to keep them applicable to all hazards, rather than being single issue focussed. The issue of gravel extraction was not identified in isolation as a regionally significant issue. It is therefore recommended that the operative provisions identified by Winstone Aggregates not be included in the proposed Regional Policy Statement.

Coastland Shopping Limited supported the principles of the relevant objectives, policies and methods but note that wide consultation be encouraged when developing plan changes on natural hazards. This submission point was supported by Westfield New Zealand Limited. Officers note the Resource Management Act requires city and district councils to consult all affected parties during the development of district plans.

Michael James Curtis rejected all hazard objectives, policies and methods on the basis that it will stop buildings in hazard areas. Officers note the objectives, policies and methods are all aimed at ensuring that use, development and subdivision take natural hazards into consideration, and that in places where the risk is considered high or extreme, development and subdivision is best avoided. Thus, the policies do not seek a blanket avoidance of all development in hazard areas, rather only those areas where the hazard and risk is considered high.

The **Wairarapa Regional Irrigation Trust** sought comment on water management issues and opportunities arising out of climate change, particularly in terms of water harvesting and flow augmentation. Greater Wellington staff note that pressure on water resources as a result of climate change is also raised in the introductory material in section 3.4 on fresh water. The introductory material in both sections 3.4 and 3.8 provide background information on natural resources before presenting the issues of the proposed Regional Policy Statement. Policy responses are not included in the introductory material. An objective relating to efficient use of water is included in section 3.4 and policies on efficient use of water, including water harvesting, are in sections 4.1 (policy 18) and 4.2 (policies 43 and 44). River flow augmentation can provide opportunities for water use to be more efficient and it should be promoted in the proposed Regional Policy Statement. Accordingly, it is recommended that policy 18 and its explanation are amended to promote augmentation of river flows. Readers are referred to policy 18 to view the recommended changes.

East Harbour Environmental Association Incorporated supported the improvements made since the draft Regional Policy Statement. The support is noted.

Masterton District Council sought that full consultation be carried out with Masterton District Council when considering any change to the allocation of responsibilities for land use to control natural hazards. Greater Wellington staff consulted widely with Territorial Authorities, including Masterton District Council, in the development of the hazards provisions for Regional Policy Statement which included consultation on the allocation of responsibilities for the management of natural hazards. The outcome of this consultation is contained in policy 62 – “Allocation of responsibilities for land use controls for natural hazards”. This outlines the roles of local authorities for developing objectives, policies and rules for the regional, district and city plans and in the control of land for the avoidance or mitigation of natural hazards. Any future changes to these roles and responsibilities would involve full consultation with all affected parties.

Wellington City Council supported the objectives, policies and methods of section 3.8. The support is noted.

Wellington Fish and Game Council supported the issues, objectives, policies and methods and sought they be retained. Staff note the support. See the report on policies 28 and 50 for recommended changes.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/16	Reject
Coastland Shopping Limited	24/2	Accept
Michael James Curtis	27/4	Reject
East Harbour Environmental Association Incorporated	33/6	Accept
Masterton District Council	75/21	Accept
Wairarapa Regional Irrigation Trust	127/3	Accept in part
Wellington City Council	131/10	Accept
Wellington Fish and Game Council	133/18	Accept in part

The further submissions Westfield New Zealand Ltd is accepted accordingly.

(c) Recommended changes

There are no recommended changes to section 3.8 Natural Hazards.

2.50 Section 3.8 Natural hazards - Issue 3: Climate change will increase both the magnitude and frequency of natural hazard events

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/19	Sought that Natural Hazards issue 3 be amended as follows: Climate change has the potential to increase both the magnitude and frequency of natural hazard events Or, sought deletion of the issue and for clauses (a), (b) and (c) to be moved to issue 1.
F22/39	Anders Crofoot	Support
F24/41	Masterton District Council	Support

(a) Discussion

Federated Farmers of New Zealand sought that issue 3 in section 3.8 be amended to note that climate change only presents a potential

to increase hazard events or the deletion of the issue. This submission point was supported by Anders Crofoot and Masterton District Council. Greater Wellington staff note that climate change is a fully established and recognised occurrence. There may be debates about the finer details, but there is no question that climate change is already occurring. Climate change will exacerbate natural hazard events and staff consider it important that the proposed Regional Policy Statement acknowledges these effects.

Sea level rise is a measured and documented occurrence, directly linked to climate change. It is rising due to two main factors; thermal expansion of the oceans and accelerated ice melt. Both these processes are being caused by increasing global mean temperatures. Sea levels have been measured via tide gauges around New Zealand since the 1890's. The data reveals that sea level has been rising at an average rate of 1.8 mm/yr for over 100 years. This is in line with internationally measured rates. Moreover, measurements from satellite altimetry for the past 20 years show that this rate has accelerated and is currently closer to 3.1 mm/yr. Thus, sea level rise is already having an impact on the region. The natural hazard effects of sea level rise on coastlines is well established in the scientific literature and includes coastal erosion and inundation, exacerbation of storm surge, saltwater intrusion, increased river flooding and restricted drainage.

Climate science is sufficiently established to enable forecasts of increasing storm intensity or frequency from increasing air, surface and ocean temperatures. Measurements reveal unequivocally that mean global temperature has been rising for over 100 years. The cause and effect linkages between increased rainfall and flooding, landslides, extreme winds, storm surge and coastal erosion are well documented and understood; all being hazards associated with storm events.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/19	Reject

All further submissions are rejected accordingly.

(c) Recommended changes

There are no recommended changes to issue 3.

2.51 Objective 18

Submitter	Submission	Summary
Kapiti Coast District Council	56/14	Generally supported the intention of objective 18 regarding avoiding or minimising natural hazard risk.
Oil Companies	92/4	Sought retention of the focus on risk (as opposed to activities) in objective 18.
Transpower New Zealand Limited	123/11	Sought retention of the focus on risk (as opposed to activities) in objective 18
F5/13	PowerCo Limited	Support
Upper Hutt City Council	125/2	Supported the intent of objectives 18.
Wellington City Council	131/61	Supported objective 18

(a) Discussion

Kapiti Coast District Council, Oil Companies and Transpower New Zealand Limited supported the intent of this objective and sought retention of focus on risk. This submission point was supported by PowerCo Limited. Staff note that the aim of the objective is to provide safe environments for people to live and conduct their businesses, whilst also being flexible, recognising that risk is a function of the degree of hazard and the vulnerability and resilience of the community. Hence, staff agree that the objective should focus on the risk, rather than purely the hazard and is why it has been worded accordingly.

Upper Hutt City Council and Wellington City Council supported objective 18. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Kapiti Coast District Council	56/14	Accept
Oil Companies	92/4	Accept
Transpower New Zealand Limited	123/11	Accept
Upper Hutt City Council	125/2	Accept

Submitter	Submission	Recommendation
Wellington City Council	131/62	Accept

The further submission from PowerCo Limited is accepted accordingly.

(c) Recommended changes

There are no recommended changes to objective 18.

2.52 Objective 19

Submitter	Submission	Summary
Oil Companies	92/5	Sought retention of the focus on risk (as opposed to activities) in objective 19.
Transpower NZ Limited	123/12	Sought retention of the focus on risk (as opposed to activities) in objective 19.
F5/14	PowerCo Limited	Support
Upper Hutt City Council	125/3	Supported the intent of objective 19
Wellington City Council	131/62	Supported objective 19

(a) Discussion

Oil Companies and **Transpower New Zealand Limited** supported the intent of this objective and sought retention of focus on risk. This submission point was supported by PowerCo Limited. The aim of the objective is to minimise the adverse impacts of hazard mitigation measures on the environment. It recognises that risk is a function of not only of the hazard but also the vulnerability of the development or community. Hence, staff agree that the objective should focus on the risk, rather than purely the hazard and is why it has been worded accordingly.

Upper Hutt City Council and **Wellington City Council** supported objective 19. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Oil Companies	92/5	Accept
Transpower New Zealand	123/12	Accept

Submitter	Submission	Recommendation
Limited		
Upper Hutt City Council	125/3	Accept
Wellington City Council	131/62	Accept

The further submission from PowerCo Limited is accepted accordingly.

(c) Recommended changes

There are no recommended changes to objective 19.

2.53 Objective 20

Submitter	Submission	Summary
East Harbour Environmental Association Incorporated	33/7	Supported improvements made from draft Regional Policy Statement.
Upper Hutt City Council	125/4	Supported the intent of objective 20
Wellington City Council	131/63	Supported objective 20.

(a) Discussion

East Harbour Environmental Association Incorporated supported the improvements made since the draft Regional Policy Statement. The support is noted.

Upper Hutt City Council and **Wellington City Council** supported objective 20. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
East Harbour Environmental Association Incorporated	33/7	Accept
Upper Hutt City Council	125/4	Accept
Wellington City Council	131/63	Accept

(c) Recommended changes

There are no recommended changes to objective 20.

2.54 Section 3.9 Regional form, design and function

Submitter	Submission	Summary
Kapiti Coast District Council	56/15	Supported objective 21 and the inclusion of policies 29, 30, 31, 32, 53, 54, 55, 56, 57, 58 and 67. Stated that this integrated approach to land use and transportation is appreciated.
F20/26	Westfield New Zealand Ltd	Support
Kirkcaldie and Stains Ltd	61/1	Supported Section 3.9 in particular, which they stated they understood related to the need to ensure that the existing centres of the Wellington region are supported and intensified where possible. However, requested that the Wellington Central Business District, which is included in the definition of Regionally Significant Centres, is clearly identified as being at the top of the hierarchy.
Mighty River Power	83/17	Sought that the explanation and objective 21 be amended to include recognition that reverse sensitivity effects need to be considered as part of the achievement of good regional form.
F1/70	Winstone Aggregates	Support
F13/24	Wellington International Airport Limited	Support
NZ Transport Agency	91/5	Supported issues - subject to changes requested to issue 3.
F20/34	Westfield New Zealand Ltd	Support
Porirua City Council	100/7	Supported the inclusion of regional form, design and function as a matter of regional significance. Stated that the inclusion of this issue is consistent with the Wellington Regional Strategy and its focus area three: investment in good regional form. However, sought that reference to Petone, Kilbirnie and Johnsonville be removed from the introduction where it discussed regionally significant centres or amended to distinguish between the sub-regional civic and commercial centres and the suburban centres of Petone, Kilbirnie and Johnsonville.

Submitter	Submission	Summary
F12/6	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
F20/35	Westfield New Zealand Ltd	Support
South Wairarapa District Council	112/16	Stated concern that there was no mention of the smaller towns, their contribution to the region, requirements for public transport or good urban design albeit in a smaller way.
F19/22	Horticulture New Zealand	Support
Transpower New Zealand Limited	123/13	Sought objective 21 be amended to recognise that regional form may be affected by existing infrastructure. This could be achieved by making amendments to the following effect: "A compact, well designed and sustainable regional form that has an integrated, safe and responsive transport network and: (j) efficient of use and development of existing infrastructure"
F5/15	PowerCo Limited	Support
F13/25	Wellington International Airport Limited	Support
Wellington City Council	131/11	Supported for the objectives, policies and methods relating to this topic
Wellington Fish and Game Council	133/19	Supported the issues, policies and methods relating to regional form, design and function and sought that they be retained.
Wellington International Airport Limited	134/4	Supported objectives and policies on efficient use of existing infrastructure, improvements to east west linkages and integration of landuse and transportation strategies as stated that being geographically constrained, sustainable management of Wellington's

Submitter	Submission	Summary
		existing infrastructure was a key consideration.
F11/11	Paraparaumu Airport Limited	Support
Westfield New Zealand Ltd	138/4	Supported section 39 but sought on page 57 a further sentence added to the introductory paragraph as follows (or words to like effect): "Encouraging use and development of existing centres of business activity can also lead to social and economic benefits."
F12/57	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
Westfield New Zealand Ltd	138/5	Supported section 39 but sought on page 57 further wording be added to the second paragraph as follows (or words to like effect): "They also have the potential to support new development and increase the range and diversity of activities, where such development does not affect the viability and vibrancy of other centres in the Region."
F12/58	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support

(a) Discussion

Kapiti Coast District Council, Wellington City Council, Porirua City Council, Wellington Fish and Game Council and Wellington International Airport Limited supported section 3.9 'Regional form, design and function'. Westfield New Zealand Ltd supported the submissions from Kapiti Coast District Council and Porirua City Council. Kiwi Income Property Trust, Kiwi Income Properties Ltd and Kiwi Properties Management Ltd also supported the submission by Porirua City Council. Paraparaumu Airport Limited supported the

submission by Wellington International Airport Limited. The support from these submissions for section 3.9 is noted.

Porirua City Council however, also sought that reference to Petone, Kilbirnie and Johnsonville be removed from the introduction where it referred to regionally significant centres, or amended so that the introduction distinguished between the sub-regional civic commercial centres and the suburban centres of Petone, Kilbirnie and Johnsonville. It is recommended that the introduction be amended to distinguish between the centres as requested by the submitter. For more information on this change please refer to the discussion under policy 29.

The **NZ Transport Agency** supported all the issues, subject to the changes sought to issue 3. Their submission was supported by Westfield New Zealand Ltd. The changes sought by the NZ Transport Agency are recommended to be accepted (see recommended changes to issue 3). It is therefore recommended that the submissions be accepted.

Kirkcaldie and Stains Ltd supported the section, however requested that the Wellington Central Business District be clearly identified as being at the top of the centres hierarchy. The first sentence, in paragraph two on page 57, states that central Wellington City contains the central business district for the region. It is therefore not necessary to amend section 3.9.

Mighty River Power sought that the explanation and the objective be amended to note that reverse sensitivity effects needed to be considered as part of good regional form. Winstone Aggregates and Wellington International Airport supported the submission. It is not necessary to amend the introduction to section 3.9, or objective 27, as these matters are more specifically addressed in section 3.3. It is however considered appropriate to list this as an effect under issue 2. In addition, the cross referencing next to issue 2 should be amended to include reference to objective 10 (in section 3.3). See recommended changes under issue 2 below.

Transpower New Zealand Limited sought amendments to objective 21 to recognise that regional form may be affected by existing infrastructure. This submission was supported by PowerCo Limited and Wellington International Airport Limited. Objective 21 is about the outcome sought for the region with regard to the region's form. Clause (j) states that this is efficient use of existing infrastructure. In terms of the issue that regional form may be affected by existing infrastructure this is recognised in clause (a) and (h) in issue 2. No changes are therefore recommended to objective 21 as this is proposed to respond to the issue 1, 2 and 3 on regional form, design and function.

South Wairarapa District Council stated concern that there was no mention of smaller towns and their contribution to the region. The submission was supported by Horticulture New Zealand. It is recommended that an additional sentence be added to paragraph two to note the importance of smaller centres as part of the region’s form.

Westfield New Zealand Ltd sought two additional sentences to the introductory text in section 3.9. These changes were supported by Kiwi Income Property Trust, Kiwi Income Properties Ltd and Kiwi Properties Management Ltd. The first addition about social and economic benefits helps to set context around the issues and should be accepted. The second sentence is however, in the most part, already covered in paragraph two. The addition of the words “where such development does not affect the viability and vibrancy of other centres in the region” is not considered appropriate for inclusion in the introduction. This statement is not fully consistent with the policies in response with the issues contained in the proposed Regional Policy Statement.

(b) Recommended decision

Submitter	Submission	Recommendation
Kapiti Coast District Council	56/15	Accept
Kirkcaldie and Stains Ltd	61/1	Accept in part
Mighty River Power	83/17	Accept in part
NZ Transport Agency	91/5	Accept
Porirua City Council	100/7	Accept in part
South Wairarapa District Council	112/16	Accept
Transpower New Zealand Limited	123/13	Reject
Wellington City Council	131/11	Accept
Wellington Fish and Game Council	133/19	Accept
Wellington International Airport Limited	134/4	Accept
Westfield New Zealand Ltd	138/4	Accept
Westfield New Zealand Ltd	138/5	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend paragraph two in section 3.9 as follows:

Central Wellington city contains the central business district for the region. Its continued viability, vibrancy and accessibility are important to the whole region. There are also a number of other regionally significant centres that are an important part of the region's form. These are the sub-regional city centres of Upper Hutt city centre, Lower Hutt city centre, Porirua city centre, Masterton town centre, Paraparaumu town centre, and the suburban centres in Petone, Johnsonville and Kilbirnie. These centres are significant areas of transport movement and civic and community investment. They also have the potential to support new development and increase the range and diversity of activities. Good quality medium density housing in these centres could increase housing choice and the use of services and public transport. Encouraging use and development of existing centres of business activity can also lead to social and economic benefits. Additional local employment around these centres could also provide people with greater choice about where they work. The physical arrangement of urban and rural communities/smaller centres, These centres, along with the region's industrial business areas, the port, the airport, the road and public transport network, and the region's open space network are fundamental to a compact and well designed regional form.

2.55 Section 3.9 Regional form - Issue 1: Poor quality urban design

Submitter	Submission	Summary
Kiwi Property Holdings Ltd	62/2	Sought clarification of the issues so that there are clear linkages between the issue and the objectives, policies and methods
Westfield New Zealand Ltd	138/18	Supported issue 1

(a) Discussion

Kiwi Property Holdings Ltd sought that there be clearer linkages between the issues, objectives, policies and methods. They however requested no specific changes to issue 1. They requested changes to issue 2 and issue 3 which are recommended to be accepted.

Westfield New Zealand Ltd supported issue 1. The submitters support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Kiwi Property Holdings Ltd	62/2	Accept
Westfield New Zealand Ltd	138/18	Accept

(c) Recommended changes

There are no recommended changes to issue 1.

2.56 Section 3.9 Regional form - Issue 2: Sporadic and uncoordinated development

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/20	Sought deletion of element (c) from Issue 2
F22/40	Anders Crofoot	Support
Kiwi Property Holdings Ltd	62/4	The following changes were sought to Issue 2: 2.Sporadic, uncontrolled and/or uncoordinated development Uncoordinated and sporadic development (including of infrastructure) can adversely affect the region's compact form. This can, among other things, result in: (a) new development that is poorly located in relation to existing infrastructure (such as roads, sewage and stormwater systems) and is costly or otherwise difficult to service (b) development in locations that restrict access to the significant physical resource in the region – such as aggregate (c) the loss of rural or open space land valued for its productive, ecological, aesthetic and recreational qualities (d) insufficient population densities to support public transport and other public services (e) new infrastructure that can encourage development in locations that undermine existing centres and industrial employment areas (f) loss of vitality and/or viability in the regional central business district of Wellington City and the other regionally significant centres; and (g) displacement of industrial employment activities from established industrial areas.

Submitter	Submission	Summary
F20/27	Westfield New Zealand Ltd	Support part 2(g) and (f)
Westfield New Zealand Ltd	138/6	Supported issue 2 but stated that the issue 'sporadic and uncoordinated development', should be amended to read (or words to like effect): “(e) development in locations that undermine existing centres and employment areas.”
F12/59	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support

(a) Discussion

Federated Farmers of New Zealand sought the deletion of clause (c) from issue 2. The submitter stated that section 5(2)(b) of the Act provides that a resource (land and soil) must be maintained to sustain life supporting capacity of soil. They stated that this involves avoiding, remedying and mitigating adverse effects, not protecting the resource for particular activities. The submission of Federated Farmers of New Zealand was supported by Anders Crofoot. It is noted that clause (c) is a bullet point in a list of adverse effects from 'uncoordinated and sporadic development'. The effect is described as the 'loss of rural or open space land with particular values'. The issue is therefore not about protecting land for activities but about effects. No changes are therefore required.

Kiwi Property Holdings Ltd sought two new clauses (f) and (g) in issue 2 to ensure consistency with the objective and policies. They also sought that the title be changed to (additions shown underlined) “Sporadic, uncontrolled and/or uncoordinated development”. This submission was supported by Westfield New Zealand Ltd, to the extent to which it was consistent with their submission. It is appropriate that these changes be accepted as they help to provide linkages between the issue, objective and policies and clarify the issue.

Westfield New Zealand Ltd sought changes to improve clause (e). The proposed change was supported by Kiwi Income Property Trust, Kiwi Income Properties Ltd and Kiwi Properties Management Ltd. It

is recommended that the proposed deletion be made, as the first few words were unnecessary.

(b) Recommended decision

Submitter	Submission	Submitter
Federated Farmers of New Zealand	35/20	Reject
Kiwi Property Holdings Ltd	62/4	Accept
Westfield New Zealand Ltd	138/6	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend issue 2, in response to submissions above and add a new clause (h) in response to the submission by Mighty River Power in section 3.9, as follows:

2. Sporadic, uncontrolled and/or uncoordinated development

Uncoordinated, ~~and~~ sporadic, and/or uncontrolled development (including of infrastructure) can adversely affect the region's compact form. This can, among other things, result in:

- (a) new development that is poorly located in relation to existing infrastructure (such as roads, sewage and stormwater systems) and is costly or otherwise difficult to service
- (b) development in locations that restrict access to the significant physical resource in the region – such as aggregate
- (c) the loss of rural or open space land valued for its productive, ecological, aesthetic and recreational qualities
- (d) insufficient population densities to support public transport and other public services
- (e) ~~new infrastructure that can encourage~~ development in locations that undermine existing centres and industrial employment areas
- (f) loss of vitality and/or viability in the region's central business district and other centres of regional significance
- (g) displacement of industrial employment activities from established industrial areas

- (h) adverse effects on the management, use and operation of infrastructure from incompatible land uses under, over, on or alongside.

2.57 Section 3.9 Regional form - Issue 3: Integration of land use and transportation

Submitter	Submission	Summary
NZ Transport Agency	91/6	Sought amendment of issue 3 to read '(c) reduced opportunities for alternate means of travel (such as walking and cycling), increased community severance, and increased costs associated with upgrading roads (d) ...compromising the efficient and safe operation...'
Kiwi Property Holdings Ltd	62/3	Sought the following changes to issue 3: 3. Integration of land use and transportation 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, resulting in: (a) increased emissions to air from a variety of pollutants, including greenhouse gases (b) increased use of energy and reliance on non-renewable resources (c) reduced opportunities for alternate means of travel (such as walking and cycling) and increased costs associated with upgrading roads (d) increased road congestion leading to restricted movement of goods and services to, from and within the region, and compromising the efficient operation of the transport network. (e) inefficient use of existing infrastructure (including transport orientated infrastructure)
F20/28	Westfield New Zealand Ltd	Support part 3(e)
Westfield New Zealand Ltd	138/19	Supported issue 3

(a) Discussion

The **NZ Transport Agency** sought changes to the clauses (c) and (d) in issue 3. **Kiwi Property Holdings Limited** sought the addition of a new clause (e) for consistency with the issue and the objective and policies. This additional clause was supported by Westfield New

Zealand Ltd. These changes are appropriate and help to clarify the issue and should be accepted.

Westfield New Zealand Ltd supported issue 3. The submitters support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
NZ Transport Agency	91/6	Accept
Kiwi Property Holdings Ltd	62/3	Accept
Westfield New Zealand Ltd	138/19	Accept

The further submissions from Westfield New Zealand Ltd is accepted accordingly.

(c) Recommended changes

Amend issue 3 as follows:

3. Integration of land use and transportation

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, resulting in:

- (a) increased emissions to air from a variety of pollutants, including greenhouse gases
- (b) increased use of energy and reliance on non-renewable resources
- (c) reduced opportunities for alternate means of travel (such as walking and cycling) ~~and increased costs associated with upgrading roads~~ increased community severance, and increased costs associated with upgrading roads
- (d) increased road congestion leading to restricted movement of goods and services to, from and within the region, and compromising the efficient and safe operation of the transport network
- (e) inefficient use of existing infrastructure (including transport orientated infrastructure)

2.58 Objective 21

Submitter	Submission	Summary
Winstone Aggregates	15/17	Sought a new clause (k) in objective 21 as follows: (k) does not compromise access to significant regional resources (including minerals) and these resources can be accessed in close proximity to the areas they are needed most (e.g. urban areas).
Coastlands Shopping Limited	24/16	Sought retention of objective 21.
F20/5	Westfield New Zealand Limited	Support
Department of Corrections	32/3	Sought that objective 21 be retained in part but amended to include: (k) provides for social infrastructure and essential social services
East Harbour Environmental Association Incorporated	33/8	Stated that promoting high density development should not be at the expense of sacrificing green spaces and gardens for asphalt.
Genesis Energy	40/3	Sought an amendment by adding an additional clause to read '(k) strategically planned corridors for the transportation of over dimensions loads.'
Kiwi Property Holdings Ltd	62/5	Sought that the vibrancy and vitality in all of the regionally significant centres be reinforced. The following changes were sought: objective 21 A compact, well designed and sustainable urban form that has an integrated, safe and responsive transport network and: (a) a viable and vibrant regional central business district in Wellington city; (b) an increased range and diversity of activities in and around the regionally significant centres to maintain vibrancy and vitality; (c) sufficient industrial-based employment locations or capacity to meet the region's needs; (d) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form; (e) strategically planned rural development; (f) a range of housing (including affordable housing); (g) integrated public open spaces;

Submitter	Submission	Summary
		(h) integrated land use and transportation; (i) improved east-west transport linkages; and (j) efficient use of existing infrastructure (including transport network infrastructure).
F20/29	Westfield New Zealand Ltd	Support
New Zealand Historic Places Trust	87/8	Sought retention of objective 21.
Porirua City Council	100/59	Sought that objective 21(b) be amended by removing reference to Petone, Kilbirnie and Johnsonville. Or, alternatively sought that objective 21(b) be amended to clearly distinguish between sub-regional civic and commercial centres and the suburban centres of Petone, Kilbirnie and Johnsonville.
Ravensdown Fertiliser Co-operative Limited	104/3	Sought review of objective 21 (e) and associated policy 55 and method 4 to give direction on how this will affect existing and future rural developments.
F1/84	Winstone Aggregates	Support and oppose
Transpower New Zealand Limited	123/14	Sought objective 21 be amended to recognise that regional form may be affected by existing infrastructure. Stated that this could be achieved by making amendments to the following effect: "A compact, well designed and sustainable regional form that has an integrated, safe and responsive transport network and: (j) efficient of use and development of existing infrastructure".
F26/44	Mighty River Power	Support
Wellington City Council	131/27	Supported objective 21
Wellington Police	135/2	Sought an amendment to include new paragraph (k) provides for social infrastructure and essential social services, including emergency services
Westfield New Zealand Ltd	138/7	Sought that objective 21 be amended as follows (or words to like effect): A compact, well designed and sustainable regional form that has: (aa) an integrated, safe and responsive transport network;

Submitter	Submission	Summary
		(a) a viable and vibrant regional central business district in Wellington city; (b) regionally significant centres which are viable and are supported by an increased range and diversity of activities in and around the centres;
F12/60	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support in part

(a) Discussion

Winstone Aggregates sought the addition of a new clause in objective 21 about ‘not compromising access to significant regional resources (including minerals)’. The additional matters sought for inclusion are addressed in objectives 10 (for regionally significant infrastructure) and objective 30 (for mineral resources). Objective 10 states ‘The social, economic, cultural and environmental benefits of regionally significant infrastructure are recognised and protected’. Objective 30 states ‘The demand for mineral resources is met from local sources as much as possible’. These objectives are to be considered alongside objective 21 and the proposed clause is therefore unnecessary.

Department of Corrections and **Wellington Police** sought the addition of a new clause to state ‘provides for social infrastructure and essential social services’. It is recommended that a new clause be added which states ‘essential social services to meet the region’s needs’. It is noted that use of existing infrastructure is already covered by clause (j) and by objective 10 (for regionally significant infrastructure).

East Harbour Environmental Association Incorporated noted that promoting higher density development should not be at the expense of sacrificing green spaces and gardens. There is no need to change objective 21 in response to this submission. There are a number of policies, specifically policy 53 and Appendix 2, which seek to ensure that any high density development is undertaken with particular regard to the region’s urban design principles.

Genesis Energy sought that a new clause be added ‘(k) strategically planned corridors for the transportation of over dimensions loads.’

Planning for corridors to transport ‘over dimensions loads’ is an issue that is more appropriately addressed when developments (with these needs) arise. At a regional level is not possible to anticipate where and when such needs would be required and therefore provide, or direct, that these needs be provided for.

Kiwi Property Holdings Limited sought changes to clause (d) to clarify that the increased range and diversity of activities, in and around regionally significant centres, was to maintain their vibrancy and vitality. The proposed change was supported by Westfield New Zealand Ltd. This change is appropriate and should be accepted. The submitter also sought the inclusion of the term “urban form” instead of “regional form” at the start of the objective. It is not considered appropriate to amend the objective to only relate it to “urban form” as there are a number elements to the objective and through in the policies to achieve the objective that relate to both urban and rural issues and the region’s form as a whole.

New Zealand Historic Places Trust and **Coastlands Shopping Limited** sought that objective 21 be retained. Westfield New Zealand Ltd supported the submission by Coastlands Shopping Limited. **Wellington City Council** supported the objective. The submissions are noted, the objective has however been modified in response to other submissions.

Porirua City Council sought that objective 21(b) be amended by removing reference to Petone, Kilbirnie and Johnsonville. Or, alternatively sought that objective 21(b) be amended to clearly distinguish between sub-regional civic and commercial centres and the suburban centres of Petone, Kilbirnie and Johnsonville. As noted under policy 29, it is recommended that the full list of centres be retained in the Regional Policy Statement as these centres were identified as centres of significance for the region’s form because of their economic development, transport movement, civic or community investment. However, Porirua City Council’s concern about the centres having different functions is valid. Policy 29 has been recommended to be amended accordingly. It is therefore recommended in objective 21 that clause (b) still refer to regionally significant centres but that the footnote be amended to note which centres are sub-regional centres and those that are suburban centres.

Ravensdown Fertiliser Co-operative Limited sought review of objective 21 (e) and associated policy 55 and method 4, to give direction on how they effect existing and future rural developments. Winstone Aggregates further submitted expressing a concern that the proposed amendments by Ravensdown Fertiliser Co-operative Limited were uncertain and they could not determine how they might be affected by the proposed changes. It is recommended that the submission be rejected. Clause (e) outlines that the objective for the region is to ensure that rural development is strategically planned. Policy 55 outlines matters to be considered when making resource

management decisions about rural development. Policy 55 is to be given particular regard when assessing resource consents, plans changes or designations (in accordance with method 4). Policy 55 will not affect existing rural activities. The matters in the policy will however need to be given particular regard, on a case by case basis, for future rural development.

Transpower New Zealand Limited sought that clause (j) be amended to recognise that regional form may be affected by existing infrastructure and that the word “development” be included in clause (j). Mighty River Power supported the submission. The objective is about the outcome sought to be achieved for the regions form in relation to ‘existing infrastructure’. The inclusion of word “development” would not make sense alongside ‘existing infrastructure’ and it is therefore recommended that it not be included. It is noted that objective 10 and the policies to achieve the objective (outlined in section 3.3 of the proposed Regional Policy Statement) specifically address the development of infrastructure.

Westfield New Zealand Ltd sought that the reference to ‘an integrated, safe and responsive transport network’ at the top of objective 21 be made the first bullet point. Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd supported the submission in part. It is recommended that the change not be made as it is considered important that anyone reading the objective knows that the outcome being sought is a compact well designed regional form with an integrated, safe and responsive transport network system that contains the listed features.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/17	Reject
Department of Corrections	32/3	Accept in part
East Harbour Environmental Association Incorporated	33/8	Accept
Genesis Energy	40/3	Reject
Kiwi Property Holdings Ltd	62/5	Accept in part
New Zealand Historic Places Trust	87/8	Accept
Porirua City Council	100/59	Accept in part
Ravensdown Fertiliser Co-operative Limited	104/3	Reject
Transpower New Zealand Limited	123/14	Accept

Submitter	Submission	Recommendation
Wellington City Council	131/27	Accept
Wellington Police	135/2	Accept in part
Westfield New Zealand Ltd	138/7	Reject

All further submissions are accepted or rejected accordingly.

(c) **Recommended changes**

Amend objective 21 in response to submissions above, add a new clause (d) about the Regional Focus Areas as a consequence of submissions on policy 58 and a footnote to new clause (d) as follows:

Objective 21

A compact, well designed and sustainable regional form that has an integrated, safe and responsive transport network and:

- (a) a viable and vibrant regional central business district in Wellington city;
- (b) an increased range and diversity of activities in and around the regionally significant centres to maintain vibrancy and vitality;
- (c) sufficient industrial-based employment locations or capacity to meet the region's needs;
- (d) development and/or management of the Regional Focus Areas identified in the Wellington Regional Strategy;
- (e) urban development in existing urban areas, or when beyond urban areas, development that reinforces the region's existing urban form;
- (f) strategically planned rural development;
- (g) a range of housing (including affordable housing);
- (h) integrated public open spaces;
- (i) integrated land use and transportation;
- (j) improved east-west transport linkages; ~~and~~
- (k) efficient use of existing infrastructure (including transport network infrastructure); and
- (l) essential social services to meet the region's needs.

Amend the footnote to clause (b)

Includes the sub-regional centres of Upper Hutt city centre, Lower Hutt city centre, Porirua city centre, Paraparaumu town centre, Masterton town centre and the suburban centres in Petone; Kilbirnie; and Johnsonville.

Add a new footnote to clause (d):

The Regional Focus Areas are described on pages 36 to 39 in the Wellington Regional Strategy. They are areas of critical importance to the achievement of the region's compact form and are predicted to either come under significant development pressure or provide significant development opportunity for a range of land use activities.

2.59 Section 3.10 Resource management with tangata whenua

Submitter	Submission	Summary
Kapiti Coast District Council	56/16	Stated that the role of tangata whenua is not given prominence in the proposed Regional Policy Statement and the submitter would like to see tangata whenua issues outlined at the start of the policy statement. Generally supported the intent of the objectives and policies. Noted that method 31 shows lwi management plans as a significant document that will inform statements and policies. Expressed concern as to whether lwi would receive adequate support to develop these plans. Requested that significant resources be provided to enable lwi to develop these management plans.
Porirua City Council	100/8	Strongly supported the objectives and policies relating to resource management with tangata whenua.
F12/7	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
South Wairarapa District Council	112/17	Sought rewording to include tangata whenua also working with councils.

Submitter	Submission	Summary
Wellington City Council	131/12	Supported the objectives, policies and methods related to this topic.
Wellington Fish and Game Council	133/20	Supported the issues, policies and methods relating to resource management with tangata whenua and sought that they be retained.
Wellington International Airport Limited	134/5	Supported
F11/12	Paraparaumu Airport Limited	Support

(a) Discussion

Porirua City Council strongly supported the objectives and policies for ‘Resource management with tangata whenua’. Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd supported the submission. **Wellington City Council, Wellington Fish and Game Council** and **Wellington International Airport Limited** also supported the objectives and policies. The submission by Wellington International Airport was supported by Paraparaumu Airport Limited. The submissions are noted.

Kapiti Coast District Council stated that the role of tangata whenua had not been given prominence in the proposed Regional Policy Statement and sought that the tangata whenua issues be outlined at the start.

Greater Wellington has worked with the region’s iwi authorities during the development of the content and layout to the Regional Policy Statement. Representatives from the region’s iwi authorities identified that all the issues in the sections to chapter 3 were issues of significance to iwi authorities. In addition to these, four further issues were identified as issues of significance to the region’s iwi authorities. These were included in section 3.10. An option discussed with the regions iwi authorities was to include an introductory chapter specific to tangata whenua. But the desire was to present all the regionally significant issues and issues of significance to tangata whenua together in an integrated and holistic way. It is noted that chapter 3 currently does not clearly state that all the issues listed for each topic (section), are not only regionally significant issues but are also issues of significance to the region’s iwi authorities. It is recommended that this be addressed by making amendments to the text at the start of chapter 3 and to each statement above the issue in each section. See

recommended changes to the introduction to chapter 3 and recommended changes below.

Kapiti Coast District Council also noted that method 31 indicated iwi management plans as significant documents to inform statements and policies. They expressed concern as to whether iwi would receive adequate support to develop these plans. Iwi management plans are not mentioned in method 31, but are in method 37. Iwi management plans are, and will be, significant documents to inform the implementation of policy 48. The concern about iwi receiving adequate resourcing should be noted. However, financial resourcing to develop iwi management plans is a matter for the Long-term Council Community Plan process not the Regional Policy Statement.

South Wairarapa District Council sought rewording to include tangata whenua working with Councils. It is noted that this request is already reflected in objective 22 which states, “The region’s iwi authorities and local authorities work together under treaty partner principles for the sustainable management of the region’s environment and for the benefit and wellbeing of the regional community, both now and in the future”. No changes are therefore necessary.

(b) Recommended decision

Submitter	Submission	Recommendation
Kapiti Coast District Council	56/16	Accept in part
Porirua City Council	100/8	Accept
South Wairarapa District Council	112/17	Reject
Wellington City Council	131/12	Accept
Wellington Fish and Game Council	133/20	Accept
Wellington International Airport Limited	134/5	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend the text above the issues, each topic section in chapter 3 (except section 3.10), to read:

The regionally significant issues and the issues of significance to the Wellington region’s iwi authorities for [insert relevant topic] are:

Amended the text above the issues in section 3.10 to read:

The additional resource management issues of specific significance to iwi authorities in the Wellington region and issues of regional significance are:

2.60 Objective 22

Submitter	Submission	Summary
New Zealand Historic Places Trust	87/9	Sought retention of objective 22.
Wellington City Council	131/63	Supported objective 22

(a) Discussion

New Zealand Historic Places Trust and **Wellington City Council** sought that objective 22 be retained. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
New Zealand Historic Places Trust	87/9	Accept
Wellington City Council	131/63	Accept

(c) Recommended changes

No changes to objective 22 are recommended.

2.61 Objective 23

Submitter	Submission	Summary
New Zealand Historic Places Trust	87/10	Sought retention of objective 23.
Wellington City Council	131/64	Supported objective 23

(a) Discussion

New Zealand Historic Places Trust and **Wellington City Council** sought that objective 23 be retained. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
New Zealand Historic Places Trust	87/10	Accept
Wellington City Council	131/64	Accept

(c) Recommended changes

No changes to objective 23 are recommended.

2.62 Objective 24

Submitter	Submission	Summary
New Zealand Historic Places Trust	87/11	Sought retention of objective 24.
Wellington City Council	131/65	Supported objective 24

(a) Discussion

New Zealand Historic Places Trust and Wellington City Council sought that objective 24 be retained. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
New Zealand Historic Places Trust	87/11	Accept
Wellington City Council	131/65	Accept

(c) Recommended changes

No changes to objective 24 are recommended.

2.63 Objective 25

Submitter	Submission	Summary
New Zealand Historic Places Trust	87/12	Sought retention of objective 25.

Submitter	Submission	Summary
Wellington City Council	131/66	Supported objective 25.

(a) Discussion

New Zealand Historic Places Trust and Wellington City Council sought that objective 25 be retained. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
New Zealand Historic Places Trust	87/12	Accept
Wellington City Council	131/66	Accept

(c) Recommended changes

No changes to objective 25 are recommended.

2.64 Objective 26

Submitter	Submission	Summary
New Zealand Historic Places Trust	87/13	Sought retention of objective 26.
Wellington City Council	131/67	Supported objective 26.

(a) Discussion

New Zealand Historic Places Trust and Wellington City Council sought that objective 26 be retained. The support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
New Zealand Historic Places Trust	87/13	Accept
Wellington City Council	131/67	Accept

(c) Recommended changes

No changes to objective 26 are recommended.

2.65 Objective 27

Submitter	Submission	Summary
Meridian Energy Limited	82/13	Sought that objective 27 be amended to read: objective 27 Adverse effects on the cultural relationships of Maori with their ancestral lands, water, sites, waahi tapu and other taonga are avoided, remedied or mitigated.’ Or, sought other amendments to address concern that the focus on avoidance was inconsistent with the Resource Management Act 1991.
F16/7	Genesis Energy	Support
F26/14	Mighty River Power	Support
F24/82	Masterton District Council	Support
Wellington City Council	131/68	Supported objective 27.

(a) Discussion

Meridian Energy Limited sought that objective 27 be amended so that it would state that effects are ‘avoided, remedied or mitigated’, instead of just ‘avoided’. They expressed a concern that the focus on avoidance was inconsistent with the Resource Management Act. Genesis Energy, Mighty River Power and Masterton District Council supported this submission.

Part II of the Resource Management Act seeks sustainable management of natural and physical resources. Sustainable management is defined in section 5(2) and clause (c) states while ‘avoiding, remedying, or mitigating adverse effects on the environment’. Objective 27 states that the outcome sought for the Wellington region is that effects on the cultural relationship of Maori, with their ancestral lands, water, sites and wahi tapu and other taonga, be avoided. The objective is in response to an issue of significance to the region’s iwi authorities. The objective is not inconsistent with the Act. All resource management decisions by local authorities are made in accordance with Part II of the Act. Objective 27 however clarifies that in making a decision, in accordance with Part II (and avoiding remedying or mitigating adverse effects), the Wellington region’s

objective (to address the issue of significance to the region's iwi authorities) is to avoid such effects. This objective is implemented by a policy (policy 48) that is to be 'given particular regard' when making resource management decisions. If the objective was changed, as requested by the submitter, then the objective would provide no further direction than can already be obtained by reading Part II of the Act and it would not respond to an issue of significance to the region's iwi authorities. It is therefore recommended that the focus on avoidance be retained.

Wellington City Council supported objective 27. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Meridian Energy Limited	82/13	Reject
Wellington City Council	131/68	Accept

All further submissions are rejected accordingly.

(c) Recommended changes

No changes to objective 27 are recommended.

2.66 Section 3.11 Soils and minerals

Submitter	Submission	Summary
Aggregate and Quarry Association of New Zealand	3/1	Sought that the explanation be amended to provide greater recognition for aggregates and their value to the region.
F1/1	Winstone Aggregates	Support
Winstone Aggregates	15/18	Sought that the description be amended as follows: 'In the Wellington region, sand, rock, gravel and limestone are extracted, from rivers, beaches, coastal cliffs and inland quarries...As the region's population continues to expand, the demand for mineral resources, particularly aggregate will increase. A sustained supply of aggregate will be needed to provide for building, construction and roading projects associated with this growth but also to maintain and redevelop existing infrastructure. Mineral resources are fixed in location, unevenly distributed and finite. Extraction processes, sites and transportation routes can create adverse environmental effects. If activities sensitive to the

Submitter	Submission	Summary
		<p>effects of extraction, and processing and transportation are established nearby, the full and efficient future extraction of these resources can be compromised. In the case of working sites, 'reverse sensitivity' effects can arise — meaning the extractive or processing operations may be forced to restrict or change their activities to avoid affecting the new neighbour. If resources closer to areas of high demand (such as the Wellington urban area including Wellington, Lower Hutt, Upper Hutt and Porirua cities) are compromised or precluded from being extracted, resources have to be obtained from further away, at significantly greater economic and environmental costs associated with aggregate transportation.</p> <p>And, the addition of a new paragraph as follows: It is important that potentially significant aggregate deposits and access routes to these resources are protected to ensure their availability. Obtaining access to resources in recent times has become a key issue addressed by the Environment Court in numerous cases, as residents and occupiers of sensitive activities (e.g. childcare centres, schools) along access routes object to noise and vibration generated by heavy vehicle movements, and quarries are severely limited in their output volume by restricted truck movements.</p> <p>In particular, it is important from economic, social and environmental perspectives that areas that have high demand for aggregate such as the Wellington urban area (including Wellington, Lower Hutt, Upper Hutt and Porirua cities) are able to be provided for by the extraction of resources in close proximity, as opposed to resources located at considerable distances away.</p>
Crown Minerals (Ministry of Economic Development)	26/2	Supported the matters raised under issues and objectives in 3.11 Soil and Minerals
Michael James Curtis	27/5	Opposed section. Stated that the Regional Policy Statement did not consider landowner rights and that there was no compensation to landowners who are affected.
F1/8	Winstone Aggregates	Oppose

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/21	Sought the introduction be amended as follows: <ol style="list-style-type: none"> 1. Reference technical reports and monitoring results in footnotes 2. Delete reference to Intensive farming as being responsible for declining soil quality 3. Amend paragraph 5 page 68 to include the full range of soil types and productive possibilities of the region 4. Delete second sentence in paragraph 7 page 68 "It is the legacy of poor land and/or waste management" <p>And Sought consequential changes to give effect to this relief sought</p>
F22/41	Anders Crofoot	Support
F19/23	Horticulture New Zealand	Support
Fonterra Co-operative Group Ltd	36/1	Noted that any soil is unable to sustain high levels of growth, whether farmed intensively or extensively, without minerals and nutrients being replaced within the soil reserve. Stated that this is not a phenomena peculiar to intensive farming.
F23/37	Federated Farmers of New Zealand	Support
Kapiti Coast District Council	56/17	Supported the objectives and policies, in particular policy 33 on avoiding development of contaminated land.
Porirua City Council	100/9	Supported the objectives, policies and method relating to this theme. Policy 68, and corresponding methods 15 and 54, were particularly supported.
F12/8	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support

Submitter	Submission	Summary
Wairarapa Regional Irrigation Trust	127/4	Page 69 The recognition that the region contains highly productive soils that have an economic value as an input to primary production and should be protected in some way from non-primary sector development such as subdivision was welcomed by the submitter
F19/24	Horticulture New Zealand	Oppose in part
Wellington City Council	131/13	Supported the objectives, policies and methods relating to this topic.
Wellington Fish and Game Council	133/21	Supported the issues, policies and methods relating to soils and minerals and sought that they be retained.

(a) Discussion

Aggregate and Quarry Association of New Zealand sought a change to the introduction of section 3.11 soil and minerals to provide greater recognition of the value of aggregates to the region. The submission was supported by Winstone Aggregates. Officers consider that the description of minerals on page 68 of the proposed Regional Policy Statement discusses in some detail the type of minerals that are in the region, their importance to the region as it grows and develops and the issues surrounding extraction. Officers consider this description adequate.

Winstone Aggregates sought changes to the introduction to section 3.11 soils and minerals. Specifically, the submitter requested changes to signal the need for mineral deposits to be located close to existing urban areas to reduce the cost of transport and the cost to the environment. The introduction to section 3.11 discusses aspects that the submitter alludes to, however not to the detail requested. Officers agree that some changes to the text are required, and have been taken note of, and included some of the submitter's suggestions. However, not all suggestions were relevant. In particular reference to obtaining access, and having quarries close to urban areas to reduce costs of transport.

Crown Minerals (Ministry of Economic Development) supported the matters raised in section 3.11 and the issues and objectives. The submitters support is noted.

Michael James Curtis opposed the section as it did not consider landowner rights. The submission was opposed by Winstone Aggregates. Officers note the submitters concerns; the Resource

Management Act however does not consider compensation for proposed Regional Policy Statement provisions that may affect landowners.

Federated Farmers of New Zealand sought a number of changes to section 3.11 soils and minerals. Specifically, they sought that the section should reference technical reports and monitoring results. The submission was supported by Anders Crofoot and Horticulture New Zealand. Officers agree, and note that all references to reports and monitoring can be found in the section 32 report for soils and minerals which is available on Greater Wellington's website or from our publications officer. The submitter sought the reference to 'intensive farming' be deleted from the section. Officers do not agree that the word 'intensive' should be deleted. The word has a common meaning in the Concise Oxford Dictionary to mean 'serving to increase production in relation to costs'. Officers note there other definitions available to represent what is meant by intensive farming and one such definition from a New Zealand farming document (sponsored by many farming groups including Federated Farmers of New Zealand) has been included in Appendix 3: Definitions. Officers consider this definition more appropriate to include in the proposed Regional Policy Statement. The submitter requested an amendment to paragraph 5 of page 68 to include the full range of soil types and productive possibilities in the region. Officers consider the words 'highly productive' for certain types of soils exclude other 'soils' that could be described as more productive. Officers have therefore made amendments to paragraph 5 to remove reference to 'highly productive'. In paragraph 7 the submitter sought changes to remove the phrase 'it is the legacy of poor land management and/or waste management'. Officers agree to the words being removed as they portray poor land management for contaminated sites which is not always the case.

Fonterra Co-operative Group Ltd noted the reference made in paragraph 5, page 68 to the fact that for soils to be productive they require the addition of fertiliser to maintain productivity. The submission was supported by Federated Farmers of New Zealand. Officers agree that indeed this is the case for most soils in New Zealand. However, the paragraph was intended to outline that for some types of agriculture soil mineral content can quickly diminish requiring fertilisers to maintain productivity.

Kapiti Coast District Council, Porirua City Council, Wellington City Council and Wellington Fish and Game Council supported the objectives and policies for soils and minerals. The Porirua City Council submission was supported by Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd. The submitters support is noted.

Wairarapa Regional Irrigation Trust supported the recognition placed in the soil and minerals section on productive soils that have an

economic value as an input to primary production. The submitters support is noted. The submission was opposed in part by Horticulture New Zealand who stated that all soils had economic value.

(b) Recommended decision

Submitter	Submission	Recommendation
Aggregate and Quarry Association of New Zealand	3/1	Reject
Winstone Aggregates	15/18	Accept in part
Crown Minerals (Ministry of Economic Development)	26/2	Accept
Michael James Curtis	27/5	Reject
Federated Farmers of New Zealand	35/21	Accept in part
Fonterra Co-operative Group Ltd	36/1	Noted
Kapiti Coast District Council	56/17	Accept
Porirua City Council	100/9	Accept
Wairarapa Regional Irrigation Trust	127/4	Accept
Wellington City Council	131/13	Accept
Wellington Fish and Game Council	133/21	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend paragraphs 5, 7 and 8, on page 68, in the introduction to section 3.11 soils and minerals, as follows:

....

The region has a small amount of land that ~~is~~ ~~could be described~~ as ~~highly productive and~~ suitable for multiple uses such as for growing a wide range of crops, pasture and forest, and for supporting grazing animals. This land is described as Class I and II land under the Land Use Capability classification.

.....

Contaminated land arises where hazardous substances are found or are reasonably likely to occur at levels that could have significant adverse effects on the environment. ~~It is the legacy of poor land and/or waste management.~~ There are more than 1,600 sites in the region that have a history of using, storing or manufacturing hazardous substances, including closed landfills. Contaminated land can make land unsuitable or unsafe for future land uses.

In the Wellington region, sand, rock, gravel and limestone are extracted ~~mined~~ from rivers, beaches, coastal cliffs and inland quarries. Oil and gas exploration are also ongoing in parts of Wairarapa and Kapiti. As the region’s population continues to expand, the demand for mineral resources, particularly aggregate (~~crushed rock used in building, roading and other construction~~), will increase. A sustained supply of aggregate will be needed to provide for building, construction and roading projects associated with this growth but also to maintain and redevelop existing infrastructure.

Mineral resources are fixed in location, unevenly distributed and finite. Extraction processes, sites and transportation routes can create adverse environmental effects. If activities sensitive to the effects of extraction, ~~and~~ processing and transportation are established nearby, the full and efficient future extraction of these resources can be compromised. In the case of working sites, reverse sensitivity can arise – such as a new garden centre needing to screen itself from dust.

2.67 Section 3.11 Soils and minerals - Issue 2: Reduction of soil health

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/22	Sought issue 2 be amended as follows: 2. Reduction of soil health Some land use practices can impact on the health of soil
F22/42	Anders Crofoot	Support
Horticulture New Zealand	50/14	Stated that objective 29 applies to all soils in the region – not just some. Yet policy 59 only sought to protect Class I and II soils. Stated that trying to protect Class 1 and II land from development was not supported as was inconsistent with the Resource Management Act 1991. Sought amendments to Issue 2 as follows: Some land use practices can impact on the health of the soil.
F22/43	Anders Crofoot	Support

(a) Discussion

Federated Farmers of New Zealand sought a change to issue 2 as they considered it drew a conclusion that a change in soil health will bring a total loss of life supporting capacity. The submission was supported by Anders Crofoot. Officers note the intent of issue 2 is to signal that a fall-off in soil health can ‘lead to’ a loss of life supporting capacity, if not kept in check. The key words for the issue are ‘lead to’. The submitter is suggesting a ‘total loss’ of life supporting capacity. This was not the intent or what is meant by the words. Officers agree however, to avoid further confusion the words ‘leading to the loss of life-supporting capacity’ should be removed from the issue.

Horticulture New Zealand sought the same relief for issue 2 as Federated Farmers of New Zealand. The submission of Horticulture New Zealand was supported by Anders Crofoot. Officers consider the removal of the words ‘leading to the loss of life supporting capacity’ will remove misunderstanding of the issue.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/22	Accept in part
Horticulture New Zealand	50/14	Accept in part

The further submissions from Anders Crofoot are accepted accordingly.

(c) Recommended changes

Amend issue 2 as follows:

2. Reduction of soil health

Some land use practices are reducing the health and productive capability of soils. ~~leading to the loss of its life supporting capacity.~~

2.68 Section 3.11 Soils and minerals - Issue 3: Highly productive agricultural land under threat from development

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/23	Sought that Issue 3 be deleted And Sought consequential amendments as to detail or substance throughout the Policy Statement, in particular the policy and method sections, to give effect to this

Submitter	Submission	Summary
		relief sought
F22/44	Anders Crofoot	Support
Horticulture New Zealand	50/15	Stated that objective 29 applies to all soils in the region – not just some. Yet policy 59 only sought to protect Class I and II soils. Stated that trying to protect Class I and II land from development was not supported as was inconsistent with the Resource Management Act 1991. Sought that Issue 3 be deleted
F22/45	Anders Crofoot	Support
F23/38	Federated Farmers of New Zealand	Support

(a) Discussion

Federated Farmers of New Zealand sought deletion of issue 3. They contend the issue of protecting highly versatile soils is outside the Resource Management Act. The submission was supported by Anders Crofoot. Officers note the various arguments from Federated Farmers of New Zealand about versatile soils. The issue for the Wellington region however is one of scarcity. The area of versatile soils is very small, yet the soil quality is extremely high. The ‘Manawatu Silt loam’ is one such soil variety that is small in area but high quality and is only represented on the Kapiti Coast at Otaki. This soil with the mild Kapiti Coast climate and the flat terrain makes it ideal for a variety of crops and/or stock units that would in other parts of the region require further intervention to maintain the same level of productivity. Officers therefore consider that highly versatile soils are significant to the Wellington region.

Horticulture New Zealand sought a similar relief as Federated Farmers of New Zealand concerning issue 3. Horticulture New Zealand accepted that class I and II soils do have inherent capabilities but consider that quality is not the only requirement for production. The submission of Horticulture New Zealand was supported by Anders Crofoot. Officers agree that the soil type and quality is not the only matter for production. However, the areas where the Wellington region’s high quality soils are located do not have many production constraints. On the Kapiti Coast, where better quality soils are located, the climate is suitable and the topography not a limiting factor. Officers consider that issue 3 is significant issue for the region. The resource is scarce and has a potential high productive worth.

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/23	Reject
Horticulture New Zealand	50/15	Reject

All further submissions are rejected accordingly.

(c) Recommended changes

There are no recommended changes to issue 3.

2.69 Section 3.11 Soils and minerals - Issue 5: Limited mineral resources

Submitter	Submission	Summary
Aggregate and Quarry Association of New Zealand	3/2	Sought retention of issue 5
Winstone Aggregates	15/19	Sought that issue 5 be deleted and replaced with the following two new issues: 5a Responsible and efficient utilisation of the region's significant mineral resources may be compromised through incompatible land uses, such as residential activity, located in the vicinity of mineral deposits and quarries and access routes to these deposits and quarries. The problem is most likely to arise where hard rock quarry sites and their access ways, are adjacent to residential and rural-residential subdivisions or adjacent to areas which can be subdivided. 5b A sustained supply of aggregate is essential to provide for the people of the region's social, economic and cultural wellbeing.
Higgins Group Holding Ltd	48/4	Sought that the discussion be expanded in order to 'set the stage' for more specific objectives, policies and methods to be included so as to ensure integrated management of aggregates and aggregate associated activities.
F1/39	Winstone Aggregates	Support in part

(a) Discussion

Aggregate and Quarry Association of New Zealand sought retention of issue 5. The submitters support is noted.

Winstone Aggregates sought the deletion of issue 5 and that it is replaced by two new issues. The submitter requested one issue to discuss the reverse sensitivity of residential activity located alongside quarries and access. The second issue concerned the sustained supply of aggregate for the future. Officers consider that the reverse sensitivity effects with respect to dust are adequately dealt with in issue 5 and in section 3.1 Air quality. Officers also consider that the issue of access to quarry sites and alike should not be addressed by the proposed Regional Policy Statement. Access would be part of any proposed application and needs to be resolved locally on a case-by-case basis. In regard to the second issue, officers consider that issue 5 satisfactorily describes the situation with regards to minerals in the region. Demand will increase over time, there are benefits from extraction, and the locations of minerals can be constrained by reverse sensitivity effects.

Higgins Group Holdings Ltd sought that the discussion be expanded to set the stage for more specific objectives and policies for aggregates in the region. The submission was supported in part by Winstone Aggregates. Officers consider the current issue discusses the situation with regards to minerals in an appropriate manner. It highlights the importance of the resource and the issue of extracting and transporting the resources to where it is needed. Officers therefore consider issue 5 appropriate.

(b) Recommended decision

Submitter	Submission	Recommendation
Aggregate and Quarry Association of New Zealand	3/2	Accept
Winstone Aggregates	15/19	Reject
Higgins Group Holdings Ltd	48/4	Reject

The further submission from Winstone Aggregates is rejected accordingly.

(c) Recommended changes

There are no recommended changes to issue 5.

2.70 Objective 28

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/24	Sought objective 28 be amended as follows: Land management and development practices do not accelerate soil erosion
F22/46	Anders Crofoot	Support
Wellington City Council	131/69	Supported objective 28.

(a) Discussion

Federated Farmers of New Zealand sought a change to objective 28 to include other development practices. The submission was supported by Anders Crofoot. Officers note the intent of the objective is to target land management practices rather than development. Not all development practices result in soil erosion. Land management practices do cover a large number of activities that potentially could lead to accelerated soil erosion and possibly sedimentation of waterways. Officers consider the objective is appropriate to address these activities.

Wellington City Council supported objective 28. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/24	Reject
Wellington City Council	131/69	Accept

The further submission from Anders Crofoot is rejected accordingly.

(c) Recommended changes

There are no recommended changes to objective 28.

2.71 Objective 29

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/25	Sought objective 29 be amended as follows: Soils maintain those desirable physical, chemical and biological characteristics that enable them to retain their ecosystem function and range of uses, including uses

Submitter	Submission	Summary
Zealand		that may not currently take place in the region.
F22/47	Anders Crofoot	Support
Wellington City Council	131/70	Supported objective 29.

(a) Discussion

Federated Farmers of New Zealand sought an addition to objective 29 for uses that ‘may not currently take place in the region’. The submission was supported by Anders Crofoot. Officers note the intent of the submission to address future uses. However the objective does not exclude future uses. Officers therefore do not consider it necessary to specifically state future uses in objective 29.

Wellington City Council supported objective 29. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/25	Reject
Wellington City Council	131/71	Accept

The further submission from Anders Crofoot is rejected accordingly.

(c) Recommended changes

There are no recommended changes to objective 29.

2.72 Objective 30

Submitter	Submission	Summary
Aggregate and Quarry Association of New Zealand	3/3	Sought retention of objective 30
Winstone Aggregates	15/20	Sought that objective 30 be amended as follows: The demand for mineral resources is met from local sources as much as possible and mineral deposits and access routes are protected to ensure their availability. In particular, areas that have high demand for aggregate such as the Wellington urban

Submitter	Submission	Summary
		area (including Wellington, Lower Hutt, Upper Hutt and Porirua cities) are able to be provided for by the extraction of resources in close proximity, as opposed to resources located considerable distances away. And, sought the addition of the following new objective which was included in the June 2007 draft revision of the Regional Policy Statement Minerals Provisions as follows: The locations of the region's significant mineral resources are identified and their use provided for.
Higgins Group Holdings Ltd	48/5	Supported in part. Sought additional methods directing regional plans and district plans to include specific objectives, policies and methods to enable aggregate extraction and processing activities, provided their adverse effects on the environment are avoided remedied or mitigated where practicable. Sought inclusion of provisions recognising the importance of river based aggregate extraction and to enable extraction for the purpose of the provision of aggregate for infrastructure as well as flood management and river control.
F1/40	Winstone Aggregates	Support in part
Ravensdown Fertiliser Co-operative Limited	104/4	Sought retention.
Wellington City Council	131/71	Supported objective 30.

(a) Discussion

Aggregate and Quarry Association of New Zealand and **Ravensdown Fertiliser Co-operative** sought retention of objective 30. The submitters support is noted.

Winstone Aggregates sought additional words to objective 30 to include specific mention of urban areas that should have aggregate areas provided for to meet future demand. Officers note the concern of the submitter, however not all urban areas have an adequate supply of rock materials suitable for the aggregate industry. Aggregates may need to be sourced from other nearby areas or from outside of the region. Officers consider objective 30 appropriate. No additional objectives are required for the issue of limited mineral resources in the Wellington region.

Higgins Group Holdings Ltd sought additional methods to direct district plans to provide for aggregate extraction activities and processing so long as the effects from these activities were avoided, remedied or mitigated. The submitter also sought inclusion of river based aggregate supplies for flood management and river control. The submission was supported in part by Winstone Aggregates. Officers do not consider the proposed Regional Policy Statement requires further policies to direct district or regional plans in addition to what is already provided for. Policy 60 is adequate to meet the mineral demand for the region into the future. It requires that applications for resource consents, designations or plan changes consider the social economic and environmental benefits of using mineral resources. This includes using river based aggregates. It also requires consideration of protecting the resources from incompatible land uses. Provisions in the proposed Regional Policy Statement also do not preclude district or regional plans from including further provisions for the aggregate industry to address more specific localised, or resource based, issues.

Wellington City Council supported objective 30. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Aggregate and Quarry Association of New Zealand	3/3	Accept
Winstone Aggregates	15/20	Reject
Higgins Group Holdings Ltd	48/5	Reject
Ravensdown Fertiliser Co-operative Limited	104/4	Accept
Wellington City Council	131/71	Accept

The further submissions from Winstone Aggregates is rejected accordingly.

(c) Recommended changes

There are no recommended changes to objective 30.

2.73 Chapter 4 Policies and methods

Submitter	Submission	Summary
Winstone Aggregates	15/21	Sought addition of a new policy to give effect to the proposed objective by the submitter as follows: District and Regional Plans make provision for rules which enable the development of clean and managed

Submitter	Submission	Summary
		fills so as to avoid compromising valuable landfill space through the disposal of such material.
F22/7	Anders Crofoot	Support

(a) Discussion

Winstone Aggregates sought the addition of a new policy to enable development of clean and managed fills to avoid using valuable landfill space. The submission was supported by Anders Crofoot. Officers agree that municipal landfills have limited space and are costly to manage over the long term. Cleanfills, however, are managed by national guidelines and through provisions in regional and district plans. Officers do not consider that clean fills require specific provision in the proposed Regional Policy Statement to substitute landfill space.

(b) Recommended decision

Submitter	Submission	Recommendation
Winstone Aggregates	15/21	Reject

The further submission from Anders Crofoot is rejected accordingly.

(c) Recommended changes

There are no recommended changes to Chapter 4 in response to the submission from Winstone Aggregates.

2.74 Section 4.1 Regulatory policies - direction for district and regional plans and the Regional Land Transport Strategy

Submitter	Submission	Summary
Aggregate and Quarry Association of New Zealand	3/4	Sought inclusion of an additional policy to read 'District and regional plans shall include policies, rules and/or methods that: a) recognise the social, economic, and environmental benefits from utilising mineral resources within the region; and b) protect the extraction and processing of significant mineral resources from incompatible or inappropriate land uses alongside.'
F1/2	Winstone Aggregates	Support
NZ Transport Agency	91/7	Requested a new policy be added to require district plans to include policies, rules, and/or other methods

Submitter	Submission	Summary
		that will discourage new subdivision and/or development from locations where infrastructure capacity is limited and will remain limited for the foreseeable future.
South Wairarapa District Council	112/18	Stated that in section 4.1 there should be policies that specifically look at the whole catchment of the Ruamahanga River. Noted that objectives 12, 13, 14 & 8 are all relevant and so are policies 11,12,13,14 15, 18, 39, 41, 43. Sought assurance that the whole river situation is addressed.
F19/25	Horticulture New Zealand	Support in part
F24/101	Masterton District Council	Support
The Energy Efficiency and Conservation Authority	117/10	Sought a new policy as follows in section 4.1: "Renewable energy in the coastal environment – district and regional plans District and regional plans shall include policies, rules and/or methods that recognise: (a) the benefits to be derived from the use and development of renewable energy sources in the coastal environment including national, regional and local benefits; and (b) the nationally significant wind and marine energy resources within the coastal environment and the need for electricity generation facilities to locate where these resources exist."
F8/12	TrustPower Limited	Support
F17/28	Meridian Energy Limited	Support
Wellington City Council	131/14	Sought: 1. That account be taken of the proposed amendment to the Resource Management Act 1991 deleting the requirement for the review of district plans after 10 years and to clarify when policies will have to be given effect to. 2. That an appropriate statement be included in the Regional Policy Statement recognising that in some cases the work required to give effect to policies may be substantial and this will affect the timing of when policies will be able to be given

Submitter	Submission	Summary
		effect to.
F6/6	Hutt City Council	Support
F20/41	Westfield New Zealand Ltd	Support

(a) Discussion

The **Aggregate and Quarry Association of New Zealand** sought an additional policy to direct district and regional plans to recognise significant mineral resources and protect them from incompatible uses alongside. The submission was supported by Winstone Aggregates. Officers do not consider the proposed Regional Policy Statement requires further policies to direct district or regional plans in addition to what is already is provided for. Policy 60 is adequate to meet the mineral demand for the region into the future. It requires that applications for resource consents, designations or plan changes consider the social, economic and environmental benefits of using mineral resources. This includes using river based aggregates. It also requires consideration of protecting the resources from incompatible land uses. In addition, provisions in the proposed Regional Policy Statement do not preclude district or regional plans from including further provisions for the aggregate industry.

NZ Transport Agency requested a new policy to require district plans to include policies, rules, and/or other methods to discourage new subdivision and/or development in locations where infrastructure capacity is limited and will remain limited for the foreseeable future. Policies 54, 55, 56 and 57 are considered to satisfactorily address the assessment of how new subdivision and/or development is managed and how regard should be given to limited infrastructure capacity. A new policy is not required.

The **South Wairarapa District Council** stated that in section 4.1 there should be policies that specifically look at the whole catchment of the Ruamahanga River and sought assurance that the whole river situation was addressed. This submission was supported by Masterton District Council and supported in part by Horticulture New Zealand. Objectives 12, 13, 14 & 8 are all relevant and so are policies 11, 12, 13, 14, 15, 18, 39, 41, 43. The policies identified will be applied catchment wide, including to the Ruamahanga River catchment. In addition policy 64 and method 29 take a whole of catchment approach.

The Energy Efficiency and Conservation Authority sought an additional policy recognising the benefits of renewable energy resources in the coastal environment and the need for renewable

energy generation facilities to be located near the resources. This submission was supported by TrustPower Limited and Meridian Energy Limited. Provision for renewable energy resources is already addressed in policies 6 and 38 and the policies apply to renewable energy generation in the coastal environment. It is therefore considered unnecessary to duplicate these with a specific policy for the coastal environment.

Wellington City Council stated that they had no concerns about the inclusion of the policies in section 4.1 as they relate to matters that are already being addressed to one degree or another and are valid resource management/planning issues that demand ongoing attention. They noted that the Council's original concern when the draft Regional Policy Statement was released was that the implementation of the policies would create a significant work load as they had to be actioned before or at the time of the next District Plan review (2010 in the case of Wellington City). Amending the District Plan to give effect to the policies is still required to commence on or before the date on which the Council commences its review of the District Plan. They stated however, that this did not take into account the proposal under the recent Resource Management Act (RMA) review to delete the requirement for 10 yearly plan reviews. They noted that without a 10 year review requirement, giving effect to policies will fall back on section 73 (5) of the RMA which specifies that if there is no time limit, implementation must be 'as soon as reasonably practicable'. They stated that this would provide flexibility for the Council and enable the appropriate prioritising of future work. They therefore sought that account be taken of the proposed amendment to the Resource Management Act 1991. In particular, the deletion of the requirement to review district plans after 10 years.

Since the time of submissions, the Resource Management Act Amendment Act 2009 has come into effect. This includes changes to section 79. Appendix 1 includes a copy of the revised text. Prior to the Amendment Act, section 79 required that a council commence a "full review" of a plan no later than 10 years after a plan became operative. The main effect of the Amendment Act changes is that a Council only needs to review provisions (i.e. issues, objectives, policies, rules or methods) that have not been reviewed over the last 10 years.

It is therefore recommended, in line with amended section 79 of the Resource Management Act that the policies in section 4.1 commence to be implemented in accordance with the review to "provisions" to a plan. Both methods 1, 2 and policies 34 to 60 be amended to reflect the changes by including reference to "provisions"; the word 'replacement' (as previously referred to in section 79) as used in the policies in section 4.2 be replaced with 'review'; a definition for "review to a district or regional plan" be included in Appendix 3: Definitions; and the reference to rolling reviews in method 1 be removed. See recommended changes to methods 1 and 2.

Wellington City Council also queried the extent to which existing District Plan provisions would be deemed to have met the intent of the Regional Policy Statement when adopted, as this would have a bearing on the work to be undertaken to give effect to the policies. They noted, however, that on this matter it is accepted that there will have to be continuing dialogue with Greater Wellington Regional Council to determine the current level of compliance.

They noted, however, that of the 22 policies to be given effect to by the Council the following have not been addressed and will require significant resources to action:

- Policy 4: Identifying the landward extent of the coastal environment
- Policy 10: Promoting energy efficient design and small scale renewable energy generation
- Policy 24: Identifying outstanding natural features and landscapes
- Policy 26: Identifying significant amenity landscape values
- Policy 28: Avoiding subdivision and development in areas at high risk from natural hazards.

They noted that given the likely scope of work required it is considered that there should be some acknowledgement that this will be ongoing from the time of the next review and beyond. They sought that an appropriate statement be included in the Regional Policy Statement recognising that, in some cases, the work required to give effect to policies may be substantial and this would affect the timing of when policies would be able to be given effect to. This submission point should be accepted and the need to ongoing discussion with territorial authorities to recognise existing plan provisions that already give effect to the policies in 4.1 be acknowledged. It is therefore recommended that a statement be included at the start of section 4.1 to reflect this. The submission points by Wellington City Council were supported by Hutt City Council and Westfield New Zealand Limited.

(b) Recommended decision

Submitter	Submission	Recommendation
Aggregate and Quarry Association of New Zealand	3/4	Reject
NZ Transport Agency	91/7	Reject
South Wairarapa District Council	112/18	Accept in part
The Energy Efficiency and Conservation Authority	117/10	Reject

Submitter	Submission	Recommendation
Wellington City Council	131/14	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend the text at the start of all policies in section 4.2 where they refer to ‘replacement’ [of district or regional plans] so instead they refer to ‘review’.

Amend the text at the start of section 4.1, to address submissions above, and the submission from Meridian Energy Limited discussed under section 4.2 of the Regional Policy Statement, as follows:

This section contains:

- policies that must be given effect to by regional, city or district plans (in accordance with sections 67(3)(c) and 75(3)(c) of the Resource Management Act, 1991)
- policies that the Wellington Regional Land Transport Strategy must ~~not~~ be inconsistent with (in accordance with section 75(a)(iii)(B) of the Land Transport Management Act 2008).

The policies are to be implemented in accordance with methods 1, 2 or 3. The methods require that the process to amend district or regional plans to implement the policies shall ‘commence’ on or before the date in which a relevant council commences the review of a provision in a district or regional plan in accordance with section 79 of the Resource Management Act 1991. This recognises substantial work may be required for councils to give effect to these policies.

Within this section the policies are presented in numeric order. The summary table below, however, lists the policy titles alongside topic headings.

2.75 Policy 1: Reverse sensitivity associated with odour, smoke and dust - district plans

Submitter	Submission	Summary
Aggregate and Quarry Association of New Zealand	3/5	Sought retention of policy 1
F15/6	Porirua City Council	Oppose

Submitter	Submission	Summary
Winstone Aggregates	15/22	Sought that policy 1 be amended as follows: "Policy 1: Reverse sensitivity associated with odour, smoke and dust- district plans District plans shall include policies and rules that prevent: (a) new sensitive activities locating near land uses or activities that emit odour, smoke or dust, which can affect the health of people and lower the amenity values of the surrounding area. And that clause (b) be deleted. Explanation New sensitive activities should not establish near land uses or activities that generate odour, smoke or dust."
F15/7	Porirua City Council	Oppose
F19/26	Horticulture New Zealand	Support
F25/4	New Zealand Defence Force	Support
F23/39	Federated Farmers of New Zealand	Support in part
Department of Conservation	31/1	Stated that in addition to amenity values, significant indigenous biodiversity values can also be adversely affected by the emissions of odour, smoke and dust. Sought that policy 1(b) be reworded so that it reads: "new land uses or activities that emit odour, smoke or dust and which can affect the health of people and lower the amenity or significant indigenous biodiversity values of the surrounding areas, locating near sensitive activities or areas."
F1/9	Winstone Aggregates	Oppose
F16/1	Genesis Energy	Oppose
F24/6	Masterton District Council	Oppose
Department of Corrections	32/4	Sought that policy 1 be retained in current form without modifications as they will potentially benefit Corrections by ensuring that sensitive activities are protected from new land uses or activities that emit

Submitter	Submission	Summary
		odours, smoke or dust.
F15/8	Porirua City Council	Oppose
East Harbour Environmental Association Incorporated	33/10	Stated the term 'reverse sensitivity' is grammatically odd and should be replaced with something more appropriate such as 'Separating sensitive from...' or 'Dissociating sensitive and (heavy) industrial activities'.
F13/26	Wellington International Airport Limited	Oppose
Federated Farmers of New Zealand	35/26	Sought that policy 1 be amended as follows: Reverse sensitivity associated with odour, smoke and dust – district plans District plans shall include policies and/or rules that manage the interface of different environmental zones and potential conflicts between established land uses and activities that may not normally be anticipated in those zones. Councils will focus on providing sources where potential landowners can obtain information in respect to land and the surrounding area. And Sought consequential amendments as to detail or substance throughout the Policy Statement, in particular the methods section, to give effect to this Submission
F19/27	Horticulture New Zealand	Support in part
F22/48	Anders Crofoot	Support
Higgins Group Holdings Ltd	48/6	Sought retention of policy
F15/9	Porirua City Council	Oppose
F25/5	New Zealand Defence Force	Support
Horticulture New Zealand	50/16	Sought inclusion of 'off target agrichemical spray drift' in policy 1.
F22/49	Anders Crofoot	Support

Submitter	Submission	Summary
New Zealand Defence Force	86/5	<p>Sought retention of the intent to policy 1, but the following changes:</p> <ol style="list-style-type: none"> 1. Amendments to the policy as follows: District plans shall include policies and/or rules that restrict: <ol style="list-style-type: none"> (a) new sensitive activities locating near land uses or activities that emit odour, smoke or dust, which can affect the health of people and/or lower the amenity values of the surrounding area; and.... 2. In the explanation bullet point 2 on page 80 be amended by deletion of the word "backyard". 3. That explicit cross referencing of policy 1 with policies 6, 7 and 38 be made. 4. The addition of a new consideration policy relating to air quality and reverse sensitivity effects which must be given particular regard to when assessing and deciding upon resource consents, notices of requirement or when changing, varying or replacing city, district or regional plans and a cross reference to a new consideration policy for the protection of regionally significant infrastructure (as also requested by this submitter).
F15/10	Porirua City Council	Oppose
Porirua City Council	100/10	<p>Opposed use of district plans to control the reverse sensitivity effects of odour, smoke and dust. Stated that such reverse sensitivity effects should be addressed by regional plans when considering applications for air discharge consents.</p> <p>Noted that earthworks and vegetation clearance are a necessary component of land development, and often occur in proximity to sensitive land uses (e.g. "Greenfield" sites adjacent to existing established residential areas) and that dust effects of such activity can be satisfactorily controlled through resource consent conditions. However, despite the necessity of such activities and satisfactory control of dust effects, policy 1 could be interpreted as requiring district plans to discourage such activity.</p> <p>Sought deletion of policy 1</p>

Submitter	Submission	Summary
F12/9	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
Ravensdown Fertiliser Co-operative Limited	104/5	Sought retention to prevent reverse sensitivity issues from arising.
F15/11	Porirua City Council	Oppose
Regional Public Health	105/1	<p>Stated that district plans should include policies and/or rules that discourage land uses or activities that produce discharges of other contaminants to air, for example, fine particulate in the close proximity of sensitive activities. For example, locating an early childhood centre next to a busy road or intersection where vehicles produce significant amounts of fine particulate and other potentially hazardous contaminants could adversely affect the health of children at the centre.</p> <p>Sought following changes policy 1:</p> <p>Policy 1: Reverse sensitivity associated with odour, smoke, dust and other contaminants– district plans</p> <p>(a) new sensitive activities locating near land uses or activities that emit odour, smoke, dust or other contaminants (e.g. fine particulate matter), which can affect the health of people and lower the amenity values of the surrounding area</p> <p>(b) new land uses or activities that emit odour, smoke, dust or other contaminants (e.g. fine particulate matter), which can affect the health of people and lower amenity values of the surrounding areas, locating near sensitive activities.</p> <p>Explanation</p> <p>New sensitive activities should not establish near land uses or activities that generate odour, smoke, dust or other contaminants that may adversely affect the health of people. The reverse is also true; new land uses and activities should be distanced from sensitive activities.</p>

Submitter	Submission	Summary
		Land uses or activities that may affect sensitive activities include: <ul style="list-style-type: none"> • activities which emit or cause odour – such as rendering, spray painting and solvent use, landfills, sewage treatment plants, silage feeding and effluent spreading. • activities which emit or cause smoke such as backyard burning. • activities which emit or cause dust – such as earthworks, quarries, and vegetation disturbance. • activities which emit or cause other contaminants that may adversely affect the health of people (e.g. fine particulate matter) – such as roads with high traffic use.
F15/12	Porirua City Council	Oppose
F19/28	Horticulture New Zealand	Support in part and oppose in part
F24/97	Masterton District Council	Oppose
Wellington City Council	131/72	Supported policy 1

(a) Discussion

Aggregate and Quarry Association of New Zealand supported retention of policy 1. The support is noted. The submission was opposed by Porirua City Council.

Winstone Aggregates sought a change to policy 1 to remove part (b) as it did not relate to reverse sensitivity, whereas part (a) did. Further, they were concerned with the direction of the policy to ‘discourage’ via rules. They contended that the word ‘discourage’ should be replaced with ‘prevent’, as rules cannot discourage. The submission was opposed by Porirua City Council, supported by Horticulture New Zealand and New Zealand Defence Force, and supported in part by Federated Farmers of New Zealand. Officers agree that part (a) of policy 1 may better reflect the understanding of reverse sensitivity as it is defined in the proposed Regional Policy Statement and the meaning that is well accepted in resource management planning. Part (b) however, is a related matter that should also be controlled through district plans. District plans control land use and the effects that may subsequently occur. Part (b) provides for this. It is recommended that the title of the policy should be altered to reflect that the policy is about sensitive activities as well as reverse sensitivity. Officers consider the word ‘discourage’ is appropriate in policy 1. A plan can

discourage through rules. Zoning is one mechanism that can be used, as are different resource consent activity categories or notification requirements. For example, certain activities can be discouraged using a non-complying activity status instead of discretionary, or discretionary instead of controlled. The word “prevent” is not considered appropriate as it likely to be interpreted to mean prohibit. The proposed change is therefore recommended to be rejected.

The **Department of Conservation** sought that part (b) of policy 1 be amended to include significant indigenous biodiversity values. The Department considered that biodiversity values may be affected by odour, smoke and dust and this should be provided for. The submission was opposed by Winstone Aggregates, Genesis Energy and Masterton District Council. Officers note that policy 1 is only concerned with the effects of odour, smoke and dust on people’s amenity values and wellbeing and not significant indigenous biodiversity. The proposed Regional Policy Statement has policies for significant indigenous biodiversity in section 3.6 – Indigenous ecosystems.

The **Department of Corrections** supported policy 1 in its current form. The support is noted. The submission was opposed by Porirua City Council.

East Harbour Environmental Association Incorporated sought clarification of the term ‘reverse sensitivity’. The submission was opposed by Wellington International Airport Limited. Officers note the term is used in resource management planning and is defined in the proposed Regional Policy Statement – Appendix 3 Definitions. The term has specific meaning for the effects that may be imposed on a new sensitive activity locating close-by an existing land use that causes an effect.

Federated Farmers of New Zealand sought several changes to policy 1 to reduce the bluntness of the policy approach that advocates for separation distances rather than considering many other instruments that are available. The submitter suggested that separation distances be a matter that is decided on a case-by-case basis and not through a planning response. The submission of Federated Farmers of New Zealand was supported by Horticulture New Zealand and Anders Crofoot. Officers note that discharges of odour, smoke and dust are a chronic issue in the region with odour discharges accounting for the majority of all pollution response call-outs by Greater Wellington. The *Regional Air Quality Management Plan* contains policies and rules to control odour from properties, however, these have not proved totally effective in managing the issue. Officers consider that further provisions are required in district plans to provide a stronger policy platform to solving the problem of odour and smoke and reverse sensitivity effects. It is considered that separation distances must be decided on a case by case basis within a suitable planning process. Policy 1 should provide this stronger policy approach. Policy 2 will

also be able to improve on existing policies in the *Regional Air Quality Management Plan* to achieve a higher level of policy effectiveness.

Higgins Group Holdings Ltd sought retention of policy 1. The submission was opposed by Porirua City Council, and supported by New Zealand Defence Force. Staff recommend retaining the policy with a minor amendment to the title.

Horticulture New Zealand sought an amendment to policy 1 to include the potential reverse sensitivity effects of ‘targeted agricultural spray drift’. The submission of Horticulture New Zealand was supported by Anders Crofoot. Officers note that there have only been isolated cases of spray drift incidences in the region and the matter was not considered to be significant for the proposed Regional Policy Statement. Targeted spray drift is controlled by the *Regional Air Quality Management Plan*, rules 1 and 2.

New Zealand Defence Force sought a variety of changes to policy 1. These include: the retention of the intent of policy 1 with explicit cross referencing with policies 6, 7 and 38; the word ‘discourage’ be removed and replaced with ‘restrict’; the word ‘backyard’ be removed from the explanation altogether; that a new policy added into section 4.2; that policy 1 to be removed from section 4.1 and be placed into section 4.2 as a consideration, and that policy 1 is cross referenced to a new consideration policy for regionally significant infrastructure. The submission was opposed by Porirua City Council. Officers would like to respond to the various submissions as follows. Policy 1 is already cross referenced with policies 6, 7, and 38 and further cross-referencing is not required. Officers consider the word ‘discourage’ is appropriate for policy 1 to direct district plans for policies and rules. In the explanation to policy 1, bullet 2 specifically references the word ‘backyard’ in relation to burning. The *Section 32: Air quality* report identifies backyard burning as one of the highest instances of smoke affecting amenity values and people’s wellbeing. To reduce the explanation to just ‘burning’ would not provide sufficient direction for this policy to district plans. Officers consider that policy 1, implemented by method 1 is the most effective approach. The request to make policy 1 a consideration in section 4.2 of the proposed Regional Policy Statement is not recommended because requiring district plans to address matters identified in the policy will be a more effective way of meeting the proposed Regional Policy Statement objectives.

Porirua City Council sought that policy 1 be removed from the proposed Regional Policy Statement. Porirua City Council contended policy 1 should not control land use activities to control reverse sensitivity effects. The submitter further contended policy 1 does not provide for existing land uses, and does not distinguish between temporal and long term effects from reverse sensitivity. The submission was supported by Kiwi Income Property Trust, Kiwi

Income Properties Ltd, Kiwi Properties Management Ltd. Officers note that policy 1 is primarily directed at district plans for land use control. The issue of odour, smoke and dust affecting amenity values and people's wellbeing is a chronic problem in the region, with odour in particular being the most frequently occurring pollution complaint in the region. In most cases the odour or smoke incident is a situation of sensitive activities such as residential areas developed alongside land uses that produce odour, smoke and dust. In these cases control may have been in place to prevent the discharge of odour or smoke but have proved inadequate. Officers consider that district plan controls are required to further strengthen provisions to prevent future discharges affecting people's amenity values. Policy 1 will provide a framework for further control. District plans will have to establish what level of control shall be applied to temporal activities and longer term activities. The policy targets new sensitive activities and new land uses, and district plans are able to include provisions about existing land uses. The example of earthworks affecting sensitive activities would only be for a short period of time and would not cause the sensitive activity to take any further action than is necessary. If the temporal dust producing activities continued this would be a matter for compliance.

Ravensdown Fertiliser Co-operative Ltd sought retention of policy 1. The submission was opposed by Porirua City Council. Staff recommend retaining policy 1 with an amendment to the title.

Regional Public Health sought changes to policy 1 to include reference to 'other contaminants (e.g., fine particulate matter), as other contaminants may affect the health of people. The submission was opposed by Porirua City Council and Masterton District Council, and supported in part and opposed in part by Horticulture New Zealand. Officers agree that if the concentration of 'other contaminants' reach high levels of concentration or up to toxic levels then there are effects on people. Policy 1 however is only concerned with odour, smoke and dust affecting amenity values and people's wellbeing. The policy is not concerned with the effects of these contaminants on the health of people as in most cases and situations the levels of exposure of these contaminants are not up to levels that would be harmful to human health. If levels of odour were up to toxic levels, for example, specific monitoring apparatus is required to establish this. In areas such as arterial roads where contaminants from motor vehicles are likely, monitoring by Greater Wellington shows that fine particulate (PM10), carbon monoxide (CO) and nitrogen dioxide (NO₂), which may affect people health, does not reach levels where this is the case. Policy 2 (b) specifically protects people's health from the effects of fine particulate matter from dust and smoke. The implementation of this policy will reduce the effects of fine particulates from one of the largest sources – domestic fires.

Wellington City Council supported policy 1. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Aggregate and Quarry Association of New Zealand	3/5	Accept
Winstone Aggregates	15/22	Accept in part
Department of Conservation	31/1	Reject
Department of Corrections	32/4	Accept
East Harbour Environmental Association Incorporated	33/10	Reject
Federated Farmers of New Zealand	35/26	Reject
Higgins Group Holdings Ltd	48/6	Accept
Horticulture New Zealand	50/16	Reject
New Zealand Defence Force	86/5	Reject
Porirua City Council	100/10	Reject
Ravensdown Fertiliser Co-operative Limited	104/5	Accept
Regional Public Health	105/1	Reject
Wellington City Council	131/72	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend the title of policy 1 as followings:

Discouraging new sensitive land uses near activities that emit Reverse sensitivity associated with odour, dust and smoke and land uses that emit odour, dust and smoke near sensitive activities

2.76 Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter – regional plans

Submitter	Submission	Summary
Airways Corporation of New Zealand Ltd	4/3	Sought that policy 2 be amended as follows: Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust , high velocity vertical discharges and fine particulate matter – regional plans Regional plans shall include policies and/or rules that: (a) protect or enhance the amenity values of neighbouring areas from discharges of odour, smoke and dust; (b) protect people’s health from discharges of dust, smoke and fine particulate matter; and (c) prevent discharges to air taking place within an Aerodrome Area, or outside an Aerodrome Area with a stack height of over 30m, without an aeronautical report confirming that it will not constitute a hazard to navigable airspace under Civil Aviation Rule Part 77.19(b) or (c).
F11/4	Paraparaumu Airport Limited	Support
F13/27	Wellington International Airport Limited	Support in part
Winstone Aggregates	15/23	Sought that policy 2 be amended as follows: Regional plans shall include policies and/or rules that: (a) avoid, remedy or mitigate adverse effects on the amenity values of neighbouring areas from discharges of odour, smoke and dust; and (b) avoid, remedy or mitigate adverse effects on people’s health from discharges of dust, smoke and fine particulate matter.
F23/40	Federated Farmers of New Zealand	Support in part
Department of Conservation	31/2	Stated that in addition to amenity values, significant indigenous biodiversity values can also be adversely affected, for example estuarine environments. Sought the following decision from the Council: A third statement is included that sets out: “(c) protect significant indigenous biodiversity values from

Submitter	Submission	Summary
		discharges of dust, smoke and fine particulate matter."
F1/10	Winstone Aggregates	Oppose
F16/2	Genesis Energy	Oppose
F24/7	Masterton District Council	Oppose
Federated Farmers of New Zealand	35/27	Sought policy 2 be amended as follows: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter in accordance with what is appropriate for the predominant land use and environmental quality of the character areas within the region (or words to this effect). And Sought consequential amendments as to detail or substance throughout the Policy Statement, in particular the methods section, to give effect to this Submission
F19/29	Horticulture New Zealand	Support
F22/50	Anders Crofoot	Support
Higgins Group Holdings Ltd	48/7	Sought amendment to policy 2 to allow activities involving discharges to air where effects on the environment can be avoided, remedied or mitigated and to state that a reduction in adverse effects on air quality is only necessary where existing levels of pollution are elevated.
Horticulture New Zealand	50/17	Sought an amendment to the explanation to policy 2 by stating: "The amenity values of an area will vary across the region and reflect the nature of activities undertaken in the area. For instance the rural area is a rural working production environment and the level of amenity value will reflect the odours, smoke, dust and agrichemical spray drift associated with rural production activities."
F1/44	Winstone Aggregates	Support
F22/51	Anders Crofoot	Support
F23/41	Federated Farmers of	Support

Submitter	Submission	Summary
	New Zealand	
Masterton District Council	74/6	Requested that the preparation of an Airshed Action Plan be carried out in consultation with the Masterton District Council and their community.
Tararua Tramping Club	114/11	Stated that it would be more appropriate to put avoiding, and assuming that is impractical, reducing the amount of, discharge of pollutants (whether to land, sea or air) before taking steps to reduce the adverse effects of such pollution.
F1/86	Winstone Aggregates	Oppose
The Energy Efficiency and Conservation Authority	117/11	Sought the following addition to the explanation to policy 2: There is potential in the region for the use of cleaner fuels combined with modern burning technologies which utilise wood pellets, firewood, fire-logs and wood chips in residential and commercial wood burners. These can reduce fine particulate matter compared with non-renewable fuels, and displace carbon dioxide emissions and improve local amenity"
Wellington City Council	131/73	Supported policy 2

(a) Discussion

Airways Corporation of New Zealand Ltd sought a change to policy 2 to include high velocity discharges and a new clause to control the stack height of chimneys over 30 metres so they do not affect navigable airspace. The submission was supported by Paraparaumu Airport Limited and supported in part by Wellington International Airport Limited. Officers note that policy 2 is concerned with protecting health and amenity values of people from odour, smoke and dust and the discharge of fine particulate matter. The requirement to include specific reference to aircraft movement civil aviation rules and high velocity vertical discharges is outside the scope of this policy and are overly specific matters that would become part of any district plan or regional air plan rule development. Officers recommend policy 2 remain in its current form and specific matters concerning aircraft movement be dealt with during regional plan or district plan development.

Winstone Aggregates sought an amendment to policy 2 to remove the words 'protect and enhance' and replace with the words 'avoid, remedy and mitigate'. The submission was supported in part by Federated Farmers of New Zealand. Officers consider the words in the policy 'protect or enhance the amenity values of neighbouring areas'

and ‘protect people’s health’ are appropriate to manage the adverse effects of odour, smoke and dust and fine particulate matter. Officers note that it is not a requirement or necessary to repeat in the policy “avoid, remedy or mitigate” because it is already a requirement of the Resource Management Act. Policy 2 provides more specific direction in order to address the regionally significant issue identified in the Regional Policy Statement.

Department of Conservation sought an additional clause to policy 2 to include a statement that regional plans protect significant indigenous biodiversity values from the discharges of dust, smoke and fine particulate matter. The submission was opposed by Winstone Aggregates, Genesis Energy, and Masterton District Council. Officers note that policy 2 is concerned with the effects of odour, smoke, dust and fine particulate matter on people’s amenity values and wellbeing. Policies dealing with significant indigenous biodiversity are addressed fully in section 3.6 of the proposed Regional Policy Statement.

Federated Farmers of New Zealand sought a change to policy 2 to take into account predominate land use and character areas within the region. The submission of Federated Farmers of New Zealand was supported by Horticulture New Zealand and Anders Crofoot. Officers note that policy 2 directs regional plans to include provisions to protect amenity values from the discharge of odour, smoke and dust and protect people health from the discharge of smoke and dust and fine particulate matter for the entire region. Officers agree that there could be differences in the amenity values perceived by people in different locations. However, these differences can be addressed when the policy is implemented in regional plans. To include this reference into policy 2 would make the policy overly specific and reduce the effectiveness of the policy for some areas. Officers recommend that policy 2 remain in its current form to protect and enhance amenity values and people’s health, and other matters such as land use and character areas are dealt with during the development of the regional plan.

Higgins Group Holdings Ltd stated that policy 2 was unduly restrictive as it did not consider the operational realities of quarrying and aggregate sites. Higgins Group Holdings Ltd sought that the policy include specific wording referring to the effects on the environment. Officers consider that the policy is not unduly restrictive in proposing to protect and enhance amenity values and human health. There are likely to be issues with neighbouring areas regarding odour, smoke and dust and these will have to be worked through during regional plan development. To change the policy to take into account neighbouring areas would make the policy overly complicated and reduce its overall effectiveness in protecting people’s amenity values and health. Officers also consider that it is not necessary to refer to the Resource Management Act regarding adverse effects in relation to policy 2.

Horticulture New Zealand sought a change to policy 2 to take account of the nature of activities in the rural sector as these will have an effect on the level of amenity values. The submission was supported by Anders Crofoot, Federated Farmers of New Zealand and Winstone Aggregates. Officers consider that the policy to protect and enhance amenity values is appropriate and agree that there will be differences with people's perception of odour, smoke and dust depending on their local environment. However, these differences would be more appropriately dealt with during regional plan development, rather than building these differences into the policy at this stage.

Masterton District Council sought that the airshed action plan be carried in consultation with the Council and local community. Officers agree that any airshed action plan that is developed for the Wairarapa airshed will be carried out in full consultation with the Masterton District Council and the local community.

Tararua Tramping Club sought the policy should address avoiding in the first instance, and then if that is impractical, reducing the amount of discharge of pollutants. The submission was opposed by Winstone Aggregates. Officers consider the principal aim of the policy is to protect amenity values and human health. It is not necessary to describe the requirements of the Resource Management Act to reduce adverse effects by avoiding, remedying and mitigating.

The Energy Efficiency and Conservation Authority supported the air quality policies but noted that the use of renewable energy sources (wood) over non-renewable energy sources (coal) should be included in the explanation. Officers agree that wood based products for low emission burners are a possible clean air outcome for airsheds that currently exceed the air quality standards or are close to exceeding the guidelines. There are other low emission heating units on the market that are also just as effective. Officers consider that the policy is about protecting human health from fine particulate pollution; the exact way this is achieved is something that would be considered in the regional plan, an airshed action plan or left up to the individual household to decide on.

Wellington City Council supported policy 2. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Airways Corporation of New Zealand Ltd	4/3	Reject
Winstone Aggregates	15/23	Reject
Department of Conservation	31/2	Reject

Submitter	Submission	Recommendation
Federated Farmers of New Zealand	35/27	Reject
Higgins Group Holdings Ltd	48/7	Reject
Horticulture New Zealand	50/17	Reject
Masterton District Council	74/6	Accept
Tararua Tramping Club	114/11	Reject
The Energy Efficiency and Conservation Authority	117/11	Accept in part
Wellington City Council	131/73	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

There are no recommended changes to policy 2.

2.77 Policy 3: Discouraging development in areas of high natural character in the coastal environment – district and regional plans

Submitter	Submission	Summary
Anders Crofoot	25/9	Stated that it needed to be recognised that much of the Wairarapa is farmed, this includes fencing, farm buildings, dams, and tracks as part of normal practice. These should not be subject to extra layers of intervention just because the land is on the coast.
F23/42	Federated Farmers of New Zealand	Support
Department of Conservation	31/3	Stated that despite the intention to protect natural character in the coastal environment by the inclusion of such a policy, stated that the Regional Policy Statement did not require councils to undertake such an assessment of natural character. Policies 22, 24, and 26 require councils to identify significant biodiversity values, outstanding natural features and landscapes, and significant amenity landscape values, and while these policies may identify many of the areas of natural character in the coastal environment, it will not identify all such areas in the coastal environment. For the Regional Policy

Submitter	Submission	Summary
		<p>Statement to be internally consistent with policies 21, 22, 23, 24, 25 and 26 the form and focus of policy 3 needs to be restated in the same format as those policies.</p> <p>Sought the following decisions from the Council:</p> <p>1. Policy 3 be replaced with the following two policies: Policy 3A: District and regional plans shall identify areas [or places] of natural character of the coastal environment (including the coastal marine area) using the following criteria: [use the factors identified in policy 35]. Policy 3B: Where natural character values of the coastal environment (including the coastal marine area) have been identified in accordance with policy 3A, district and regional plans shall include policies, rules and/or methods that protect the natural character values of the coastal environment (including the coastal marine area) from inappropriate subdivision, use or development.</p> <p>2. That any policy relating to the natural character in the coastal environment is not qualified by the use of the word 'high', or any other similar qualifier.</p>
F1/11	Winstone Aggregates	Oppose
F6/1	Hutt City Council	Oppose
F8/13	TrustPower Limited	Oppose in part
F10/1	Wellington Fish and Game Council	Support
F19/30	Horticulture New Zealand	Support in part and oppose in part
F26/45	Mighty River Power	Oppose
F24/8	Masterton District Council	Oppose
Federated Farmers of New Zealand	35/28	<p>Sought policy 3 be amended as follows: Discourage inappropriate development in areas of high natural character in the coastal environment – district and regional plans And</p>

Submitter	Submission	Summary
		Sought consequential amendments as to detail or substance throughout the Policy Statement, in particular the methods section, to give effect to this Submission
F1/31	Winstone Aggregates	Support
F8/14	TrustPower Limited	Support in part
F22/52	Anders Crofoot	Support
F24/42	Masterton District Council	Support
Horticulture New Zealand	50/18	Sought deletion of b) inappropriate use from policy 3. Concerned that there is no direction as to how 'inappropriate use' may be determined.
F8/15	TrustPower Limited	Oppose
F22/53	Anders Crofoot	Support
Kapiti Coast District Council	56/18	<p>Stated that policy was not strong enough to prevent developments in currently rural areas along the Kapiti Coast. Requested that as a minimum the words "high natural character" be modified to "high natural character or amenity value" in policies 3 and 35 to cover a wider range of land.</p> <p>Was concerned that 'high' natural character is very subjective. It could be argued that an area used for agriculture, this is not entirely 'natural', does not have high natural character. Stated that policy 3 seems to read that we would enable new subdivision, use and developments in areas that are not identified as having "high natural character".</p> <p>Stated that policy 35 goes into some detail to assist planners in determining what 'high natural character' means. But the criteria in policy 35 did not indicate any tipping point for when natural character is no longer 'high'. Stated that greater guidance on coastal subdivision would be useful due to the continuing demand for coastal subdivision.</p>
F1/47	Winstone Aggregates	Oppose

Submitter	Submission	Summary
John and Julie Martin	73/1	Objected to the principle of "discouraging" development in the coastal environment, stating that new subdivisions are a natural part of progress, and sought for councils to be encouraged to consider new subdivisions and developments that blend in and enhance the coastal location.
Pamela Joy Meekings-Stewart	81/1	Sought that policy 3 be amended to include flexible criteria, taking into account sustainability, ecological protection and "community good" when assessing development in areas of high natural character in the coastal environment to ensure the process is simple, easily accessible, straightforward and affordable particularly for "low level" or "mini-developments".
Meridian Energy Limited	82/14	Sought that the policy be amended to read: 'District and regional plans shall include policies, rules and/or methods that discourage (a) new subdivision; and (b) inappropriate use or development; on land in the coastal environment that has high natural character' and consequential amendments to the explanation.
F1/55	Winstone Aggregates	Support
F8/16	TrustPower Limited	Support
F24/81	Masterton District Council	Support
Mighty River Power	83/18	Sought that the policy be amended to read: 'District and regional plans shall include policies, rules and methods which discourage inappropriate subdivision, use and development in areas of high natural character in the coastal environment.'
F1/71	Winstone Aggregates	Support
F8/17	TrustPower Limited	Support
F16/19	Genesis Energy	Support
F23/43	Federated Farmers of New Zealand	Support

Submitter	Submission	Summary
F24/91	Masterton District Council	Support
Porirua City Council	100/11	<p>The submitter did not specifically oppose this policy. However, raised concern that the implementation of this policy will have potential difficulties, as it will either require district plans to identify areas with high natural character, or introduce generic policies and rules for this purpose that could be difficult to apply. In particular, it may be difficult to apply this policy to areas in the coastal environment that contain boat sheds.</p> <p>Sought that Greater Wellington give further consideration to how this policy will be interpreted and the methods by which it shall be applied, having regard to its efficiency and effectiveness.</p>
F12/10	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
Tararua Tramping Club	114/12	<p>Accepted that, as the explanation says, "the Resource Management Act 1991 does not preclude appropriate use and development" and so the policy cannot be stronger than to discourage "(a) new subdivision and/or development". However, state that almost by definition the policy can and should prevent, not simply discourage, "(b) inappropriate use". Sought that the Statement be modified to specify that.</p>
TrustPower Limited	124/15	<p>Sought that the policy be amended to read: 'Discouraging inappropriate development in areas of high natural character in the coastal environment – district and regional plans District and regional plans shall include policies, rules and/or methods that discourage inappropriate subdivision, use, and/or development on land in the coastal environment with high natural character.' Also sought that the explanation be amended to read: 'Policy 3 requires district and regional plans to discourage inappropriate subdivision, use, and development in areas considered to have 'high' natural character. Councils must assess land in the</p>

Submitter	Submission	Summary
		coastal environment to ascertain which areas have high natural character, in order to discourage inappropriate subdivision, use and development in these areas, and to determine what potentially would be appropriate development and use on this land, depending on the attributes associated with an area's high natural character. Potentially appropriate development and use should include those activities with regional and/or national benefits that have been carefully designed to avoid, remedy or mitigate any actual or potential adverse effects on the coastal environment.
F1/91	Winstone Aggregates	Support
F24/107	Masterton District Council	Support
F26/33	Mighty River Power	Support
Wellington City Council	131/15	Sought that the explanations to policy 3, 24, 25, 26 and 27 (and 35 and 49) include a plain-English explanation, with examples, of how the policies overlap and function together. Stated that it must clearly explain the concept of human-made and human-maintained landscapes, and explain that human-made landscapes can be as highly valued as natural landscapes.
F24/121	Masterton District Council	Support in part

(a) Discussion

Greater Wellington has a responsibility under the Resource Management Act (1991) and the operative New Zealand Coastal Policy Statement (1994) regarding the preservation of the natural character in the coastal environment and its protection from inappropriate subdivision, use and development under section 6(a).

In response to a number of submissions expressing concerns with the policies in the coastal environment, policy 3 and policy 35 have been substantially reworded to meet those concerns. Policy 3 now addresses the protection of areas of high natural character from inappropriate subdivision, use and development and provides guidance on how to determine the degree of natural character.

This policy works together with policy 34 which gives guidance as to how natural character is preserved and policy 35 which now addresses how to assess the appropriateness of activities to assist with managing effects on natural character in the coastal environment. Other policies also support the overall preservation of natural character through the protection of the values which may contribute to natural character (policies 21, 23, 25 and 27) and it is recommended that these policies are specifically included in the list of policies to implement objective 4 in Table 2.

Require identification

The **Department of Conservation** considered that, in order to achieve the purposes of the Act and the protection of natural character in objective 4, the Regional Policy Statement needs to *require* the identification of natural character in district and regional plans. They suggested that the policy should be divided into an ‘identification’ policy and then a ‘protection’ policy, to be consistent with the identification of different values as required under policies 20, 22, 24 and 26. **Porirua City Council** however expressed concern that the policy could, by implication, already require this identification exercise. In further submissions, Masterton District Council, Hutt City Council and TrustPower Limited opposed the Department of Conservation’s view, while Wellington Fish and Game Council generally supported it and Horticulture New Zealand supported identification.

The explanation to this policy outlines that identification of the degree of natural character in specific areas is not required to give effect to the policy. While councils will need to assess whether they have adequate protection for high natural character in the coastal environment in their plans, they may conclude that their existing plan provisions are adequate. The policy has been amended to provide guidance on the assessment of natural character.

Greater Wellington staff accept that defining the degree and distribution of the natural character in the region’s coastal environment, including the identification of areas of high natural character, may eventually form part of the implementation of the Regional Policy Statement for some districts. However, as natural character is more than, and different to, the sum of individual values, there is no lack of internal consistency with the policy structure for historic heritage, indigenous ecosystems and landscape.

However, Greater Wellington staff consider that the initiatives in the Regional Policy Statement related to identification of historic heritage, indigenous ecosystems and landscape will provide information which will be used for the determination of natural character. Method 49 includes the establishment of a regional Geographical Information System database and district by district landscape character assessment projects funded by the Greater Wellington Regional

Council as a starting point for the evaluation of landscapes, including the coastal environment.

Use of the qualifier 'high' for natural character

Wellington City Council supported the use of the qualifier 'high' for natural character, while the **Department of Conservation** wanted it removed from the policy as natural character is not qualified in this way in either the New Zealand Coastal Policy Statement 1994 or in the Resource Management Act 1991. **Kapiti Coast District Council** was concerned that the term 'high natural character' is very subjective and that it could be taken that subdivision or development in modified areas will not be considered under these policies. TrustPower Limited, Horticulture New Zealand, Mighty River Power, Masterton District Council, Winstone Aggregates and Hutt City Council further submitted in opposition to the Department of Conservation's submission. Wellington Fish and Game Council further submitted in support.

Areas of 'high' natural character are less compromised in the continuum of natural character value which exists in the coastal environment. The intention in using the term 'high' gives guidance as to those areas of natural character which are most deserving of protection, within the framework of preserving natural character. Greater Wellington staff consider that the policy as worded will meet the outcome envisaged in the New Zealand Coastal Policy Statement (Policy 1.1.1), which implies that encouraging development in already modified coastal areas assists to preserve natural character by avoiding development in areas of high natural character.

The Environment Court has held, in the case *Clyma vs Otago Regional Council* (W117/96), 1996, that all parts of the coastal marine area possess natural character. If so, section 6(a) cannot logically seek to strictly preserve natural character as this would prevent any modification to any part of the coastal marine area.

The intention of this policy is to add value to section 6(a) by giving guidance on how to protect priority areas, rather than a general duty to preserve, or, a de facto enabling of subdivision, use and development in other areas. The general duty under Part II of the Act still applies and the weighing up of other section 6 and section 7 matters. The Department of Conservation submission point is, therefore, recommended to be rejected.

Indigenous ecosystem and landscape policies support the overall preservation of natural character and the protection of values which contribute to natural character. To emphasise the role of the protection of natural character afforded by other policies, Greater Wellington staff recommend that these policies (policies 23, 25 and 27) are specifically included in the list of policies to implement objective 4 in Table 2.

To assist councils, policy 3 now lists the matters to be assessed when determining the degree of natural character whilst the amendments to policy 35 provide the matters to have particular regard to when determining what is appropriate subdivision, use and development in the coastal environment. Submitters are asked to note that social values (c) have been deleted from the assessment matters and refer to the discussion in policy 35 for the reasoning.

Guidance on 'high' qualifier

Kapiti Coast District Council recognised the usefulness of the proposed determinants of natural character but asked for further guidance on when natural character is no longer 'high'. They suggested that a 'tipping point' or threshold would be useful when assessing coastal subdivision applications. Greater Wellington staff initially accepted this point, but discovered that attempts to provide such a threshold (for example 'unmodified or slightly modified landscape') can lead to an oversimplification which undermines the concept of natural character.

Natural character is based on the integrity of the natural processes, patterns and elements of an area, and the degree of modification of that naturalness. The evaluation is not based on the specialness/significance or uniqueness of one or more criteria or factors as can be the evaluation of indigenous ecosystems, landscape and other values. It is the complex integration of naturalness and human influence. As an example, the natural processes may be little changed, but may not result in high natural character if there are extensive physical modifications to the area.

Greater Wellington staff also consider that the threshold of what is considered 'high natural character' on the continuum of natural character will also change depending on the context of the district or region. A community with a highly modified coastal environment may well decide that the few relatively unmodified areas are of high value for their district; whereas in another district these areas would be considered relative to a more pristine environment and not be so highly valued. Deciding where the threshold lies is better addressed at a district level as it is part of the evaluation that districts will undertake when implementing the policy.

Therefore, the submission by Kapiti Coast District Council recommended to be rejected.

Discourage, prevent or protect

Submitters **John & Julie Martin** considered that the Resource Management Act 1991 does not preclude appropriate use and development in the coastal environment and therefore policy 3 should not discourage development. They would like to see appropriate subdivisions encouraged. **Tararua Tramping Club** also accepted the

intent of the Act but considered that the policy should ‘prevent’ inappropriate use rather than just ‘discourage’ it.

The wording of this policy has now been revised to clarify that its intent is to protect areas of ‘high’ natural character from inappropriate subdivision, use and development rather than ‘discouraging’ or ‘preventing’ those activities. The appropriateness of subdivision, use and development proposals will still be considered under the general purpose of Part II of the Act and matters in sections (6) and (7), and, policy 35 gives guidance as to what is considered inappropriate in these environments.

Use of the qualifier ‘inappropriate’ or ‘new’

A number of submitters were concerned about the use of the qualifiers ‘new’ for subdivision and development and ‘inappropriate’ for use, and sought changes to the wording of policy 3. **Meridian Energy Limited** wanted ‘new’ to apply only to subdivision, as they did not consider all forms of use and development as inherently inappropriate. **Mighty River Power** considered that the proposed wording implies all new subdivision and development is inappropriate and **TrustPower Limited** considered that there could be new development which is appropriate and that the wording should be ‘inappropriate subdivision, use and development’.

Winstone Aggregates and Masterton District Council further submitted in support of all three submitters. TrustPower Limited supported Meridian Energy Limited and Mighty River Power. Genesis Energy and Federated Farmers of New Zealand also supported Mighty River Power and Mighty River Power supported TrustPower Limited.

The **Department of Conservation** also sought the wording from the Act. **Federated Farmers of New Zealand** wanted the wording ‘discourage inappropriate development’ as they and **Horticulture New Zealand** were concerned that the policy wording should not preclude appropriate use and development within the coastal environment. Winstone Aggregates, Masterton District Council, and TrustPower Limited supported the submission of Federated Farmers of New Zealand.

Policy 3, as proposed, attempted to distinguish between new subdivision and development which could be considered to have a higher impact than existing activities, and those wider land uses which could be better assessed and tested for appropriateness. Greater Wellington staff agree with the submitters that these distinctions could be misleading and that some new subdivision and development could be appropriate in areas of high natural character.

Preservation of the natural character of the coastal environment and protection from inappropriate subdivision use and development is a matter of national importance in the Act. In order to be consistent with

the Act, Greater Wellington staff recommend that these submissions be accepted and that policy 3 is better worded as ‘inappropriate subdivision, use and development’.

Horticulture New Zealand was concerned with how ‘inappropriate use’ may be determined and wanted the clause deleted. TrustPower Limited opposed this submission. Greater Wellington staff recommend that this submission point is rejected as the suggested amendments to policy 35 will provide district councils, landowners and developers with more robust guidance on determining the appropriateness of activities with regard to natural character.

Other matters

Anders Crofoot wanted recognition that farming on the coast was a legitimate activity and that farming activities have formed much of the modified natural character value in the coastal environment. Federated Farmers of New Zealand submitted in support of this concern. **Wellington City Council** wanted it to be clear that modified landscapes are still highly valued. These matters have been partially accepted by additions to the introduction and the matters now listed in this policy, which illustrate that natural character exists in a continuum from pristine to highly modified and that natural character is assessed relative to the extent of modification.

TrustPower Limited also requested additions to the explanatory text to highlight the potential appropriateness of activities with regional and national benefits. This submission point is recommended to be rejected, as the matters are dealt with under other policies in the Regional Policy Statement which will also be considered when undertaking activities in the coastal environment.

Porirua City Council did not specifically oppose the policy but were concerned that the application of the policy posed difficulties. They stated that councils may need to complete the identification of areas of high natural character in order to provide policies specific enough to be useful in the planning context. These points are accepted and both this policy and policy 35 have been substantially rewritten. Kiwi Income Property Trust, Kiwi Income Properties Ltd and Kiwi Properties Management Ltd further submitted in support of Porirua City Council.

Pamela Meekings-Stewart wanted flexible criteria including ‘community good’ and ‘sustainable management’ to ensure a simple and easily accessible process for assessing development in areas of high natural character. Greater Wellington staff consider that the changes to policy 3 and 35 will provide for a straightforward process by providing guidance on the assessment of natural character and the appropriateness of development.

Kapiti Coast District Council also submitted that the protection of high natural character would not be adequate to protect against development in rural coastal areas and wanted the policy to incorporate both high natural character and amenity value to cover a wider range of land. Winstone Aggregates further submitted in support. Greater Wellington staff consider that the changes proposed to policy 35 will address the submitter’s concerns. They also comment that the Regional Policy Statement is an integrated document and that a number of other policies addressing specific values will need to be considered when assessing the appropriateness of an activity in the coastal environment. Policy 34 (c) & (d) address amenity values specific to the coastal environment and policies 26 and 49 specifically address significant amenity landscapes.

Wellington City Council sought an explanation of the concept that human-made and human-maintained landscapes can be highly valued as natural landscapes. Greater Wellington staff consider it appropriate to provide clarification in the introduction of the coastal section to explain the continuum of natural character in the coastal environment and the concept of working landscapes. It is therefore recommended to amend the explanation as requested by the submitter.

Wellington City Council also sought a “plain-English” explanation of how policies 3, 24, 25, 26 and 27 were to be interpreted in relation to each other, specifically whether characteristics which are valued under one policy can also be valued under another. Masterton District Council supported this position. Greater Wellington staff contends that there may very well be examples where an area of the coastal environment is valued under different policies. An example could be an outstanding natural feature such as a rock outcrop, which contributes to an area of high natural character in the coastal environment, and which is part of a significant amenity landscape, but is not an outstanding landscape. It is considered that worked examples of how the policies interact are not appropriate in the body of the Regional Policy Statement. It is not recommended to make an amendment as requested by the submitter.

(b) **Recommended decision**

Submitter	Submission	Recommendation
Anders Crofoot	25/9	Accept in part
Department of Conservation	31/3	Accept in part
Federated Farmers of New Zealand	35/28	Accept
Horticulture New Zealand	50/18	Accept in part

Submitter	Submission	Recommendation
Kapiti Coast District Council	56/18	Accept in part
John and Julie Martin	73/1	Accept
Pamela Joy Meekings-Stewart	81/1	Reject
Meridian Energy Limited	82/14	Accept
Mighty River Power	83/18	Accept
Porirua City Council	100/11	Accept
Tararua Tramping Club	114/12	Accept in part
TrustPower Limited	124/15	Accept in part
Wellington City Council	131/15	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend policy 3 and its explanation as follows:

Policy 3: ~~Discouraging development in areas of~~ Protecting high natural character in the coastal environment – district and regional plans

District and regional plans shall include policies, rules and/or methods ~~that discourage~~ to protect high natural character in the coastal environment ~~in~~ from inappropriate (a) ~~new~~ subdivision, and/or development; and/or use. (b) ~~inappropriate use; on land in the coastal environment with high natural character.~~ The degree of natural character should be assessed considering the following matters:

(a) The extent to which natural elements, patterns and processes occur, including:

(i) natural elements: the products of natural processes – such as landforms, water forms, vegetation and land cover;

(ii) natural processes: the ecological, climatic and geophysical processes that underlie the expression and character of the place, site or area;

(iii) natural patterns: the visual expression or spatial distribution of natural elements which are, or which appear to be, a product of natural processes; and/or

(iv) surroundings: the setting or context, such that the place, site or area contributes to an understanding of the natural history of the wider area.

(b) The nature and extent of modifications to the place, site or area, including, but not limited to:

(i) physical alterations by people to the landscape, its landforms, waterforms, vegetation, land cover and to the natural patterns associated with these elements;

(ii) the presence, location, scale and density of buildings and structures, including infrastructure, whether appearing to be interconnected or isolated, and the degree of intrusiveness of these structures on the natural character of the place;

(iii) the temporal character of the modification – such as, whether it is fleeting or temporary, transitory, transitional or a permanent alteration to the character of the place, site or area; and/or

(iv) any existing influences or pressures on the dynamic ecological and geophysical processes contributing to the presence and patterns of natural elements, such that these may change and the natural elements and/or patterns may become threatened over time.

Explanation

Although it is a matter of national importance to preserve the natural character of the coastal environment, the Resource Management Act does not preclude appropriate use and development in the coastal environment.

The *New Zealand Coastal Policy Statement* further establishes a requirement to define what form of subdivision, use, development or occupation would be appropriate in the coastal environment and where it would be appropriate. Policy 3 supports these requirements, along with policies 54 and 55, which promote a compact, well designed and sustainable regional form, and policy 34, which provides guidance on ways to preserve natural character.

Case law¹ has established that ‘natural character’ does not necessarily mean pristine or completely unmodified character. Natural character occurs on a continuum, from pristine to totally modified. Policy 3 gives particular emphasis to protecting areas of high natural character within this continuum. However, as most of the coastal environment has some element of natural character

¹ Harrison v Tasman District Council 1994 W42/93

and, conversely, some degree or element of modification, policy 34 requires that consideration is nevertheless given to preserving natural character in the whole coastal environment.

Policy 3 requires district or regional plans to discourage new subdivision and development, and inappropriate use in areas considered to have 'high' natural character. Councils must assess land in order to discourage new subdivision and development in these areas, and to determine what would be inappropriate use on this land, depending on the attributes associated with an area's high natural character.

The requirement to include provisions in plans to protect areas with high natural character does not necessarily require identification of specific areas in plans. However, when determining the appropriateness of activities in the coastal environment, defining the degree of natural character will necessarily form part of any assessment. The identification of historic heritage, indigenous ecosystems and landscape in other policies will provide information which could be used as part of the determination of natural character.

To provide guidance, the policy lists matters to be considered when assessing natural character. Policy 3 (a) contains factors which contribute 'natural' attributes to an area, while the factors within clause (b) are about people's influence in or upon the area. In determining the degree of natural character, the factors within clauses (a) and (b) must be weighed against each other.

When making a determination as to whether the degree of natural character is high in a particular location, an area of high natural character is likely to be dominated by natural elements, patterns and processes rather than by the influence of human activities such as those listed in clause (b).

Policy 35 outlines the factors to be considered in making an assessment of the degree of natural character of a place, site or area in the coastal environment. When making a determination as to whether the degree of natural character is high in a particular location, in accordance with policy 3, the factors provided in policy 35 should be used.

Policy 35 will need to be considered alongside policy 3 when changing, varying or replacing a district or regional plan.

Policy 35 provides guidance on whether an activity is inappropriate in the coastal environment. Therefore, policy 35 will also need to be considered when changing, varying or replacing a district or regional plan under policy 3.

Related policies within this Regional Policy Statement direct regional and district plans to identify historic heritage places, sites and areas (policy 21) and identify and protect ecosystems with significant biodiversity value (policies 22 and 23), outstanding natural features and landscapes (policies 24 and 25), and significant amenity landscape values (policies 26 and 27) – using the criteria outlined in each policy, and guidance that will be developed to assist with implementation of the Regional Policy Statement (method 7).

Consequential amendments: Add policies 23, 25 and 27 to Table 2, Objective 4.

2.78 Policy 4: Identifying the landward extent of the coastal environment - district plans

Submitter	Submission	Summary
Anders Crofoot	25/10	Sought that farming be recognised as an existing and legitimate use of coastal land, to ensure that rules are not applied where they were not intended, such as to pasture as coastal vegetation.
F23/44	Federated Farmers of New Zealand	Support
Department of Conservation	31/4	Sought the following decision from the Council: The policy be retained with the proposed wording, but the explanation is amended to note that the Regional Council shall assist district councils in identifying the landward extent so that there is consistency across territorial boundaries.
F6/2	Hutt City Council	Support
Federated Farmers of New Zealand	35/29	Sought policy 4 be amended as follows: Identify in consultation with landholders, the community, tangata whenua and other key stakeholders, the landward extent of the coastal environment – district plans Also sought inclusion of reference to following recommendations in the Explanation section. "Federated Farmers of New Zealand recommends that: where there is a change in landscape category as a result of the reclassification or identification of the coastal environment, that those landowners be identified, contacted and informed of exactly what the proposed changes will mean to them prior to the notification of the plan change. That if requested these landowners are given an opportunity to discuss

Submitter	Submission	Summary
		landscape boundaries on their properties." And Sought consequential amendments as to detail or substance throughout the Policy Statement, in particular the methods section, to give effect to this Submission
F22/54	Anders Crofoot	Support
F24/43	Masterton District Council	Support
Horticulture New Zealand	50/19	Sought that policy 4 be amended in respect to identifying the landward extent of the coastal environment and place responsibility to the regional council.
F22/55	Anders Crofoot	Support
F224/56	Masterton District Council	Support
Horticulture New Zealand	50/20	Sought that policy 4 be amended to ensure that the provisions for identifying the coastal environment are through the Regional Plan, not district plans and based on principles in the Coastal Policy Statement.
Kapiti Coast District Council	56/19	Stated that further guidance on the implementation of the criteria would be useful, for example whether land which is likely to be affected by sea-level rise associated with climate change (in the next 20 – 50 years) is to be included within the coastal environment. Requested that Regional Council assist this process with resources for each District Council to undertake the work.
John and Julie Martin	73/2	Sought for those landscapes identified as being part of the landward extent of the coastal environment to be formally identified by way of survey and available to current and prospective landowners.
Mighty River Power	83/19	Sought retention in its entirety.
Porirua City Council	100/12	In order to assist Porirua City Council and other councils with completing such work, Porirua City Council urged Wellington Regional Council to quickly commence the regional landscape character description required by method 49.

Submitter	Submission	Summary
F12/11	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
New Zealand Historic Places Trust	87/14	Sought retention of policy 4
TrustPower Limited	124/16	Sought retention of the policy as proposed but with additional effect by amending method 49 as requested by the submitter.
Wellington City Council	131/74	Supported policy 4.

(a) Discussion

Anders Crofoot sought that farming be recognised as an existing and legitimate use of the coast, to ensure rules are not applied where they were not intended, such as regarding pasture as coastal vegetation. Federated Farmers of New Zealand further submitted in support of Mr Crofoot. Greater Wellington staff accept this submission point in part and amendments have been made in the introduction to the coastal environment (paragraph 6) to clarify that farming is a component of the coastal environment and of natural character. Greater Wellington staff note that the identification of the landward extent of the coastal environment could be used as a trigger for rules in a district plan.

Greater Wellington staff recommend rejecting the second part of the submission as pasture is not an identifying criterion of the coastal environment although it may exist in the coastal environment, as has been stated in the expression of issues. Though policy 43 requires the identification of an area, it does not direct its use or development.

The **Department of Conservation** suggested that the explanation of policy 4 be reworded to direct that Greater Wellington Regional Council assist district councils in identifying the landward extent to gain consistency across territorial boundaries. Greater Wellington staff recommend that this point be rejected as the primary responsibility for coordination between territorial authorities lies with those authorities. The Greater Wellington landscape classification project will to some extent provide guidance and information (method 49) and under method 7, Greater Wellington will provide any information held on

areas of high natural character in the coastal environment. Hutt City Council had further submitted in support of this submission.

Federated Farmers of New Zealand sought an amendment to the explanation in policy 4 stating that councils should “identify in consultation with landholders, the community, Tangata whenua and other key stakeholders, the landward extent of the coastal environment – district plans”. Federated Farmers of New Zealand also wanted the inclusion of a reference to Federated Farmers of New Zealand and they wanted landowners identified, contacted and informed of proposed changes to land classification, prior to notification of a plan change. They also sought that landowners be given an opportunity to discuss landscape boundaries on their properties and consequential amendments. Masterton District Council and Anders Crofoot further submitted in support of these submission points and pointed out that the landward extent of the coastal environment in the Wairarapa was identified through the Wairarapa Coastal Strategy process which included all stakeholders.

Staff recommend that these comments be accepted in part as it is anticipated that landholders, community, key stakeholders and tangata whenua would become involved in the consultation process as part of a district plan change, however this will be clarified in the explanation of policy 4. Direct reference to Federated Farmers of New Zealand is not warranted. Method 49 would also give some assistance to the identification of the landward extent of the coastal environment.

Horticulture New Zealand wanted policy 4 to be amended to place the responsibility of identifying the coastal environment on Greater Wellington Regional Council and Masterton District Council supported this position. Horticulture New Zealand also sought that provisions for identifying the coastal environment are in the regional coastal plan and based on New Zealand Coastal Policy Statement principles, rather than district plans. The submission of Horticulture New Zealand was supported by Anders Crofoot. Staff recommend rejecting this submission point as the responsibility lies with territorial authorities who have jurisdiction over the landward extent of the coastal environment whereas Greater Wellington Regional Council controls the coastal marine area below mean high water springs. Land-use issues are territorial authority responsibilities.

Kapiti Coast District Council sought guidance on the implementation of the criteria used to identify the landward extent, for example whether land affected by sea level rise should be included, and that Greater Wellington Regional Council provide resources. Greater Wellington staff recommend rejecting this point as there is recent guidance available from the Ministry for the Environment (Coastal hazards and Climate Change: Guidance Manual 2008) as to the extent of sea level rise to be included in planning provisions. Sea level rise in terms of land-use hazards is a district plan issue and is the responsibility of territorial authorities within their district plans.

Submitters **John and Julie Martin** sought that land identified as part of the coastal environment is formally identified by way of survey and available to current and prospective landowners. Greater Wellington staff recommend this point be accepted in part, as it is anticipated that there will be a consultation process before the coastal environment is identified in district plans. This point will be further clarified in the explanation section under policy 4.

Mighty River Power sought the retention of policy 4 in its entirety. Greater Wellington staff recommend that the committee note this point.

Porirua City Council sought that Greater Wellington Regional Council quickly commence the regional landscape character description required by method 49. Greater Wellington staff comment that Greater Wellington is already progressing this and recommend to the committee that this submission be accepted. Kiwi Income Property Trust, Kiwi Income Properties Ltd and Kiwi Properties Management Ltd further submitted in support of Porirua.

TrustPower Limited sought the retention of policy 4 as proposed, however, they also requested that method 49 be amended to include the identification of the extent of the coastal environment. Staff recommend that this point be rejected as the most appropriate scale for this identification is at the district level. Method 49 is intended to facilitate the more detailed identification and evaluation processes required of councils by the policies in the Regional Policy Statement.

Wellington City Council and **Historic Places Trust** supported policy 4. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Anders Crofoot	25/10	Accept in part
Department of Conservation	31/4	Reject
Federated Farmers of New Zealand	35/29	Accept in part
Horticulture New Zealand	50/19	Reject
Horticulture New Zealand	50/20	Reject
Kapiti Coast District Council	56/19	Reject
John and Julie Martin	73/2	Accept in part
Mighty River Power	83/19	Accept in part

Submitter	Submission	Recommendation
New Zealand Historic Places Trust	87/14	Accept in part
Porirua City Council	100/12	Accept
TrustPower Limited	124/16	Reject
Wellington City Council	131/74	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Insert the following last paragraph in the explanation.

Councils shall identify in consultation with landholders, the community, tangata whenua and other key stakeholders, the landward extent of the coastal environment.

2.79 Policy 5: Maintaining and enhancing coastal water quality for aquatic ecosystem health - regional plans

Submitter	Submission	Summary
Department of Conservation	31/5	Sought that the policy be retained with the proposed wording.
F23/45	Federated Farmers of New Zealand	Support
Federated Farmers of New Zealand	35/30	Sought that the Council clarify how the stated goal will be achieved and what this will mean for everyone in the catchment, this will be more consistent with integrated catchment management thinking
F22/56	Anders Crofoot	Support
Wellington City Council	131/16	Sought: <ol style="list-style-type: none"> 1. That the Regional Policy Statement include a definition of "healthy ecosystems" in the definitions section. 2. That policy 5 includes wording that states that regional plans will include clear guidance on standards and requirements for water quality and coastal environmental monitoring. 3. That method 2 includes clear reference to the regional plan including standards and requirements for water quality.

Submitter	Submission	Summary
F1/102	Winstone Aggregates	Oppose in part
F24/119	Masterton District Council	Oppose

(a) Discussion

The Department of Conservation sought that the policy be retained with the proposed wording. The submission was supported by Federated Farmers of New Zealand. Staff have recommended retaining the policy with amendments in response to other submissions.

Federated Farmers of New Zealand sought that the Council clarify how the stated goal will be achieved and what this will mean for everyone in the catchment. The submission was supported by Anders Crofoot. Policy 5 is a course of action rather than a goal. It will be implemented through method 2 and people affected will have the opportunity to become involved in implementation when the Regional Coastal Plan is reviewed.

Wellington City Council sought that the Regional Policy Statement includes a definition of “healthy ecosystems”. The reference in policy 5 to “healthy aquatic ecosystems” refers to the community structure and ecological function of water bodies that provide for natural processes that people value. This policy is directed at regional plan policies, rules, and/or methods and it will be appropriate in the development of these provisions to identify and define specific elements relating to aquatic ecosystem health. The submitter also sought that policy 5 states that regional plans will include clear guidance on standards and requirements for water quality and coastal environmental monitoring. Greater Wellington staff note that no specific direction on standards is given in the Regional Policy Statement but taking such an approach in regional plans can occur, particularly as the explanation to policy 11 states “Regional plans will establish management purposes for water bodies in the region and identify limits for water quality, flows and water levels, and/or aquatic habitat appropriate to the management purposes.” It is recommended that a similar statement is made in the explanation to policy 5 for coastal water. Minor changes are also made to policy 5 to ensure policies 5 and 11 both use consistent wording. The submission of Wellington City Council was opposed by Winstone Aggregates (in part) and Federated Farmers of New Zealand.

(b) Recommended decision

Submitter	Submission	Recommendation
Department of Conservation	31/5	Accept in part
Federated Farmers of New Zealand	35/30	Reject
Wellington City Council	131/16	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Change policy 5 and its explanation as follows:

Policy 5: Maintaining and enhancing coastal water quality for aquatic ecosystem health – regional plans

Regional plans shall include policies and rules to:

- (a) require, as a minimum, water quality in the coastal marine area to be managed for the purpose of maintaining or enhancing so that it sustains aquatic ecosystem healthy ecosystems; and
- (b) manage coastal water quality for other identified purposes.

Explanation

A high standard of water quality is an essential requirement for maintaining ~~the~~ healthy aquatic ecosystems in the *coastal marine area*.

This policy means that discharges, after reasonable mixing, cannot cause water quality to be unsuitable for sustaining healthy, functioning aquatic ecosystems. Regional plans will identify limits for coastal water quality for the maintenance and enhancement of aquatic ecosystem health.

Most contaminants and sediments that arrive in the coastal marine area are carried by *rivers*, streams and *stormwater* drains. Fresh water quality in rivers and streams is addressed in policies 11 and 13. Policy 15 promotes the discharge of contaminants to land and policy 14 seeks to minimise erosion and sediment runoff, prior to plan controls being established ~~in accordance with policy 16~~.

2.80 Policy 6: Recognising the benefits from regionally significant infrastructure and renewable energy – regional and district plans

Submitter	Submission	Summary
Agenda Development Planning	2/1	Requested amendment of policy 6(a)(i) to read 'People can travel to, from and around the region efficiently by a choice of modes including non-motorised and public transport.'
Airways Corporation of New Zealand Ltd	4/4	Sought that the policy be retained in current form without modification as they give protection to the Wellington International Airport and essential radio communication facilities.
F11/5	Paraparaumu Airport Limited	Support
Winstone Aggregates	15/24	<p>Sought that the definition of Regional Significant Infrastructure in policy 6 be amended as follows: Regionally significant infrastructure includes:</p> <ul style="list-style-type: none"> • pipelines for the distribution or transmission of natural or manufactured gas or petroleum • strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001 • strategic radio communications facilities, as defined in section 2(1) of the Radio Communications Act 1989 • the national electricity grid, as defined by the Electricity Governance Rules 2003 • facilities for the generation and transmission of electricity where it is supplied to the national electricity grid • the local authority water supply network and water treatment plants • the local authority wastewater and stormwater networks, systems and wastewater treatment plants • the Strategic Transport Network, as defined in the Wellington Regional Land Transport Strategy 2007-2016 • Wellington city bus terminal and Wellington Railway Station terminus • Wellington International Airport • Aggregate resources and quarries such as those found within the Western Hills of the Hutt Valley, within river systems, coastal sites and elsewhere throughout the region • Commercial Port Areas within Wellington Harbour (including Miramar, Burnham and

Submitter	Submission	Summary
		Seaview wharves) and adjoining land and storage tanks for bulk liquids.
CentrePort Wellington	23/6	Sought that policy 6(a) be amended to refer to 'goods' as well as 'people'.
Department of Conservation	31/6	Neutral submission, but noted that renewable energy sites (wind, tidal, wave and ocean current) may also have other significant or important values that require protection, which district and regional councils are required to identify and protect.
Genesis Energy	40/4	Sought that the policy be amended to read: '...the National Grid and electricity distribution and transmission networks defined as the system of transmission lines, subtransmission and distribution feeders (6.6kV and above) and all associated substations and other works to convey electricity...facilities for the generation and transmission of electricity where the electricity generated is supplied to the electricity transmission and distribution networks'
F5/8	PowerCo Limited	Support
F17/29	Meridian Energy Limited	Support
F26/4	Mighty River Power	Support
Linda Hoyle	51/2	Sought for policy 6 to be rewritten to take into account the government's energy policy, which centres on security of supply and affordable power generation. Submitter felt that statements regarding renewable energy's (i.e. wind generation) ability to meet these policies are incorrect and misleading to the general public and believed that Transpower New Zealand Limited should have been consulted to obtain more correct information.
F17/30	Meridian Energy Limited	Oppose
Kapiti Coast District Council	56/20	Stated that policy 6 could be strengthened by changing "recognising" to "enabling the development of" in the explanation to the policy. Also stated that it would be more accurate to say "energy generated from renewable sources" rather than "energy generated from renewable energy"

Submitter	Submission	Summary
Masterton District Council	74/7	Sought that a new policy be introduced for the recognition and protection of territorial government strategic assets as listed in their Long Term Council Community Plans, or that they are incorporated into the existing policy.
Meridian Energy Limited	82/15	Sought that the policy be amended to read: 'District and regional plans shall include policies and rules that recognise:... (c) the operational and technical constraints affecting the location of renewable energy development activities and regionally significant infrastructure which derive from the reliance of those activities on natural and physical resources or conditions that exist only limited areas of the region' and consequential amendments to the explanation.
F16/8	Genesis Energy	Support
F26/15	Mighty River Power	Support
Mighty River Power	83/20	Sought retention in its entirety.
F25/9	New Zealand Defence Force	Support
New Zealand Defence Force	86/6	Supported intent of policy 6. However sought addition of 'New Zealand Defence Force infrastructure' to the list of regionally significant infrastructure as identified in the explanation.
NZ Transport Agency	91/8	Supported but requested amendment to policy 6(a)(i) to read 'people and freight can travel to, from and around the region efficiently and safely' Sought amendment to the explanation to explicitly recognise the economic growth and productivity benefits of maintaining and improving SH1, and the linkage between policy 6(a)(i) and the WRLTS.
F13/28	Wellington International Airport Limited	Support
NZ Transport Agency	91/9	Sought amendment or alternatively a new policy to read: 'District and regional plans shall include policies that: recognise that the construction, operation, and maintenance of regionally significant infrastructure

Submitter	Submission	Summary
		may affect the environment (including aspects of the environment highlighted for protection in this statement); and allow for such effects, provided they are remedied or mitigated to the extent practicable.'
F1/82	Winstone Aggregates	Support
F13/29	Wellington International Airport Limited	Support
F17/31	Meridian Energy Limited	Oppose
F25/10	New Zealand Defence Force	Support
NZ Transport Agency	91/10	Requested amendment of the definition of regionally significant infrastructure to read: 'Regionally significant infrastructure includes existing and proposed:' and consequent amendments of the definition in policies 7 and 38 and the Definition.
F4/3	Transpower New Zealand Limited	Support in part
F5/10	PowerCo Limited	Support
F7/2	Oil Companies	Support in part
F17/32	Meridian Energy Limited	Support in part
Oil Companies	92/6	Sought retention of policy 6 insofar as it is an inclusive policy that recognises the regional and wider benefits of regionally significant infrastructure, and requires district and regional council to include policy provisions to give effect to this.
F25/11	New Zealand Defence Force	Support
Oil Companies	92/7	Sought that policy 6 be amended to include the use of methods, including rules, in addition to policies by making amendments to the following effect: Policy 6: Recognising the benefits from regionally

Submitter	Submission	Summary
		<p>significant infrastructure and renewable energy – regional and district plans.</p> <p>District and regional plans shall include policies and methods, including rules, that recognise:</p> <p>(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure including:</p> <ul style="list-style-type: none"> (i) people can travel to, from and around the region efficiently; (ii) public health and safety is maintained through the provision of essential services, supply of potable water and the collection and transfer of sewage; (iii) people have access to energy so as to meet their needs; and (iv) people have access to telecommunication services. <p>(b) the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</p> <ul style="list-style-type: none"> (i) security of supply and diversification of our energy sources; (ii) reducing dependency on imported energy resources; and (iii) reducing greenhouse gas emissions.
Oil Companies	92/8	Sought the deletion of the full text of the definition of regionally significant infrastructure from the explanations to policy 6, 7 and 38. Stated that if necessary simply cross-reference to the definitions section of the Regional Policy Statement.
F26/22	Mighty River Power	Support
Porirua City Council	100/13	Supported. But sought that the title be amended as follows: Recognising the benefits from renewable energy and regionally significant infrastructure.
F12/12	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support

Submitter	Submission	Summary
Porirua City Council	100/14	Noted the sentence: Imported energy resources include as oil, natural gas and coal in the explanation to policy 6 contains an error and the word 'as' should be deleted.
F12/13	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
Preserve Pauatahanui Incorporated	101/3	Requested all sections of policy 6 that refer to renewable energy generation be deleted.
F8/18	TrustPower Limited	Oppose
F17/33	Meridian Energy Limited	Oppose
South Wairarapa District Council	112/19	(a)(iv) "access to telecommunication services" — sought 'where available' be added. Also noted that the description "imported energy sources" is perhaps incorrect because much of the natural gas and coal used comes from New Zealand. Suggested "carbon based energy source" as a more accurate description.
The Energy Efficiency and Conservation Authority	117/12	Sought the following amendments to policy 6: "Policy 6: Recognising and promoting the benefits from regionally and nationally significant infrastructure and renewable energy – regional and district plans District and regional plans shall include policies that recognise and promote: (a) the social, economic, cultural and environmental benefits of regionally and nationally significant infrastructure ..." "(b) the regional and national social, economic, cultural and environmental benefits to be derived from the generation and transmission of energy from renewable energy resources including: (i) security of supply and diversification of our energy sources; (ii) reducing dependency on imported and

Submitter	Submission	Summary
		<p>non-renewable energy resources;</p> <p>(iii) reducing greenhouse gas emissions; and</p> <p>(iv) reducing dependency on the national grid and reducing transmission losses.</p> <p>(c) the nationally significant wind and marine energy resources within the region and the need for electricity generation facilities to locate where these resources exist.</p> <p>Explanation</p> <p>Energy generated from renewable energy and regionally and nationally significant infrastructure can provide benefits both within and outside the region. Renewable energy benefits are not only generated by large scale renewable energy projects but also smaller scale projects.</p> <p>Renewable energy means energy produced from solar, wind, hydro, geothermal, biomass, tidal, wave and ocean current sources. There is significant potential for the development of renewable energy resources in the Wellington region.</p> <p>Imported energy resources include non-renewable resources such as oil, natural gas and coal.</p> <p>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) including the 90% renewable electricity target by 2025 and the Proposed National Policy Statement on Renewable Electricity will also need to be given regard.</p> <p>Regionally and nationally significant infrastructure includes:</p> <ul style="list-style-type: none"> • facilities for the generation and transmission of electricity where it is supplied to the local distribution network or the national electricity grid."
F8/19	TrustPower Limited	Support
F17/34	Meridian Energy Limited	Support in part
F26/25	Mighty River Power	Support

Submitter	Submission	Summary
F25/12	New Zealand Defence Force	Support in part
Transpower New Zealand Limited	123/15	Sought policy 6 be amended to remove the full definition of regionally significant infrastructure from the explanation text. If necessary, include an appropriate cross-reference to the definition.
F5/16	PowerCo Limited	Support
Transpower New Zealand Limited	123/19	Sought A: Retain policy 6 insofar as it is an inclusive policy that recognises the regional and wider benefits of people having access to energy so as to meet their needs, and requires district and regional council to include policy provisions to give effect to this. B: Amend policy 6 to include the use of methods, including rules, in addition to policies.
F5/19	PowerCo Limited	Support in part
TrustPower Limited	124/17	Sought that the policy be amended to read: 'Recognising and providing for the national benefits of regionally significant infrastructure and renewable energy development District and regional plans shall include policies that recognises and provide for:...
		(b) that renewable electricity energy generation is a key issue for New Zealand and there are the social, economic, cultural and environmental benefits from any scale of energy generated from renewable energy resources. Recognised benefits include: ... (ii) reducing dependency on imported energy resources and the national grid; (iv) efficient use of natural resources; (v) reduction in transmission losses; (vi) reliability; (vii) development benefits and (viii) contribution to the renewable energy target. Sought retention of the definition of regionally significant infrastructure in relation to "facilities for the generation and transmission of electricity where it is supplied to the national electricity grid" as stated in the explanatory text.

Submitter	Submission	Summary
F17/35	Meridian Energy Limited	Support in part
F24/108	Masterton District Council	Oppose
F26/36	Mighty River Power	Support
F25/13	New Zealand Defence Force	Support in part
TrustPower Limited	124/18	<p>Stated that as an alternative to the amendments requested for policies 6 and 10, the insertion of a new policy to read:</p> <p>'Recognising and providing for the benefits of renewable energy generation development and use – regional and district plans</p> <p>District and regional plans shall recognise that renewable electricity energy generation is a key issue for New Zealand and therefore shall include policies that recognise and provide for the social, economic, cultural and environmental benefits at any scale of energy generated from renewable energy resources. Recognised benefits include:</p> <ul style="list-style-type: none"> (i) security of supply and diversification of our energy sources; (ii) reducing dependency on imported energy resources and the national grid; (iii) reducing greenhouse gas emissions; (iv) efficient use of natural resources; (v) reduction in transmission losses; (vi) reliability; (vii) development benefits; and contribution to the renewable energy target. <p>Explanation: Climate change and renewable electricity generation are key issues for the Region. New Zealand has a target of providing 90% of our energy use by renewable sources by 2025. Policy xxx seeks to ensure that planners and decision-makers actively take into account the recognised national benefits of renewable energy generation consistent with the proposed National Policy Statement on Renewable Energy Generation.</p>
F24/110	Masterton District Council	Support

Submitter	Submission	Summary
Wellington International Airport Limited	134/6	Supported
F11/13	Paraparaumu Airport Limited	Support
F124/36	Mighty River Power	Support
F25/14	New Zealand Defence Force	Support
Wellington City Council	131/75	Supported policy 6.
Westfield New Zealand Limited	138/20	Supported policy 6

(a) Discussion

Agenda Development Planning requested amendment of policy 6(a)(i) to read ‘people can travel to, from and around the region efficiently by a choice of modes including non-motorised and public transport.’ Greater Wellington staff consider that modes of transport are more appropriately considered at a local planning level where they decide what modes are appropriate in different locations and for different communities.

The **Airways Corporation of New Zealand Limited** sought that policy 6 be retained without modification. Paraparaumu Airport Limited supported the submission. Greater Wellington staff have recommended the retention of policy 6 with amendments in response to other submissions.

Winstone Aggregates sought an amendment to the definition of regional infrastructure to include ‘Aggregate resources and quarries such as those found within the Western Hills of the Hutt Valley, within river systems, coastal sites and elsewhere throughout the region’. Greater Wellington staff consider that aggregate resources are not infrastructure and their importance is recognised in the minerals section and in policy 60. To be considered regionally significant infrastructure the infrastructure needs to provide region-wide, public, and social or economic benefits, and staff consider the economic benefits from quarries to be largely private. The quarries in the region are not the sole source of aggregate for regionally

significant infrastructure, nor is regionally significant infrastructure the only use of aggregate from the region's quarries.

CentrePort Wellington sought that policy 6(a) refer to 'goods' as well as 'people'. Greater Wellington staff consider this addition appropriate.

The **Department of Conservation** noted that renewable energy sites may also have other significant or important values that require protection, which district and regional councils are required to identify and protect. Greater Wellington staff note the comments.

Genesis Energy sought that the definition of 'regionally significant infrastructure' in the explanation be amended to read (additions in underline, deletions in strikethrough) '...the National electricity Grid and electricity distribution and transmission networks defined as the system of transmission lines, subtransmission and distribution feeders (6.6kV and above) and all associated substations and other works to convey electricity, as defined by the Electricity Governance Rules 2003...facilities for the generation and transmission of electricity where the electricity generated is supplied to the national electricity transmission and distribution networks grid'. PowerCo Limited, Meridian Energy Limited, and Mighty River Power supported the submission. Greater Wellington staff have recommended amending 'national electricity grid' to 'electricity transmission network' as defined in the Electricity Governance Rules 2003 where referring to facilities for generation and transmission, as this includes facilities for local networks and the national grid. Staff recommend retaining the reference to the definition of national grid in the Electricity Governance Rules as this includes all the infrastructure in the wording requested by the submitter, so change is unnecessary. Staff note the definition is recommended to be removed from the explanation but is included in appendix 3 definitions. See the report on definitions for recommended changes.

Linda Hoyle sought that policy 6 be rewritten to take into account the government's energy policy. Meridian Energy Limited opposed the submission. Greater Wellington staff consider the content to be consistent with the requirements of the Act and the content of the government's energy policy.

Kapiti Coast District Council requested changing the term 'recognising' to 'enabling the development of', and also requested amending the explanation to read 'energy generated from renewable energy sources'. Greater Wellington staff agree that the explanation should be amended but that it should be consistent with the wording of Policy 6(b) "renewable energy resources". Staff do not consider it possible to 'enable the development of' benefits, and also consider 'recognising' as appropriate.

Masterton District Council requested the inclusion of a new policy to recognise and protect territorial government strategic assets listed in Long Term Community Council Plans or inclusion of these assets in policy 6. Greater Wellington staff note that local authority water supply networks, water treatment plants, wastewater and stormwater networks, systems, and plants, utility networks, and the Strategic Transport Network are already included in the definition of regionally significant infrastructure and are therefore already recognised and protected by policies 6 and 7 respectively. Staff have recommended the inclusion of Hood Aerodrome. The remainder of the assets listed in the Masterton District Council Long Term Community Council Plan do not provide economic or social benefits or essential social services for the region as a whole, so are not regionally significant infrastructure.

Meridian Energy Limited sought an addition to policy 6 to read '(c) the operational and technical constraints affecting the location of renewable energy development activities and regionally significant infrastructure which derive from the reliance of those activities on natural and physical resources or conditions that exist in only limited areas of the region'. Genesis Energy and Mighty River Power supported the submission. Greater Wellington staff note the need to locate renewable energy generation infrastructure near where the resource exists is recognised in policy 38, as a consideration for resource consent applications and changes or variations to district or regional plans, and consider this a more appropriate place for such consideration.

Mighty River Power sought retention of policy 6 in its entirety. The New Zealand Defence Force supported the submission. Greater Wellington staff have recommended retention of the policy with amendments in response to other submissions.

The **New Zealand Defence Force** supported the intent of policy 6 and requested the addition of New Zealand Defence Force infrastructure to the list of regionally significant infrastructure. Greater Wellington staff agree that defence force infrastructure should be included and recommend adding it to the definition. See the report on definitions for details on the changes. Staff note the recommendation to remove the definition from the explanation of policy 6 as it is in the list of definitions.

The **NZ Transport Agency** supported policy 6, requested an amendment to policy 6(a)(i) to read 'people and freight can travel to, from and around the region efficiently and safely', and sought amendment to the explanation to recognise the economic growth and productivity benefits of maintaining and improving State Highway 1, and the linkage between policy 6(a)(i) and the Wellington Regional Land Transport Strategy. Wellington International Airport Limited supported the submission. Greater Wellington staff agree with the amendment to policy 6(a)(i) but have recommended the use of 'goods'

as requested by CentrePort Wellington as a more appropriate term. The general statements relating to all regionally significant infrastructure are more appropriate for the Regional Policy Statement than specific reference to State Highway 1. The definition of 'regionally significant infrastructure' includes reference to the Regional Land Transport Strategy list of the 'Strategic Transport Network' so there is no need to provide an additional link to policy 6(a)(ii).

The NZ Transport Agency requested amendment to policy 6 or alternatively a new policy to recognise the potential for adverse effects from regionally significant infrastructure and allow for these effects provided they are remedied or mitigated. Winstone Aggregates, Wellington International Airport Limited, and the New Zealand Defence Force supported the submission. Meridian Energy Limited opposed the submission. Greater Wellington staff note the requirement in Part II of the Act to consider adverse effects of activities, and note this occurs at the planning and consenting stage. No change is considered necessary.

The NZ Transport Agency requested an amendment to the definition of regionally significant infrastructure to refer to 'existing and proposed' infrastructure. PowerCo supported the submission. Transpower New Zealand Limited and the Oil Companies supported the submission in part but considered the amendment unnecessary as it is already implicit in the current definition. Meridian Energy supported the submission in part but considered only proposed infrastructure that has a resource consent or designation should be included. Greater Wellington staff consider it inappropriate to protect projects planned by organisations that have not gained resource consents, as the costs, benefits, and impacts need to be considered as part of the consent process. The definition as written does not exclude projects that have gained consent or received a designation but not yet been built.

The **Oil Companies** sought retention of policy 6 insofar as the intent recognises the benefits of regionally significant infrastructure and requires regional and district councils to give effect to this. The New Zealand Defence Force supported the submission. Greater Wellington staff note the support.

The Oil Companies sought that policy 6 be amended to read 'District and regional plans shall include policies and methods, including rules, that recognise...'. Greater Wellington staff consider that policies are the best mechanism to recognise benefits, so do not consider a change is necessary.

The Oil Companies sought the deletion of the full text of the definition of regionally significant infrastructure from policies 6, 7, and 38. Mighty River Power supported the submission. Greater Wellington staff consider this request appropriate.

Porirua City Council supported policy 6 but requested the title be amended to place ‘renewable energy’ before ‘regionally significant infrastructure’. Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd supported the submission. Greater Wellington staff agree that this makes it clearer that renewable energy does not refer solely to regionally significant renewable energy. Staff also recommend a consequential change to policy 38. See recommended changes to policy 38.

Porirua City Council noted an error in the sentence ‘Imported energy resources include as oil, natural gas and coal’ and requested the word ‘as’ be deleted. Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd supported the submission. Greater Wellington staff consider the request appropriate.

Preserve Pauatahanui Incorporated requested all references to renewable energy generation in policy 6 be deleted. TrustPower Limited and Meridian Energy Limited opposed the submission. Greater Wellington staff consider that renewable energy generation will impact the region so it is appropriate to reference in the Regional Policy Statement.

South Wairarapa District Council requested policy 6(a)(iv) be amended as underlined to read ‘people have access to telecommunication services where available’. The submitter also requested a more accurate description for imported energy sources and requested amendment to read ‘~~imported~~ carbon-based energy sources’. Greater Wellington staff consider that to only recognise the benefit of telecommunication services to those that have the service available does not fully recognise the potential benefits of telecommunication services infrastructure. Staff agree that a more accurate description of non-renewable energy sources is needed and recommend adding the term ‘non-renewable’ in response to the submission from the Energy Efficiency and Conservation Authority.

The **Energy Efficiency and Conservation Authority** requested policy 6 be amended to refer to nationally significant infrastructure, the need to locate energy generation facilities near where the resources exist, and providing energy to the local distribution network. TrustPower Limited and Mighty River Power supported the submission. Meridian Energy Limited supported the submission but opposed including reference to policy documents that are not finalised. The New Zealand Defence Force supported the general intent of the submission. Greater Wellington staff note that there is no finalised list of nationally significant infrastructure available to refer to, and consider the council is concerned with regional matters and addresses regional issues so referring to regionally significant infrastructure is appropriate. The need for generation facilities to locate near the resources is recognised elsewhere in the Regional Policy Statement (policy 38), and is not part of the benefits which are the subject of policy 6. The benefits of reducing dependency on the

national grid and reducing transmission losses are recognised in policy 6(b)(i). Staff agree with the need for amendment of the paragraph relating to imported energy resources and recommend inserting 'non-renewable' into policy 6(b)(ii) and the explanation.

Transpower New Zealand Limited sought the removal of the definition of regionally significant infrastructure from policy 6. PowerCo Limited supported the submission. Greater Wellington staff consider this request appropriate.

Transpower New Zealand Limited sought retention of policy 6 insofar as the intent recognises the benefits of regionally significant infrastructure and requires regional and district councils to give effect to this. The submitter also sought that policy 6 be amended to read 'District and regional plans shall include policies and methods, including rules, that recognise...' PowerCo Limited supported the submission in part. Greater Wellington staff note the support. Staff consider that policies are the best mechanism for recognising benefits, so do not consider any change necessary.

TrustPower Limited requested policy 6 be amended to read (additions in underline, deletions in strikethrough):

'Recognising and providing for the national benefits of ~~from~~ regionally significant infrastructure and renewable energy development: District and regional plans shall include policies that recognise and provide for...

(b) that renewable electricity energy generation is a key issue for New Zealand and there are the social, economic, cultural and environmental benefits from any scale of energy generated from renewable energy resources. Recognised benefits includeing...

(ii) reducing dependency on imported energy resources and the national grid...

(iv) efficient use of natural resources;

(v) reduction in transmission losses;

(vi) reliability;

(vii) development benefits; and

(viii) contribution to the energy target.'

The submitter also requested the retention of the definition of regionally significant infrastructure in relation to facilities for the generation and transmission of electricity where it is supplied to the national electricity grid. Meridian Energy Limited and the New Zealand Defence Force supported the submission in part. Masterton District Council opposed the submission and Mighty River Power

supported the submission. Alternatively the submitter requested an additional policy be inserted. Masterton District Council supported this submission. Greater Wellington staff consider the regional council's role to relate to regional issues, so it is therefore appropriate to recognise regional benefits. The requested additional benefits are addressed by the broader benefits already listed. Staff have recommended that the definition of regionally significant infrastructure remain in the Regional Policy Statement with some amendments, although it is recommended to remove the full definition from the explanation, as it is contained in the list of definitions. See the report on definitions for recommended changes.

Wellington International Airport Limited supported policy 6. Paraparaumu Airport Limited, Mighty River Power, and the New Zealand Defence Force supported the submission. Greater Wellington staff note the support.

Wellington City Council and Westfield New Zealand Limited supported policy 6. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Agenda Development Planning	2/1	Reject
Airways Corporation of New Zealand Ltd	4/4	Accept in part
Winstone Aggregates	15/24	Reject
CentrePort Wellington	23/6	Accept
Department of Conservation	31/6	Noted
Genesis Energy	40/4	Accept in part
Linda Hoyle	51/2	Reject
Kapiti Coast District Council	56/20	Accept in part
Masterton District Council	74/7	Accept in part
Meridian Energy Limited	82/15	Reject
Mighty River Power	83/20	Accept in part
New Zealand Defence Force	86/6	Accept
NZ Transport Agency	91/8	Accept in part
NZ Transport Agency	91/9	Reject

Submitter	Submission	Recommendation
NZ Transport Agency	91/10	Reject
Oil Companies	92/6	Accept
Oil Companies	92/7	Reject
Oil Companies	92/8	Accept
Porirua City Council	100/13	Accept
Porirua City Council	100/14	Accept
Preserve Pauatahanui Incorporated	101/3	Reject
South Wairarapa District Council	112/19	Accept in part
The Energy Efficiency and Conservation Authority	117/12	Accept in part
Transpower New Zealand Limited	123/15	Accept
Transpower New Zealand Limited	123/19	Accept in part
TrustPower Limited	124/17	Accept in part
TrustPower Limited	124/18	Reject
Wellington International Airport Limited	134/6	Accept
Wellington City Council	131/75	Accept in part
Westfield New Zealand Limited	138/20	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Make the following amendment to policy 6 and its explanation:

Policy 6: Recognising the benefits from regionally significant infrastructure and renewable energy and regionally significant infrastructure – regional and district plans

District and regional plans shall include policies 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;
 - (ii) public health and safety is maintained through the provision of essential services, supply of potable water and the collection and transfer of sewage;
 - (iii) people have access to energy so as to meet their needs; and
 - (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 and non-renewable energy resources; and
 - (iii) reducing greenhouse gas emissions.

Explanation

Energy generated from *renewable energy resources* and regionally significant *infrastructure* can provide benefits both within and outside the region. Renewable energy benefits are not only generated by large scale renewable energy projects but also smaller scale projects.

...Imported and non-renewable energy resources include as oil, gas, natural gas and coal. ...

Regionally significant infrastructure is defined in Appendix 3.
includes:

- ~~• pipelines for the distribution or transmission of natural or manufactured gas or petroleum~~
- ~~• strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001~~
- ~~• strategic radio communications facilities, as defined in section 2(1) of the Radio Communications Act 1989~~
- ~~• the national electricity grid, as defined by the Electricity Governance Rules 2003~~

- ~~facilities for the generation and transmission of electricity where it is supplied to the national electricity grid~~
- ~~the local authority water supply network and water treatment plants~~
- ~~the local authority wastewater and stormwater networks, systems and wastewater treatment plants~~
- ~~the Strategic Transport Network, as defined in the Wellington Regional Land Transport Strategy 2007-2016~~
- ~~Wellington city bus terminal and Wellington Railway Station terminus~~
- ~~Wellington International Airport~~
- ~~Commercial Port Areas within Wellington Harbour (including Miramar, Burnham and Seaview wharves) and adjoining land and storage tanks for bulk liquids.~~

Essential services include potable water, ~~and~~ the collection and transfer of sewage and stormwater, and emergency services.

2.81 Policy 7: Protecting regionally significant infrastructure - regional and district plans

Submitter	Submission	Summary
Agenda Development Planning	2/2	Requested amendment to read: 'Protect existing and planned regionally significant infrastructure'.
F4/5	Transpower New Zealand Limited	Support
F5/21	PowerCo Limited	Support
F7/4	Oil Companies	Support
F13/30	Wellington International Airport Limited	Support
F20/1	Westfield New Zealand Ltd	Support

Submitter	Submission	Summary
Airways Corporation of New Zealand Ltd	4/5	Sought that the policy be retained in current form without modification as they give protection to the Wellington International Airport and essential radio communication facilities.
F11/6	Paraparaumu Airport Limited	Support
Winstone Aggregates	15/25	<p>Sought that the definition of regionally significant infrastructure in policy 7 be amended as follows: Regionally significant infrastructure includes:</p> <ul style="list-style-type: none"> • pipelines for the distribution or transmission of natural or manufactured gas or petroleum • strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001 • strategic radio communications facilities, as defined in section 2(1) of the RadioCommunications Act 1989 • the national electricity grid, as defined by the Electricity Governance Rules 2003 facilities for the generation and transmission of electricity where it is supplied to the national electricity grid • the local authority water supply network and water treatment plants the local authority wastewater and stormwater networks, systems and wastewater treatment plants • the Strategic Transport Network, as defined in the Wellington Regional Land Transport Strategy 2007-2016 • Wellington city bus terminal and Wellington Railway Station terminus • Wellington International Airport • Aggregate resources and quarries such as those found within the Western Hills of the Hutt Valley, within river systems, coastal sites and elsewhere throughout the region • Commercial Port Areas within Wellington Harbour (including Miramar, Burnham and Seaview wharves) and adjoining land and storage tanks for bulk liquids.
Genesis Energy	40/5	Sought that the policy be amended to read: “...the National Grid and electricity distribution and transmission networks defined as the system of transmission lines, subtransmission and distribution feeders (6.6kV and above) and all associated substations and other works to convey

Submitter	Submission	Summary
		electricity... facilities for the generation and transmission of electricity where the electricity generated is supplied to the electricity transmission and distribution networks'
F5/6	PowerCo Limited	Support
F26/5	Mighty River Power	Support
Meridian Energy Limited	82/16	Sought that the policy be amended to read: 'District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible subdivision, use and development occurring under, over or alongside the infrastructure' and consequential amendments to the explanation. Also sought amendments to the 4th and 5th bullet points of the explanation to read 'the electricity transmission network (as defined by the National Policy Statement on Electricity Transmission 2008); facilities for the generation and transmission of electricity where that electricity is supplied to the electricity transmission network (as defined by the National Policy Statement on Electricity Transmission 2008)'. Further amendments were also sought to the last paragraph of the explanation to reflect the amendment to National Policy Statement terminology and paragraph 3 of the explanation to read 'Incompatible subdivisions, land uses or activities are those which adversely affect the efficient operation of infrastructure or its ability to give full effect to any consent or other authorisation or restrict its ability to be maintained...'
F13/31	Wellington International Airport Limited	Support
F26/16	Mighty River Power	Support
Mighty River Power	83/21	Sought retention in its entirety.
New Zealand Defence Force	86/7	Supported intent of policy 7. However sought addition of 'New Zealand Defence Force infrastructure' to the list of regionally significant infrastructure as identified in the explanation.

Submitter	Submission	Summary
NZ Transport Agency	91/11	Supported references to incompatible land uses and development. Requested amendment to the cross referencing beside the policy so it referred to objective 21. Requested that the explanation be amended to include incompatible land use activities that are located 'near' infrastructure.
F3/2	Vector	Support
F13/32	Wellington International Airport Limited	Support
F25/16	New Zealand Defence Force	Support
NZ Transport Agency	91/12	Requested amendment of the fourth paragraph to read: '...any effects that may be associated with that infrastructure and to include policies and rules that enable the effects of such activities on regionally significant infrastructure to be robustly assessed.' Requested an addition to the last paragraph of the explanation to read: 'Similarly, consultation should occur with all operators of regionally significant infrastructure.'
F3/3	Vector	Support in part
F13/33	Wellington International Airport Limited	Support
F25/17	New Zealand Defence Force	Support
Oil Companies	92/9	Sought amendments to the text in paragraphs 3 and 4 of the explanation to policy 7 to appropriately identify that regionally significant infrastructure needs to be protected from land uses and activities that not only adversely affect their efficient operation and ability to be maintained, but also that affect their ability to be upgraded, and to replace the text 'alongside' with the text 'adjacent'. Stated that this could be achieved by making amendments to the following effect: Policy 7: Protecting regionally significant infrastructure – regional and district plans District and regional plans shall include policies and

Submitter	Submission	Summary
		<p>rules that protect regionally significant infrastructure from incompatible new land uses or activities under, over, or adjacent.</p> <p>Explanation Incompatible land uses or activities are those which adversely affect the efficient operation of infrastructure and/or restrict its ability to be maintained and upgraded. It may also include new land uses that are sensitive to activities associated with infrastructure.</p> <p>Protecting regionally significant infrastructure does not mean that all land uses or activities under, over, or adjacent are prevented. The Wellington Regional Council and city and district councils will need to ensure that activities provided for in a district or regional plan are compatible with the efficient operation, maintenance and upgrading of the infrastructure and any effects that may be associated with that infrastructure.</p>
F25/18	New Zealand Defence Force	Support
Oil Companies	92/10	Sought deletion of the full text of the definition of regionally significant infrastructure from the explanations to policy 6, 7 and 38. Stated that if necessary simply cross-reference to the definitions section of the Regional Policy Statement.
The Energy Efficiency and Conservation Authority	117/13	<p>Sought the following amendments to policy 7: “Policy 7: Protecting regionally and nationally significant infrastructure – regional and district plans District and regional plans shall include policies and rules that protect regionally and nationally significant infrastructure from incompatible new land uses or activities under, over, or alongside.</p> <p>Explanation Regionally and nationally significant infrastructure is an important physical resource that enables people and communities to provide for their social, economic and cultural wellbeing, and their health and safety. Regionally and nationally significant infrastructure includes:</p> <ul style="list-style-type: none"> • facilities for the generation and transmission of electricity where it is supplied to the local distribution network or the national electricity grid.”

Submitter	Submission	Summary
F25/19	New Zealand Defence Force	Support
F26/26	Mighty River Power	Support
Transpower New Zealand Limited	123/16	Sought policy 7 be amended to remove the full definition of regionally significant infrastructure from the explanation text. If necessary, include an appropriate cross-reference to the definition.
F5/17	PowerCo Limited	Support
Transpower New Zealand Limited	123/20	Sought: A. Amend the regionally significant resource management issue for Infrastructure (Section 3.3) as outlined in section 4 of this submission. B. Amend policy 7 to appropriately identify that regionally significant infrastructure needs to be protected from land uses and activities that not only adversely affect their efficient operation and ability to be maintained, but also that effect their ability to be upgraded.
F1/90	Winstone Aggregates	Support
F5/20	PowerCo Limited	Support
F13/34	Wellington International Airport Limited	Support
F25/20	New Zealand Defence Force	Support point B
TrustPower Limited	124/19	Sought policy to be amended to read: 'District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible new land uses or activities under, over, alongside or in close proximity.'
F3/5	Vector	Support in part
F13/35	Wellington International Airport Limited	Oppose

Submitter	Submission	Summary
F20/39	Westfield New Zealand Ltd	Support
F24/109	Masterton District Council	Oppose
F25/21	New Zealand Defence Force	Support
F26/35	Mighty River Power	Support
Vector	126/2	<p>Sought the addition of wording to policy 7: Protecting regionally significant infrastructure - regional and district plans of the Proposed Regional Policy Statement to read:</p> <p>"The owners or operators of regionally significant infrastructure shall be consulted with when such infrastructure is affected by any proposed potentially incompatible land use or activity."</p> <p>Also sought that the explanation associated with policy 7: Protecting regionally significant infrastructure - regional and district plans of the Proposed Regional Policy Statement be amended to read:</p> <p>"Incompatible land uses or activities are those which adversely effect the efficient operation of infrastructure or restrict its ability to be maintained or sufficiently protected ...</p> <p>... The Wellington Regional Council and city and district councils will need to ensure that activities provided for in a district or regional plan are compatible with the efficient operation, maintenance and protection requirements of the infrastructure and any effects that may be associated with that infrastructure."</p>
F5/22	PowerCo Limited	Support
F7/5	Oil Companies	Support
F13/36	Wellington International Airport Limited	Support

Submitter	Submission	Summary
F25/22	New Zealand Defence Force	Support
F26/1	Mighty River Power	Support
Wellington City Council	131/76	Supported policy 7.
Wellington International Airport Limited	134/7	Supported
F11/14	Paraparaumu Airport Limited	Support
Westfield New Zealand Limited	138/21	Supported policy 7

(a) Discussion

Agenda Development Planning requested that policy 7 be amended to read ‘protect existing and planned regionally significant infrastructure’. Transpower New Zealand Limited, PowerCo Limited, the Oil Companies, Wellington International Airport Limited, and Westfield New Zealand Limited supported the submission. Greater Wellington staff consider it is inappropriate to protect regionally significant infrastructure projects that may be planned by organisations that have not gained resource consents, as the costs, benefits, and impacts of the project would need to be weighed as part of the consenting process. Regionally significant infrastructure that has gained consent approval but not been built is not excluded from the policy.

Airways Corporation of New Zealand Limited sought retention of policy 7 without modification. Paraparaumu Airport Limited supported the submission. Greater Wellington staff have recommended the retention of policy 7 with some amendments in response to other submissions.

Winstone Aggregates requested the definition of regionally significant infrastructure be amended to include ‘Aggregate resources and quarries such as those found within the Western Hills of the Hutt Valley, within river systems, coastal sites and elsewhere throughout the region’. Greater Wellington staff consider that aggregate resources are not infrastructure and their importance is recognised in the minerals section and elsewhere in policy 60. To be considered

regionally significant infrastructure the infrastructure needs to provide social or economic, region-wide, public benefits, and staff consider the economic benefits from quarries to be largely private. The quarries in the region are not the sole source of aggregate for regionally significant infrastructure, nor is this the only use of aggregate from the region's quarries.

Genesis Energy sought that policy 7 be amended to read '...the National electricity Grid and electricity distribution and transmission networks defined as the system of transmission lines, subtransmission and distribution feeders (6.6kV and above) and all associated substations and other works to convey electricity, as defined by the Electricity Governance Rules 2003...facilities for the generation and transmission of electricity where the electricity generated is supplied to the national electricity transmission and distribution networks grid'. PowerCo Limited and Mighty River Power supported the policy. Greater Wellington staff have recommended 'national electricity grid' be amended to 'electricity transmission network' as defined in the Electricity Governance Rules 2003 where referenced in the facilities for generation and transmission, as this includes facilities for local networks and the national grid. Staff recommend retaining the definition of national grid from the Electricity Governance Rules 2003 as it includes the infrastructure listed in the wording requested by the submitter, so no change is necessary. Staff note the recommended deletion of the definition from the explanation, but the definition will be retained with amendments in appendix 3 definitions. See the report on definitions for the recommended changes.

Meridian Energy Limited requested policy 7 be amended to read 'District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible ~~new land uses or activities~~ subdivision, use and development occurring under, over or alongside the infrastructure.' The submitter also sought amendment of the electricity components of the definition of regionally significant infrastructure and the last paragraph of the explanation to refer to the National Policy Statement on Electricity Transmission 2008 and its associated terminology. The submitter also sought paragraph 3 of the explanation be amended to read 'Incompatible subdivisions, land uses or activities are those which adversely affect the efficient operation of infrastructure or its ability to give full effect to any consent or other authorisation or restrict its ability to be maintained...' Wellington International Airport Limited and Mighty River Power supported the submission. Greater Wellington staff have recommended that the definition be removed from the explanation. Staff have recommended amending 'national electricity grid' to 'electricity transmission network' as defined in the Electricity Governance Rules 2003 where this refers to facilities for generation and transmission, as this includes infrastructure for local networks and the national grid. Staff recommend retaining the definition of national grid from the Electricity Governance Rules 2003 as it includes all the infrastructure intended to be included in the

definition. See the report on definitions for the recommended changes.

Mighty River Power sought retention of policy 7 in its entirety. Greater Wellington staff note some changes have been recommended in response to other submissions.

The **New Zealand Defence Force** supported the intent of policy 7 but requested an addition of 'New Zealand Defence Force infrastructure' to the list of regionally significant infrastructure. Greater Wellington staff agree that Defence Force infrastructure provides essential social services and social benefits to the whole region, but note the recommended deletion of the full text of the definition from the explanation. A new bullet point is recommended for inclusion in the definition. See the report on definitions for the recommended changes.

The **NZ Transport Agency** supported references to incompatible land uses and development, requested amendment to the cross referencing to include objective 21, and requested the explanation be amended to include incompatible land use activities that are located 'near' infrastructure. Vector, Wellington International Airport Limited, and the New Zealand Defence Force supported the submission. Greater Wellington staff note the support. Staff consider use of the term 'near' is imprecise, but note the recommendation to replace the term 'alongside' with 'adjacent' in response to the Oil Companies' submission, as this has been defined in case law. Staff also note the structure of the cross-referencing system refers to the objectives directly related to the policy and other policies that need to be taken into account. District and regional councils will take into account all relevant objectives and policies when making decisions on plans.

The NZ Transport Agency requested amendment of the fourth paragraph of the explanation to read '...any effects that may be associated with that infrastructure and to include policies and rules that enable the effects of such activities on regionally significant infrastructure to be robustly assessed.' The submitter also requested an addition to the last paragraph to read 'Similarly, consultation should occur with all operators of regionally significant infrastructure.' Wellington International Airport Limited and the New Zealand Defence Force supported the submission. Vector supported the submission in part but sought wording consistent with their original submission. Greater Wellington staff consider the requirement to assess effects of activities is included in Part II of the Act, as is the requirement to consult all affected parties. The changes are therefore not considered necessary.

The **Oil Companies** requested policy 7 be amended so the term 'alongside' is replaced with 'adjacent'. The Oil Companies and Transpower New Zealand Limited sought reference to upgrading infrastructure as well as operating and maintaining it. The New

Zealand Defence Force supported these submissions. Greater Wellington staff agree that 'alongside' be replaced with 'adjacent' and that upgrading infrastructure can be included where that upgrading is foreseeable and has similar effects to the current infrastructure.

The Oil Companies and Transpower New Zealand Limited requested deletion of the full text of the definition of regionally significant infrastructure from the explanation. PowerCo Limited supported Transpower New Zealand Limited's submission. Greater Wellington staff consider this request appropriate.

The Energy Efficiency and Conservation Authority sought amendments to policy 7 to refer to nationally significant infrastructure and amendment to the definition to refer to supplying the local electricity network and national grid. The New Zealand Defence Force and Mighty River Power supported the submission. Greater Wellington staff note that there is no finalised list of nationally significant infrastructure available to refer to, and consider the council is concerned with regional matters and addresses regional issues so referring to regionally significant infrastructure is appropriate. No change is considered necessary. Staff have recommended 'national electricity grid' be amended to 'electricity transmission network' as defined in the Electricity Governance Rules 2003 where referenced in the facilities for generation and transmission, as this includes facilities for local networks and the national grid. See the report on definitions for recommended changes on the definition of regionally significant infrastructure.

Transpower New Zealand Limited requested policy 7 be amended to refer to effects on the ability to upgrade infrastructure as well as operate and maintain it. Winstone Aggregates, PowerCo Limited, and Wellington International Airport Limited supported the submission. The New Zealand Defence Force supported the request to refer to effects that impact the ability to upgrade infrastructure. Greater Wellington staff agree that upgrading infrastructure can be included where that upgrading is foreseeable and has similar effects to the current infrastructure.

TrustPower Limited sought amendment of policy 7 to read 'District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible new land uses or activities under, over, ~~or~~ alongside or in close proximity.' Wellington International Airport Limited and Masterton District Council opposed the submission. Westfield New Zealand Limited, the New Zealand Defence Force, and Mighty River Power supported the submission, and Vector supported the submission in part. Greater Wellington staff have recommended that the term 'alongside' be replaced with 'adjacent' in response to the Oil Companies' submission, as this has been defined through case law.

Vector sought additional wording to policy 7 to read ‘The owners or operators of regionally significant infrastructure shall be consulted with when such infrastructure is affected by any proposed potentially incompatible land use or activity.’ The submitter also sought that paragraphs three and four of the explanation be amended to refer to protection requirements as well as operating and maintaining infrastructure. PowerCo Limited, the Oil Companies, Wellington International Airport Limited, the New Zealand Defence Force, and Mighty River Power supported the submission. Greater Wellington staff consider the requirement to consult with all affected parties is contained within the Act and it is unnecessary to repeat the requirement in the Regional Policy Statement. Staff have recommended including reference to upgrading of infrastructure as well as operating and maintaining, where the effects of the upgrade are similar to the original infrastructure, and consider this to be sufficient protection.

Wellington City Council, Westfield New Zealand Limited and Wellington International Airport Limited supported policy 7. Paraparaumu Airport Limited supported the submission by Wellington International Airport Limited. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Agenda Development Planning	2/2	Reject
Airways Corporation of New Zealand Ltd	4/5	Accept in part
Winstone Aggregates	15/25	Reject
Genesis Energy	40/5	Reject
Meridian Energy Limited	82/16	Accept in part
Mighty River Power	83/21	Accept in part
New Zealand Defence Force	86/7	Accept
NZ Transport Agency	91/11	Accept in part
NZ Transport Agency	91/12	Reject
Oil Companies	92/9	Accept in part
Oil Companies	92/10	Accept
The Energy Efficiency and Conservation Authority	117/13	Accept in part

Submitter	Submission	Recommendation
Transpower New Zealand Limited	123/16	Accept
Transpower New Zealand Limited	123/20	Accept in part
TrustPower Limited	124/19	Reject
Vector	126/2	Reject
Wellington City Council	131/76	Accept in part
Wellington International Airport Limited	134/7	Accept
Westfield New Zealand Limited	138/21	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend policy 7 and its explanation as follows:

Policy 7: 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 ~~land uses or activities~~ subdivision, use and development occurring under, over, or alongside adjacent to the infrastructure.

Explanation

Regionally significant infrastructure is defined in Appendix 3.
~~includes:~~

- ~~• pipelines for the distribution or transmission of natural or manufactured gas or petroleum~~
- ~~• strategic telecommunications facilities, as defined in section 5 of the Telecommunications Act 2001~~
- ~~• strategic radio communications facilities, as defined in section 2(1) of the Radio Communications Act 1989~~
- ~~• the national electricity grid, as defined by the Electricity Governance Rules 2003~~
- ~~• facilities for the generation and transmission of electricity where it is supplied to the national electricity grid~~

- ~~the local authority water supply network and water treatment plants~~
- ~~the local authority wastewater and stormwater networks, systems and wastewater treatment plants~~
- ~~the Strategic Transport Network, as defined in the Wellington Regional Land Transport Strategy 2007-2016~~
- ~~Wellington city bus terminal and Wellington Railway Station terminus~~
- ~~Wellington International Airport~~
- ~~Commercial Port Areas within Wellington Harbour (including Miramar, Burnham and Seaview wharves) and adjoining land and storage tanks for bulk liquids.~~

Incompatible subdivisions, land uses or activities are those which adversely affect the efficient operation of infrastructure, ~~or its~~ ability to give full effect to any consent or other authorisation, restrict its ability to be maintained, or restrict the ability to upgrade where the effects of the upgrade are the same or similar in character, intensity, and scale. It may also include new land uses that are sensitive to activities associated with infrastructure.

Protecting regionally significant infrastructure does not mean that all land uses or activities under, over, or ~~alongside~~ adjacent are prevented. The Wellington Regional Council and city and district councils will need to ensure that activities provided for in a district or regional plan are compatible with the efficient operation, ~~and maintenance~~, and upgrading (where effects are the same or similar in character, intensity, and scale) of the infrastructure and any effects that may be associated with that infrastructure. ...

2.82 Policy 8: Reducing the use and consumption of non-renewable transport fuels and carbon dioxide emissions from transportation – Regional Land Transport Strategy

Submitter	Submission	Summary
CentrePort Wellington	23/7	Sought the policy be amended to refer to the need to not detrimentally impact on the activities of Regionally Significant Infrastructure.
Korokoro Environment Group	65/4	Sought retention

Submitter	Submission	Summary
NZ Transport Agency	91/13	Requested amendment of the second paragraph to reflect that regional land transport strategies are now prepared for a 30 year timeframe under the Land Transport Management Act 2003.
South Wairarapa District Council	112/20	Opposed the statement that "Carbon dioxide is a greenhouse gas that contributes to climate change". Stated that there is considerable scientific evidence available which has a contrary view to the statement. State that the focus should be on fuel efficiency and the use of sustainable energy so we have resources for the future rather than focusing on science that is still under debate. Suggested rewording the statement to 'Carbon dioxide is a greenhouse gas that may contribute to climate change'.
Paula Warren	128/2	Supported.
Wellington City Council	131/77	Supported policy 8.

(a) Discussion

CentrePort Wellington sought that policy 8 be amended to refer to the need to not detrimentally impact on the activities of regionally significant infrastructure. Greater Wellington staff consider the protection of regionally significant infrastructure is adequately provided for in other policies in the Regional Policy Statement.

Korokoro Environment Group sought retention of policy 8. Greater Wellington staff recommend retaining policy 8 as proposed.

NZ Transport Agency requested an amendment to the second paragraph of the explanation to policy 8 to refer to the land transport strategies now being prepared for 30 year time frames. Greater Wellington staff note the current Regional Land Transport Strategy is for a ten year period, so it is appropriate to refer to that time period at this stage.

South Wairarapa District Council requested amendments to paragraph 1 of the explanation to read ‘...Carbon dioxide is a greenhouse gas that may contribute to climate change.’ Greater Wellington staff consider it is a common misconception that the 'greenhouse effect' is a recent scientific theory, and that there is debate in the scientific community about the role that carbon dioxide has as a greenhouse gas. In fact, the greenhouse effect is a well established scientific principle, supported by experimental evidence since the mid-19th Century. The idea that human produced carbon dioxide (CO₂) could affect global climate was first described in 1896 by

Svante Arrhenius, based on the work of John Tyndall in 1859, who showed that gasses are capable of heat exchange.

It is now a well established scientific fact that CO₂ is a greenhouse gas that contributes to the energy balance of the planet. Without the 'greenhouse effect', life on earth would not be possible. The greenhouse principle works by retaining heat from the sun within the atmosphere and raising the global temperature to a range that allows life to survive.

The earth receives a large amount of energy from the sun in the form of shortwave radiation. Some of this is absorbed at the surface of the planet, but a significant amount of it is re-radiated back to space as longer wave infrared radiation. Some atmospheric gasses are capable of intercepting and absorbing a portion of this thermal infrared radiation, thereby contributing to the warming of the planet. The two most important components of the atmosphere that achieve this are water vapour and CO₂, which constitute respectively; 1.0% and 0.038% of the atmosphere. Carbon dioxide is the fourth most abundant gas in the atmosphere. Two other gases that have an important role in the greenhouse effect are methane (0.0001745%) and ozone (0.00000007%). Despite the small volumes of these gasses, it is important to note the huge effect they have in warming the planet. The amount of warming that these four components contribute is estimated at: water vapour (36–70%); carbon dioxide (9–26%); methane (4–9%); and ozone (3–7%).

It is also a well established scientific fact that changes in atmospheric chemistry have contributed to many of the changes in the global climate over its long history, from warm periods to ice ages. The cold periods have all been associated with low levels of CO₂ and the warm periods with higher levels of carbon dioxide. Some of these have been driven by variations in earth's orbit, others by terrestrial processes, such as large scale volcanic events that have released large volumes of CO₂ into the atmosphere.

Carbon dioxide, in particular, is one of the gasses that human activity is responsible for releasing into the atmosphere, through the burning of fossil fuels and other activities such as cement production and forest clearance. As fossil fuels are burnt, they consume oxygen, at a rate of 2:1, i.e. one part C to two parts O, hence CO₂. There is undeniable evidence that CO₂ has increased dramatically in the atmosphere in the industrial era, whilst at the same time oxygen levels have decreased.

Ice core data stretching back 800,000 years shows clearly that CO₂ has varied between 180 ppm (parts per million) to the pre-industrial level of 270 ppm. Since then, CO₂ levels have increased dramatically. Measurements of CO₂ from the Mauna Loa observatory in Hawaii, supported by measurements made by NIWA from Baring Head, show that atmospheric concentrations of CO₂ have increased from 313 ppm

in 1960 to 383 ppm in 2009. The current level of atmospheric CO₂ exceeds the geological record maximum of 300 ppm. In other words, since the industrial era, the proportion of atmospheric CO₂ by volume has increased from 0.027 % to 0.038 %. Relatively, that equates to an 11% increase since 1750, a rate of change that exceeds anything detected in the geological record. Considering the low volumes of CO₂ that occur naturally in the atmosphere, and considering the huge role the gas has in warming the planet, it is entirely possible that human activities have released enough CO₂ into the atmosphere over the past 250 years to have an impact on the global climate.

The two most commonly discussed measures of global warming are the rise in mean temperature and the rise in sea level. Global mean temperature rose by 0.75°C over the period 1905-2005. Over this period, the rate of warming over the last 50 years was double that in the first half of the century (0.13°C per decade since 1955 versus 0.07°C per decade 1905-1954). The rate of carbon dioxide accumulation and global temperature increase in the past 60 years is unprecedented in the geological record. There is now a 95% confidence that the increase in warming since 1950 has been largely driven by human released CO₂ and that natural warming processes (such as changes in solar radiation) have had a negligible effect on this rise in temperature. Recent analysis of the chemical signature of the CO₂ in the atmosphere has shown that a fair proportion of the CO₂ has been derived from the burning of fossil fuels, and not derived from natural sources such as volcanoes.

One of the main effects of this warming has been to trigger an accelerated rise in sea level, through a combination of melting ice and thermal expansion of seawater. Ocean temperature has increased in the period from 1950 and recent measurements have revealed that in places this warming extends to depths of 3000 m. Analysis of tide gauge records from around the world shows that over the last 150 years, sea level has risen at an average rate of 1.0-2.0 mm/yr or a total of 0.15-0.30 m. Measurements from the 20th Century alone indicate that the rise has been in the upper end of this average at 1.7 ±0.2 mm/yr. Over the period 1961-2003 the rate was 1.8 mm/yr with a range of 1.3-2.3 mm/yr. In the decade from 1993 to 2003 the rate was faster still, rising at around 3.1 mm/yr with a range of 2.4-3.8 mm/yr. Measurements taken from ports in New Zealand dating back to the late 19th Century all show that sea levels have been rising locally at an average rate of 1.6 ±0.2 mm/yr for the past 100 years.

Whilst there may be debate surrounding some of the finer points of climate change, there is no question that there has been a measureable rise in global mean temperature and sea level over the past 100 years. Carbon dioxide may be essential to the growth and survival of plant life, but too much of it, too quickly will have devastating consequences on the entire biosphere. Climate change is already having an impact on our communities and will continue to be the major planning issues over the coming century. It is critical that we

recognise this and begin planning for it today. It is therefore recommended that this change not be made.

Paula Warren and Wellington City Council supported policy 8. Greater Wellington staff note the support.

(b) Recommended decision

Submitter	Submission	Recommendation
CentrePort Wellington	23/7	Reject
Korokoro Environment Group	65/4	Accept
NZ Transport Agency	91/13	Reject
South Wairarapa District Council	112/20	Reject
Paula Warren	128/2	Accept
Wellington City Council	131/77	Accept

(c) Recommended changes

No changes are recommended to policy.

2.83 Policy 9: Promoting travel demand management - district plans and the Regional Land Transport Strategy

Submitter	Submission	Summary
Agenda Development Planning	2/3	Requested addition of '(c) inefficient land use patterns that lead to (a) and (b)' and consequential grammatical changes.
CentrePort Wellington	23/8	Supported in part but concerned at the potential use of cordon charges or congestion pricing mechanisms if freight operators were not exempt. Sought that the policy be amended to make reference to essential commercial uses such as the movement of freight and refer to the need to not detrimentally impact on the activities of regionally significant infrastructure.
Paula Warren	128/3	Supported. Stated that the policy should not just be related to non-renewable transport fuels and carbon dioxide, but also other impacts on landscape, land forms, biodiversity, water, coastal environment, public open space, noise, air pollution etc.
Wellington City Council	131/78	Supported policy 9.

(a) Discussion

Agenda Development Planning requested an addition to policy 9 to read '(c) inefficient land use patterns that lead to (a) and (b)'. Travel demand management includes both alternative demand mechanisms (such as passenger transport, cycling and walking) and travel demand optimisation mechanisms (such as road network efficiency, demand suppression and the integration of land use with transportation). Greater Wellington staff therefore do not consider the additional clause necessary as it is already covered by the reference to travel demand mechanisms at the top of the policy.

CentrePort Wellington supported policy 9 in part but requested an amendment to make reference to essential commercial uses such as the movement of freight and the need to not detrimentally impact on the activities of regionally significant infrastructure. Greater Wellington staff note the support. The decisions regarding what tools to apply and to what classes of transport they should apply are best left to the district plans and Regional Land Transport Strategy. Impacts on regionally significant infrastructure are addressed in other policies, which will be considered as a whole in district plans and the Regional Land Transport Strategy as appropriate.

Paula Warren supported policy 9 but stated that it should relate to other impacts such as those on landscape, land forms, biodiversity, water, coastal environment, public open space, noise, and air pollution. Greater Wellington staff note the support, but consider that the other matters are addressed elsewhere in the Regional Policy Statement and will be considered as a whole in district plans and the Regional Land Transport Strategy as appropriate.

Wellington City Council supported policy 9. Their support is noted

(b) Recommended decision

Submitter	Submission	Submitter
Agenda Development Planning	2/3	Reject
CentrePort Wellington	23/8	Accept in part
Paula Warren	128/3	Accept in part
Wellington City Council	131/78	Accept

(c) Recommended changes

No changes are recommended to policy 9.

2.84 Policy 10: Promoting energy efficient design and small scale renewable energy generation – district plans

Submitter	Submission	Summary
Agenda Development Planning	2/4	Requested 'promote energy efficient design and urban form and the use of small scale renewable...' Requested addition of '(c) Establish minimum sunlight exposure thresholds for new residential subdivision.' with consequential grammatical changes.
Department of Conservation	31/7	Sought the following decision from the Council: That the explanatory note sets out that, in achieving this policy, freshwater ecosystems and fish passage are not to be adversely impacted upon.
F10/2	Wellington Fish and Game Council	Support
Genesis Energy	40/6	Sought retention
F5/23	PowerCo Limited	Support
Korokoro Environment Group	65/5	Sought retention of policy as is.
Masterton District Council	74/8	Sought that policy 10 be amended to read: 'Encouraging energy efficient design and large and small scale renewable energy generation'.
Meridian Energy Limited	82/17	Sought that the policy be amended to read: 'District plans shall include policies and, where appropriate, rules that: ...'
Porirua City Council	100/15	Supported the intent to policy 10. However requested that Greater Wellington reconsider the use of the term 'small scale'. Noted that the proposed National Policy Statement for Renewable Energy Generation defines small scale renewable energy as up to 4MW, which is the size of the turbines being constructed at Makara. Noted that this is inconsistent with the scale described in the explanation to the policy. Therefore sought, to avoid this inconsistency and future conflict, that the term 'small scale' be replaced with the term 'domestic scale'.

Submitter	Submission	Summary
F12/14	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
The Energy Efficiency and Conservation Authority	117/14	Supported and sought retention of policy 10.
TrustPower Limited	124/20	Sought that the policy explanation be amended by adding '...District Plans should promote the use and development of renewable energy generation, including small scale renewable energy generation activities ...'
F24/111	Masterton District Council	Support
F26/37	Mighty River Power	Support
Wellington City Council	131/79	Supported policy 10.

(a) Discussion

Agenda Development Planning sought that policy 10(a) be amended as underlined to read 'promote energy efficient design and urban form and the use of small scale renewable energy generation' and requested an addition to policy 10 to read '(c) establish minimum sunlight exposure thresholds for new residential subdivision.' Greater Wellington staff note that urban form is addressed in other policies in the Regional Policy Statement. District councils should consider whether setting minimum sunlight hours is an issue that needs addressing in their district. It is therefore not recommended that any change be made.

The **Department of Conservation** requested that policy 10 be amended to note that, in achieving this policy, freshwater ecosystems and fish passage are not to be adversely impacted upon. Wellington Fish and Game Council supported the submission. Greater Wellington staff note that these matters are addressed elsewhere in the Regional Policy Statement and in Part II of the Act. When decisions

are made competing considerations and potential effects need to be balanced. Staff also note that freshwater may not always be impacted as renewable energy generation may not always be hydro. It is therefore not recommended that any change be made.

Genesis Energy sought retention of policy 10. PowerCo Limited supported the submission. Greater Wellington staff recommend retaining policy 10 with some amendments in response to other submissions.

Korokoro Environment Group sought retention of policy 10 as is. Greater Wellington staff have recommended retaining policy 10 with some amendments in response to other submissions.

Masterton District Council sought policy 10 be amended to read (additions in underline, deletions in strikethrough) '~~Promoting~~ Encouraging energy efficient design and small scale renewable energy generation'. Greater Wellington staff consider that there is no practical difference between the two words and 'promoting' is consistent with the wording used throughout the Regional Policy Statement.

Meridian Energy Limited sought that policy 10 be amended as underlined to read 'District plans shall include policies and, where appropriate, rules that...'. Greater Wellington staff consider rules and other methods would be appropriate mechanisms to provide for energy efficient alterations to existing buildings. Staff therefore recommend amending policy 10 to include rules and other methods with wording consistent with other policies.

Porirua City Council requested that the term 'small scale' be replaced with 'domestic scale'. Kiwi Income Property Trust, Kiwi Income Properties Ltd, and Kiwi Properties Management Ltd supported the submission. Greater Wellington staff note that the intent of the policy is to relate to domestic and small community scale, and agree that 'small scale' needs clarifying. The definition in the proposed National Policy Statement on Renewable Energy Generation is consistent with the intent of the policy. It is therefore recommended the term be replaced with 'small and community scale distributed renewable energy generation up to 4MW'.

The Energy Efficiency and Conservation Authority supported and sought retention of policy 10. Greater Wellington staff recommend retaining policy 10 with some amendments in response to other submissions.

TrustPower Limited sought the policy explanation be amended by adding 'District plans should promote the use and development of renewable energy generation, including small scale renewable energy generation activities.' Masterton District Council and Mighty River Power supported the submission. Greater Wellington staff note that

this requirement is the subject of the policy, so there is no need to add it to the explanation.

Wellington City Council supported policy 10. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Agenda Development Planning	2/4	Reject
Department of Conservation	31/7	Reject
Genesis Energy	40/6	Accept
Korokoro Environment Group	65/5	Accept in part
Masterton District Council	74/8	Reject
Meridian Energy Limited	82/17	Accept in part
Porirua City Council	100/15	Accept in part
The Energy Efficiency and Conservation Authority	117/14	Accept
TrustPower Limited	124/20	Reject
Wellington City Council	131/79	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend policy 10 to read:

Policy 10: Promoting energy efficient design and small scale renewable energy generation – district plans

District plans shall include policies and/or rules and other methods that:

- (a) promote energy efficient design and the use of small scale and community-scale distributed renewable energy generation (up to 4MW); and
- (b) provide for energy efficient alterations to existing buildings.

Amend the second paragraph of the explanation to read:

Small ~~scale~~ and community-scale distributed renewable energy generation facilities (up to 4MW) include solar generation particularly for water heating and wind turbines used for on-site or domestic purposes.

2.85 Policy 11: Maintaining and enhancing rivers for aquatic ecosystem health in water bodies – regional plans

Submitter	Submission	Summary
Department of Conservation	31/8	Sought the following decision from the Council: That the policy be retained but the explanation be amended to also note that management of the riparian margin, vegetation clearance, and infilling of streams and ephemeral streams can adversely impact upon aquatic ecosystem health.
F10/3	Wellington Fish and Game Council	Support in part
F19/31	Horticulture New Zealand	Oppose
Federated Farmers of New Zealand	35/31	Sought that the Council clarify how the stated goal will be achieved and what this will mean for everyone in the catchment, this will be more consistent with integrated catchment management thinking And Sought recognition of all uses of water and ensure that environmental flows and levels are based on robust science.
F22/57	Anders Crofoot	Support
F24/44	Masterton District Council	Support
Horticulture New Zealand	50/21	Stated that the approach to setting 'bottom lines' for water quality is generally supported, to the extent that rivers are to be assessed for the appropriate purpose and management. This is much preferred to a blanket purpose across the region. However states that it also includes managing water bodies for other identified purposes. It needs to be clear how determination of 'other purposes' will be undertaken through the regional plan. Sought retention of policy 11 but addition to the explanation with criteria for managing for identification for other purposes

Submitter	Submission	Summary
F22/58	Anders Crofoot	Support
Lower Hutt Forest and Bird Protection Society	66/3	Supported policy.
F24/69	Masterton District Council	Oppose
Masterton District Council	74/9	Sought that a policy should be included for the use of waterways to convey water.
Masterton District Council	74/10	Sought that provision should be made for the maintenance of waterways to prevent flooding and damage to private property.
Masterton District Council	74/11	Sought that policy. 11(b) be expanded to list the 'other identified purposes' which should include: <ul style="list-style-type: none"> • the transfer and control of stormwater • protection of private property
Meridian Energy Limited	82/18	Sought that the policy be amended to read: 'Regional plans shall include policies, rules and/or methods that: (a) enable sustainable use of water and require, as a minimum, that water quality, flows and water levels, and aquatic habitat sufficient to maintain the life supporting capacity of the aquatic ecosystem' and consequential amendments to the explanation, to make policies 11, 12, and 39 consistent with each other and section 5 of the Resource Management Act 1991.
F16/9	Genesis Energy	Support
F24/83	Masterton District Council	Support
Mighty River Power	83/22	Sought that the policy be amended to provide the ability to remedy and/or mitigate the adverse effects of water for purposes not identified in the policy, and provide for environmental compensation in some circumstances.
F1/67	Winstone Aggregates	Support in part

Submitter	Submission	Summary
F19/32	Horticulture New Zealand	Support
F24/93	Masterton District Council	Support
Regional Public Health	105/2	Sought following change to explanation to policy 11. Some water bodies may be managed for other purposes – such as food gathering, contact recreation, water supply, groundwater protection or cultural purposes. Stated that the use of the term food gathering is more consistent with the wording used in policy 5: maintaining and enhancing coastal water quality for aquatic ecosystem health – regional plans and in policy 48: Avoiding adverse effects on matters of significance to tangata whenua – consideration.
F24/98	Masterton District Council	Oppose
TrustPower Limited	124/21	Sought clause (a) be amended to read: 'require, as a minimum, that water quality, flows and water levels, and the aquatic habitat of all water bodies are to be managed in such a way that ensures the maintenance and enhancement of aquatic ecosystem health is given particular regard; and'. that clause (b) be amended to read: '(b) manage water bodies for other identified purposes including: (i) Water supply (ii) Renewable energy generation (iii) Contact recreation (iv) Groundwater supply (v) Trout fishery (vi) Cultural purposes Also that the explanation be amended to read: '... Some water bodies may also be managed for other purposes – such as trout fishery, contact recreation, water supply, renewable energy generation, groundwater protection, or cultural purposes. Where they are identified in regional plans, management purposes will establish limits and guide decisions on water quality, flows and water levels, and managing aquatic habitat.'

Submitter	Submission	Summary
F17/36	Meridian Energy Limited	Support in part
F24/112	Masterton District Council	Support in part
F26/38	Mighty River Power	Support
F23/46	Federated Farmers of New Zealand	Support in part
Wairarapa Regional Irrigation Trust	127/5	The safeguarding of habitats and ecosystems was supported. Welcomed the recognition that water bodies may be managed for other than environmental purposes and that in these cases, base limits will be established. Stated that these limits will need to take account of all of the potentially competing needs of the different management purposes.
F23/47	Federated Farmers of New Zealand	Support
Wellington Fish and Game Council	133/22	Opposed. Sought addition of "(c) enhance or maintain river suitable for contact recreation"
F24/128	Masterton District Council	Oppose
Wellington City Council	131/80	Supported policy 11.

(a) Discussion

The Department of Conservation sought the retention of the policy with an amendment to note that management of the riparian margin, vegetation clearance, and infilling of streams and ephemeral streams can adversely impact upon aquatic ecosystem health. The submission was supported in part by Wellington Fish and Game Council and opposed by Horticulture New Zealand. Greater Wellington staff note that Policy 11 is to establish in regional plans the purposes for managing water bodies and the water quality, flows and water levels and habitat conditions that they are to be managed for. The matters raised by the submitter are addressed separately in policies for the

management of ecological function, in particular policies 16 and 42. No change is recommended in response to the submission.

Federated Farmers of New Zealand sought that the Council clarify how the stated goal will be achieved and what this will mean for everyone in the catchment. Greater Wellington staff comment that the policy will be implemented through review of the regional plan, which goes through a similar consultation process to that required for the Regional Policy Statement. The policy is implemented by method 2 of the Regional Policy Statement. The submitter also sought recognition of all uses of water and to ensure that environmental flows and levels are based on robust science. Greater Wellington staff comment that water quality and flow limits established for identified management purposes are available for uses associated with those purposes. Water is also available for other uses subject to any limits established in the regional plan. A comment to this effect is included in the explanation to the policy. It is recognised that setting flows and water levels should rely on robust science. The submission of Federated Farmers of New Zealand was supported by Anders Crofoot and Masterton District Council.

Horticulture New Zealand sought retention of policy 11 but requested an addition to the explanation with criteria for managing the identification for other purposes. The submission was supported by Anders Crofoot. Greater Wellington staff comment that the use of water management purposes and establishment of water classes is sanctioned by section 69 (1) and the Third Schedule of the Resource Management Act. It is an approach that is currently used in Greater Wellington's Regional Freshwater Plan. Criteria do need to be developed around what water management classes are to be applied in the review of the regional plan, and consultation will occur on it when the current regional plans are reviewed.

Lower Hutt Forest and Bird Protection Society supported policy 11. Their submission was opposed by Masterton District Council. The support for the policy is noted.

Masterton District Council submitted that the last paragraph of this policy should be amended to 'manage water bodies to prevent significant adverse effects on the aquatic ecosystems', as opposed to setting limits. Greater Wellington staff note that the Resource Management Act and case law around it already require water bodies to be managed to avoid significant adverse effects. There seems little point in repeating this in the Regional Policy Statement when the opportunity is available to direct the regional plan to establish limits associated with "significant adverse effects". The present regional plan currently does this through policies and guidelines.

Masterton District Council also sought that provision should be made for the maintenance of waterways to prevent flooding and damage to private property. Greater Wellington staff note that natural

hazard issues of regional significance are addressed in policies 28, 50 and 51. The maintenance of waterways to prevent flooding and damage to private property are operational matters for local authorities to address under the Local Government Act 2004 and the Soil Conservation and Rivers Control Act 1941. Greater Wellington's Flood Protection Department has a "watercourses agreement" with city and district councils in the western part of the region that identifies the circumstances when respective councils are responsible for any action that might be required in relation to flooding and private property in urban areas. This kind of agreement lies outside the scope of the Regional Policy Statement but is the sort of approach that could be suitable to address the operational matter that the submitter has raised.

The Masterton District Council sought that policy 11(b) be expanded to list the 'other identified purposes' which should include: the transfer and control of stormwater; and protection of private property. The purpose of "conveying" water is also specifically mentioned. Greater Wellington staff comment that the water management purposes mentioned in the explanation with the policy are examples only. A change is made to clarify this. The purposes for managing water need to be developed when the regional plan is reviewed and consultation will occur on the purposes that water is to be managed for in the region at this time.

Meridian Energy sought that the policy be amended to read: 'Regional plans shall include policies, rules and/or methods that: (a) enable sustainable use of water and require, as a minimum, that water quality, flows and water levels, and aquatic habitat sufficient to maintain the life supporting capacity of the aquatic ecosystem' and consequential amendments to the explanation, to make policies 11, 12, and 39 consistent with each other and section 5 of the Resource Management Act 1991. Greater Wellington staff comment that the purpose of the Resource Management Act is to promote sustainable management (as opposed to "sustainable use") and there seems little merit in repeating the meaning of sustainable management in policy 11 when it is already stated in section 5(2) of the Resource Management Act. The other elements of policy 11 that Meridian Energy seek to amend are by deleting the reference to "purpose" and replacing "aquatic ecosystem health" with "life supporting capacity of aquatic ecosystems". Greater Wellington staff comment that the use of water management purposes and establishment of water classes is sanctioned by section 69(1) and the Third Schedule of the Resource Management Act. It is an approach currently used in the Regional Freshwater Plan, which identifies that water quality of all surface water in the region is to be managed for aquatic ecosystem purposes. It is acknowledged that aquatic ecosystem health is different terminology than life supporting capacity of aquatic ecosystems but this does not make it inconsistent with section 5 of the Resource Management Act. Nor are there inconsistencies between policies 11,

12 and 39. The submission of Meridian Energy was supported by Genesis Energy and Masterton District Council.

Mighty River Power sought that the policy be amended to provide the ability to remedy and/or mitigate the adverse effects of water for purposes not identified in the policy. Greater Wellington staff comment that water quality and flow limits established for identified management purposes are available for uses associated with those purposes. Water is also available for other uses subject to any limits established in the regional plan. A comment to this effect is included in the explanation to the policy.

Mighty River Power also sought provision for environmental compensation in some circumstances. Greater Wellington staff consider that policy on environmental compensation is a relevant matter for consideration. Environmental compensation is a developing concept in New Zealand environmental law. In several decisions to date the courts have recognised it as an appropriate tool. In the Wellington region it has been applied in resource consent applications, such as for wind farm proposals to offset adverse effects that cannot otherwise be avoided remedied or mitigated.

During consultation on the Regional Policy Statement, two parties (Mighty River Power were one) raised the issue of environmental compensation, although only Mighty River Power have submitted on the proposed Regional Policy Statement. Both parties mention environmental compensation in the context of fresh water. Greater Wellington staff recognise that statutory policies on environmental compensation are appropriate. The issue to be resolved here is whether such policies are appropriate in the Regional Policy Statement or the regional plan (and district plans)

The region's city and district councils (with the exception of Masterton District Council who have supported this submission) have not indicated that policies on environmental compensation are needed in the Regional Policy Statement to assist them. However, city and district councils can decide to include policies on environmental compensation in their district plans that are tailored to their areas of jurisdiction.

Environmental compensation is site and development specific, and has to be addressed on a case by case basis through the resource consent process. The policies the submitter is seeking are specific to fresh water and are appropriate in the regional plan not the Regional Policy Statement. That is where current provisions supporting the use of environmental compensation currently lie, namely policies 4.2.5 and 4.2.6 of the Regional Freshwater Plan. It is recognised that these provisions in the Regional Freshwater Plan are no longer appropriate given recent case law and practice. Review of the Regional Freshwater Plan commences in December 2009 and new approaches

relating to environmental compensation since 1999, when the plan became operative, will need to be considered.

The submission of Mighty River Power was supported by Winstone Aggregates, Horticulture New Zealand and Masterton District Council.

Regional Public Health sought a change to the explanation to policy 11 that used the term “food gathering” instead of “cultural purposes”. The submission was opposed by Masterton District Council. Greater Wellington staff comment that these terms are used as examples only and either would do the job. “Cultural purposes” is the term used in the Third Schedule of the Resource Management Act and may be better to include because it is sufficiently broad to indicate that other more specific management purposes could be selected when the Regional Freshwater Plan is prepared.

TrustPower Limited sought an amendment to clause (a) that deleted reference to “purpose” and referred to “maintain and enhance” rather than “maintain or enhance”. Greater Wellington staff recommend leaving the reference to the term purpose because it is sanctioned by section 69 (1) and the Third Schedule of the Resource Management Act, and it conveys the intent for management of the water body. A change to “maintain and enhance” is recommended because this is the term used in the Resource Management Act. TrustPower Limited also sought a list of management purposes in clause (b). Greater Wellington staff comment that purposes need to be developed around water management in the review of the regional plan and consultation will occur on it when the current regional plans are reviewed. It is not appropriate to identify a full set of management purposes at this time. TrustPower Limited also wanted to include renewable energy generation with the other examples of water management purposes. The examples used are from current water management purposes in the Regional Freshwater Plan. It will be appropriate to expand this list according to the purposes that water bodies are to be managed for at the time the Regional Freshwater Plan is prepared. The submission of TrustPower Limited was supported by Meridian Energy, Masterton District Council, Mighty River Power and Federated Farmers of New Zealand.

Wairarapa Regional Irrigation Trust supported the safeguarding of habitats and ecosystems. The submission was supported by Masterton District Council. The support is noted.

Wellington Fish and Game Council sought the addition of “(c) enhance or maintain rivers suitable for contact recreation”. This was opposed by Masterton District Council. Greater Wellington staff comment that the identification of contact recreation as a purpose for managing water bodies will be done when the Regional Freshwater Plan is prepared.

Wellington City Council supported policy 11. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Department of Conservation	31/8	Reject
Federated Farmers of New Zealand	35/31	Accept in part
Horticulture New Zealand	50/21	Reject
Lower Hutt Forest and Bird Protection Society	66/3	Accept
Masterton District Council	74/9	Reject
Masterton District Council	74/10	Reject
Masterton District Council	74/11	Accept in part
Meridian Energy Limited	82/18	Reject
Mighty River Power	83/22	Accept in part
Regional Public Health	105/2	Reject
TrustPower Limited	124/21	Accept in part
Wairarapa Regional Irrigation Trust	127/5	Accept
Wellington Fish and Game Council	133/22	Reject
Wellington City Council	131/80	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend policy 11 and its explanation as follows:

Policy 11: Maintaining and enhancing aquatic ecosystem health in water bodies – regional plans

Regional plans shall include policies, rules and/or methods that:

- (a) require, as a minimum, that water quality, flows and water levels, and the aquatic habitat of all surface water

bodies are to be managed for the purpose of maintaining and ~~or~~ enhancing aquatic ecosystem health; and

- (b) manage water bodies for other identified purposes.

Explanation

~~Regional plans will establish limits for water quality, flows and water levels that safeguard aquatic habitats and ecosystems in water bodies.~~ management purposes for water bodies in the region and identify limits for water quality, flows and water levels, and/or aquatic habitat appropriate to the management purposes identified.

Clause (a) requires the management purpose of aquatic ecosystem health to apply to all surface water bodies in the region. The narrative standard for aquatic ecosystems in the Third Schedule to the Resource Management Act will be used as a guide to the basis for safeguarding what is needed for aquatic ecosystem protection in terms of water quality. The flows and water levels required for aquatic ecosystems will be guided by the “Guidelines for the selection of methods to determine ecological flows and water levels” (Ministry for the Environment, 2008).

Clause (b) provides for some water bodies may to also be managed for other purposes – ~~such as~~ examples are trout fishery, contact recreation, water supply, groundwater protection, or cultural purposes. Where they are identified in regional plans, management purposes will establish limits and guide decisions on water quality, flows and water levels, and/or managing aquatic habitat.

Where a water body is assigned more than one management purpose in a regional plan, the limits associated with the most stringent water quality, river flows and water levels shall ~~apply not be less than the limits established for aquatic ecosystem health.~~

Water quality, flows and water levels, and/or aquatic habitat established for management purposes identified in regional plans are suitable for uses associated with those purposes. Water is also available for other uses subject to any limits established in the regional plan.

2.86 Policy 12: Allocating water - regional plans

Submitter	Submission	Summary
Department of Conservation	31/9	Sought that the policy be retained with the proposed wording.

Submitter	Submission	Summary
Federated Farmers of New Zealand	35/32	Sought policy 12 be amended to include recognition of all uses of water and ensure that environmental flows and levels are based on robust science.
F22/59	Anders Crofoot	Support
F24/45	Masterton District Council	Support
Fonterra Co-operative Group Ltd	36/2	Supported the addition of explicit considerations of and support for the storage and associated improvements to water infrastructure, to assist in meeting the medium to long term water needs of the rural and urban communities.
Horticulture New Zealand	50/22	Sought retention of policy 12.
F22/60	Anders Crofoot	Support
Kapiti Coast District Council	56/21	Supported the intention of policy 12 (allocating water)
Meridian Energy Limited	82/19	Sought that the policy be amended to read 'Regional plans shall include policies and/or rules that: (a) establish allocation limits for the total amount of water that can be taken from rivers and groundwater without compromising the life-supporting capacity of the aquatic ecosystem health; and (b) establish guidelines or assessment criteria for determining the appropriate balance between use and development of water resources to meet human needs and maintaining or enhancing aquatic ecosystem health' and consequential amendments to the explanation, to make policies 11, 12, and 39 consistent with each other and section 5 of the Resource Management Act 1991.
F19/34	Horticulture New Zealand	Support in part
F24/84	Masterton District Council	Support
Mighty River Power	83/23	Sought that the explanation be amended to recognise that the allocation limits should not be absolute and that there are circumstances where environmental compensation may be an appropriate alternative to

Submitter	Submission	Summary
		complying with the minimum flows.
F1/68	Winstone Aggregates	Support in part
F16/20	Genesis Energy	Support
F17/37	Meridian Energy Limited	Oppose
F19/33	Horticulture New Zealand	Support
Wairarapa Regional Irrigation Trust	127/6	Believed that it is vital that any policies and/or rules on allocation limits are clear, definitive and based on scientific fact. They must also be set in consultation with all users of the resource.
F23/48	Federated Farmers of New Zealand	Support
Wellington City Council	131/81	Supported policy 12.

(a) Discussion

Department of Conservation sought that the policy be retained with the proposed wording. Staff recommend retaining the policy as proposed.

Federated Farmers of New Zealand sought an amendment to policy 12 to include recognition of all uses of water and ensure that environmental flows and levels are based on robust science. The submission was supported by Anders Crofoot and Masterton District Council. Greater Wellington staff note that Policy 12 provides for regional plans to include allocation limits that apply to all water taken from water bodies. Water is only taken from water bodies if it is going to be used and all uses are included. There is no mention of environmental flows and water levels in the policy. Environmental flows and water levels are addressed in policy 11.

Fonterra Co-operative Group Ltd supported the addition of explicit considerations of and support for the storage and associated improvements to water infrastructure. Greater Wellington staff note that policy 18 promotes water harvesting.

Horticulture New Zealand sought retention of policy 12. The submission was supported by Anders Crofoot. Staff recommend retaining the policy as proposed.

Kapiti Coast District Council supported the intention of policy 12 (allocating water). The support is noted.

Meridian Energy sought an addition to policy 12 “(b) establish guidelines or assessment criteria for determining the appropriate balance between use and development of water resources to meet human needs and maintaining or enhancing aquatic ecosystem health”. The submission was supported by Horticulture New Zealand and Masterton District Council. Greater Wellington staff note that Policy 12 is a regulatory policy that directs key policies, rules and/or methods that must be in the regional plan. The guideline or criteria that Meridian Energy are seeking could be included in the regional plan as guidance for resource consents. The merits of such an approach can be considered then, rather than being set as a requirement of the Regional Policy Statement.

Mighty River Power sought that the explanation be amended to recognise that the allocation limits should not be absolute and that there are circumstances where environmental compensation may be an appropriate alternative to complying with the minimum flows. The submission was supported by Winstone Aggregates, Genesis Energy, Meridian Energy and Horticulture New Zealand. Greater Wellington staff note that policy 12 applies to “taking” water not minimum flows or water levels, which are addressed in policy 11. Knowledge of how much water can be taken from water bodies provides certainty about how much water is available. It is considered that the matter of environmental compensation relates to minimum flows and water levels, not the amount of water allocated. Therefore, policy in relation to environmental compensation is addressed in the report on policy 11.

Wairarapa Irrigation Trust considered that it is vital that any policies and/or rules on allocation limits are clear, definitive and based on scientific fact. The submission was supported by Federated Farmers of New Zealand. Greater Wellington staff note these comments.

Wellington City Council supported policy 12. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Department of Conservation	31/9	Accept
Federated Farmers of New Zealand	35/32	Reject

Submitter	Submission	Recommendation
Fonterra Co-operative Group Ltd	36/2	Accept in part
Horticulture New Zealand	50/22	Accept
Kapiti Coast District Council	56/21	Accept
Meridian Energy Limited	82/19	Reject
Mighty River Power	83/23	Reject
Wairarapa Regional Irrigation Trust	127/6	Note
Wellington City Council	131/81	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

No change is recommended to policy 12.

2.87 Policy 13: Minimising contamination in stormwater from new development - regional plans

Submitter	Submission	Summary
Department of Conservation	31/10	Sought the following decision from the Council: The policy be retained with the proposed wording, but that the explanation be amended as follows: "Wellington and Porirua Harbours and Pauatahanui Inlet are places where ecotoxic contaminants in bottom sediments have been found to occur at concentrations that exceed guidelines for aquatic life."
F10/4	Wellington Fish and Game Council	Support
F15/13	Porirua City Council	oppose

Submitter	Submission	Summary
Friends of Owhiro Stream	38/1	Stated that policy 13 should make explicit the impact of flow quantity on the effects of contaminants in stormwater (i.e. a more explicit link between policies 13 and 16). Stated that this could be achieved through the following wording: "Regional plans shall include policies, methods and/or rules that protect aquatic ecosystem health by minimising additional stormwater flow, and ecotoxic and other...., from new subdivision and development".
Horticulture New Zealand	50/23	Sought deletion of 'development' from policy 13 or for the Council to specify the type of development that the policy will apply to.
F22/61	Anders Crofoot	Support
Kapiti Coast District Council	56/22	Requested that policy 13 (minimising contamination in stormwater) be stronger by specifying a desired level or by particular method such as those set out in policy 41. Stated that it may be useful to either include a specific target such as Auckland Regional Councils "75% removal of total suspended solids (TSS) on all sites", noting that this is a very high standard that Auckland is having trouble meeting or identify problem areas and have continuous improvement in those areas. Stated that current practice is to seek continuous improvement in trouble spots identified through water quality monitoring. Setting a high target could be very expensive for developers and the Council.
F1/48	Winstone Aggregates	Oppose
F24/62	Masterton District Council	Oppose
South Wairarapa District Council	112/21	Sought that the paragraph should be headed "Minimising contamination in stormwater from new development and upgrades to existing development"
Wellington City Council	131/82	Supported policy 13.

(a) Discussion

Department of Conservation sought the policy be retained with the proposed wording, but that the explanation be amended as follows:
"Wellington and Porirua Harbours and Pauatahanui Inlet are places

where ecotoxic contaminants in bottom sediments have been found to occur at concentrations that exceed guidelines for aquatic life.” The submission was supported by Wellington Fish and Game Council, and opposed by Porirua District Council. Greater Wellington staff note that Porirua Harbour naming is consistent with the Geographic Board but to avoid any misunderstanding reference should be made the Onepoto Arm and Pauatahanui Inlet

Friends of Owhiro Stream stated that policy 13 should make explicit the impact of flow quantity on the effects of contaminants in stormwater. Greater Wellington staff note that policy 13 targets the accumulation of ecotoxic contaminants in receiving waters and treatment of stormwater to reduce these effects. Stormwater quantity is addressed through policy 41 which requires city and district councils to take steps to reduce stormwater flows when considering subdivision and land use consents. It is considered that retaining this division is the most effective and efficient way to minimise stormwater contamination in receiving water bodies.

Horticulture New Zealand sought deletion of ‘development’ from policy 13, or for the Council to specify the type of development that the policy will apply to. The submission was supported by Anders Crofoot. Development in this context has the same meaning as is used in section 5 of the Act. The specific developments that may be affected will be identified in the regional plan following consultation with city and district councils, and people and communities when the regional plan is reviewed.

Kapiti Coast District Council requested that policy 13 (minimising contamination in stormwater) be stronger by specifying a desired level or by a particular method such as those set out in policy 41. The submission was opposed by Winstone Aggregates and Masterton District Council. Greater Wellington staff note that policy 13 is directed at discharges. The standards required for receiving waters will be established in the Regional Plan through implementation of policy 11 of the Regional Policy Statement. These standards will have to be met through appropriate treatment when applications for resource consents are made. Policy 41 relates to subdivision and land use and sets out specific matters to be considered that are relevant to these activities. No change is recommended in response to this submission

South Wairarapa District Council sought that the paragraph should be headed "Minimising contamination in stormwater from new development and upgrades to existing development". Greater Wellington staff accept that new development may include upgrades to existing development. Development in this context has the same meaning as is used in section 5 of the Act. What is meant by new development does need to be defined further and this will need to be done when the regional plan is reviewed in consultation with city and district councils and people and communities.

Wellington City Council supported policy 13. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Department of Conservation	31/10	Accept in part
Friends of Owhiro Stream	38/1	Reject
Horticulture New Zealand	50/23	Reject
Kapiti Coast District Council	56/22	Reject
South Wairarapa District Council	112/21	Reject
Wellington City Council	131/82	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Change the second paragraph of the explanation to Policy 13 as follows:

Wellington Harbour and Porirua (Onepoto Arm and Pauatahanui Inlet) Harbours are places where ecotoxic contaminants in bottom sediments have been found to occur at concentrations that exceed guidelines for aquatic life.

2.88 Policy 14: Minimising the effects of earthworks and vegetation disturbance - district and regional plans

Submitter	Submission	Summary
Anders Crofoot	25/11	Stated that the policy, and any rules and other methods that flow from this policy, should address the effects – erosion and siltation – and not the activities of earthworks and vegetation clearance. These activities may not necessarily have adverse effects, and it is the adverse effects of activities that council should be concerned with.
F23/49	Federated Farmers of New Zealand	Support in part

Submitter	Submission	Summary
Department of Conservation	31/11	Sought that the policy be retained with proposed wording.
Federated Farmers of New Zealand	35/33	Sought policy 14 be amended as follows: Minimising the effects of large scale earthworks and vegetation clearance on erosion prone land – district and regional plans
F22/62	Anders Crofoot	Support
Federated Farmers of New Zealand	35/34	<p>Opposed the activity based focus of the policy. Stated that there are a number of generic issues for landowners in relation to earthworks which must be given consideration before any policies, rules and methods are introduced to control these activities. These were:</p> <ol style="list-style-type: none"> 1. Earthworks are undertaken on farming properties as a legitimate part of operating a farm business 2. Ancillary earthworks that might be captured by rules in an urban situation (such as earthworks required for a wintering pad) are important to the efficient and effective running of a farming operation – these should remain as permitted activities wherever possible with appropriate site standards 3. Key maintenance activities that ensure the efficient running of farming operations should be permitted such as maintenance of existing tracks and fence lines, yards and service areas 4. Careful consideration should be given to the management of earthworks in landscape areas – landowners should not be penalised by the public's want to impose landscape management controls on their properties – routine farming activities should continue to be permitted where the effects can be managed in a way that restrict their impact to what would normally be expected in a rural zone – any compliance restrictions through the consent process required over and above those in the rural zone should be at no cost to the landowner as they are required by Council on behalf of the public not necessarily to manage the actual environmental effects – Federated Farmers of New Zealand considers that such requirements can be managed through a permissive regime and appropriate site standards 5. Earthworks provisions should not be duplicated

Submitter	Submission	Summary
		<p>through district and regional rules – for example where a consent would be required to manage the effects of earthworks on water through a regional rule, the district plan should be an adjunct to that rule not a replacement for it or an additional requirement – one consent for each activity – where earthworks provisions are covered by regional rules then the district plan should be explicit in stating that a consent may be required from the Wellington Regional Council for earthworks to ensure that any effects can be assessed and managed appropriately</p> <p>6. Definitions must be appropriate to the activity and ensure that no anomalies are created that capture other activities where the effects of the activity would be no more than minor.</p> <p>Sought amendment to include consideration of those above points</p> <p>And</p> <p>Sought consequential amendments as to detail or substance throughout the Policy Statement, in particular the methods section, to give effect to this Submission</p>
F19/35	Horticulture New Zealand	Support
F22/63	Anders Crofoot	Support
Friends of Owhiro Stream	38/2	Stated that as the policy relates to silt and sediment (not just silt), the explanation should be consistent. The words “and sediment” should be added after “silt” in the fourth line of the explanation for policy 14 (p 88).
Horticulture New Zealand	50/24	Sought inclusion of a definition for earthworks and vegetation disturbance and that the roles of the district councils and regional councils be clarified through the Regional Policy Statement process.
F22/64	Anders Crofoot	Support
F23/50	Federated Farmers of New Zealand	Support

Submitter	Submission	Summary
Kapiti Coast District Council	56/23	Particularly supported the need to have sediment control as part of earthworks consents in policy 14.
Mighty River Power	83/24	Sought that policy be amended to read 'Regional and district plans shall include policies, rules and methods that control earthworks and vegetation disturbance in order to avoid, remedy or mitigate the adverse effects of...'
F1/72	Winstone Aggregates	Support
F16/21	Genesis Energy	Support
F17/38	Meridian Energy Limited	Support
TrustPower Limited	124/22	Sought retention as currently worded.
Wellington City Council	131/83	Supported policy 14.

(a) Discussion

Anders Crofoot and **Federated Farmers of New Zealand** sought that the policy directing policies, rules and/or other methods in regional plans address effects – erosion and siltation – and not the activities of earthworks and vegetation clearance. Greater Wellington staff note that the Resource Management Act is silent on whether policies and other methods should address activities or the effects of activities. Greater Wellington staff agree that the effects of activities should be a concern, particularly when considering rules in regional plans. Sections 68(3) and 76(3) of the Resource Management Act provide the basis for considering the effects of activities on the environment in regional and district rules. However, sections 68(4), (5), & (9) and sections 76(4) clearly anticipate that rules are about activities. Sections 9, 12, 13, 14 and 15 refer to rules in the context of various uses and activities. Indeed the categories for rules – permitted activities, controlled activities, etc. - suggest that rules should consider activities as well as the effects of activities. It is recommended that the current wording be retained because earthworks and vegetation clearance are activities known to cause erosion and silt and sediment runoff in the region. The submission of Anders Crofoot was supported by Federated Farmers of New Zealand.

Federated Farmers of New Zealand also sought an amendment to policy 14 to replace “earthworks” with “large scale earthworks” and add “on erosion prone land” to “vegetation clearance”. Greater

Wellington staff note that the policy is not just concerned with the effects of large scale earthworks. For example, earthworks and vegetation clearance in urban areas often require controls in district plans. Implementing policy 14 will be assisted by local authorities addressing method 30 and this will help distinguish what goes into district plans and what goes into the regional plan.

Federated Farmers of New Zealand also identified a number of generic issues for landowners in relation to earthworks which must be given consideration before any policies, rules and methods are introduced to control these activities. Greater Wellington staff note these concerns and comment that they are matters to be considered when regional and district plans are prepared. The submission of Federated Farmers of New Zealand was supported by Anders Crofoot and Horticulture New Zealand.

Department of Conservation sought that the policy be retained with proposed wording. Staff have recommended minor wording changes in response to other submissions.

Friends of Owhiro Stream requested that the words “and sediment” should be added after “silt” in the fourth line of the explanation for policy 14 (p 88). Greater Wellington staff agree with this change.

Horticulture New Zealand sought inclusion of a definition for earthworks and vegetation disturbance and that the roles of the district councils and regional councils be clarified through the Regional Policy Statement process. The submission of Horticulture New Zealand was supported by Anders Crofoot and Federated Farmers of New Zealand. Greater Wellington staff note that definitions of the terms earthworks and vegetation clearance are currently provided in the operative Regional Soil Plan. It is not necessary to include a definition in the Regional Policy Statement because anything beyond the normal dictionary meanings are not required. At the time when regional plans and district plans are prepared and specific provisions are made, including rules, definitions will be needed. It is also noted that the roles of the district councils and regional councils will be clarified through the implementation of method 30 of the Regional Policy Statement.

Kapiti Coast District Council particularly supported the need to have sediment control as part of earthworks consents in policy 14. The support is noted.

Mighty River Power sought to add “ ... order to avoid, remedy or mitigate the adverse effects .. ” to policy 14. The submission was supported by Winstone Aggregates, Genesis Energy and Meridian Energy. Greater Wellington staff comment that the direction “ ... avoiding, remedying or mitigating adverse effects on the environment ... “ is set out in section 5 of the Resource Management Act and it is unnecessary to repeat it in the Regional Policy Statement.

TrustPower Limited sought retention of the policy as currently worded. **Wellington City Council** supported policy 14. The submitters support is noted. Staff have recommended retaining the policy with a minor amendment.

(b) Recommended decision

Submitter	Submission	Recommendation
Anders Crofoot	25/11	Reject
Department of Conservation	31/11	Accept in part
Federated Farmers of New Zealand	35/33	Reject
Federated Farmers of New Zealand	35/34	Reject
Friends of Owhiro Stream	38/2	Accept
Horticulture New Zealand	50/24	Reject
Kapiti Coast District Council	56/23	Accept
Mighty River Power	83/24	Reject
TrustPower Limited	124/22	Accept in part
Wellington City Council	131/83	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend policy 14 and its explanation as follows:

Policy 14: Minimising the effects of earthworks and vegetation disturbance – district and regional plans

Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to minimise:

- (a) erosion; and
- (b) silt and sediment runoff into water, or onto land that may enter water, so that aquatic ecosystem health is safeguarded.

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. Many small scale earthworks – such as driveways and retaining walls – can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies, as do large scale earthworks on erosion prone land.

2.89 Policy 15: Promoting discharges to land - regional plans

Submitter	Submission	Summary
Department of Conservation	31/12	Stated that prior to discharging human or animal waste to land that it should be appropriately treated so as to avoid/mitigate the effects on the environment. Sought the following decision from the Council: Policy 15(a) be replaced with the following wording: “promote the treatment of human and animal waste and the discharge of such treated waste to land rather than water, particularly discharges of sewage; and”
F10/5	Wellington Fish and Game Council	Support
F24/9	Masterton District Council	Support
Federated Farmers of New Zealand	35/35	Sought that policy 15 be amended to differentiate between point source and non point source discharges.
F19/36	Horticulture New Zealand	Support
F22/65	Anders Crofoot	Support
Fonterra Co-operative Group Ltd	36/3	Supported the use of rules and methods that promote discharges of animal waste to land rather than to water
Horticulture New Zealand	50/54	Sought that policy 15 be retained
F22/66	Anders Crofoot	Support

Submitter	Submission	Summary
F24/58	Masterton District Council	Oppose in part
Masterton District Council	74/12	Sought that policy 15 uses the words 'encourage and consider', instead of 'promote'.
John Charles and Mary McGuinness	75/1	Requested the term 'collective' be deleted from policy 15(b) and the second paragraph of the explanation be deleted.
Porirua City Council	100/16	Sought that the policy be retained
F12/15	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
South Wairarapa District Council	112/22	Sought clause (b) be changed to include "promote the use of collective sewerage treatment systems where feasible."
Upper Hutt City Council	125/5	Sought that policy 15(b) be amended to read: (b) promote, where practical and acceptable to the territorial authority concerned, the use of collective sewerage treatment systems that discharge to land... or such other relief to address the submitters concerns.
Watersmart Ltd	129/1	Sought the following changes to policy 15 of the Regional Policy Statement – add (c) promote greywater re-use for irrigation purposes
F2/1	Craig Brown	Support
Wellington City Council	131/84	Supported policy 15.

(a) Discussion

Department of Conservation requested that any discharge to land of human or animal waste be required to be treated first. The submission was supported by Wellington Fish and Game Council and Masterton District Council. Greater Wellington staff note there are several methods of avoiding or mitigating adverse effects on the environment

from animal waste, and treatment is not always appropriate as this removes the nutrient value of the waste. Treatment and other mitigation responses are more appropriately assessed as part of the rules and consents processes for particular activities when the regional plan is reviewed.

Federated Farmers of New Zealand sought that the policy be amended to differentiate between point source and non-point source discharges. The submission was supported by Horticulture New Zealand and Anders Crofoot. Greater Wellington staff comment that the policy refers to the discharge of contaminants to land as specified in section 15(b) of the Resource Management Act and the discharge of contaminants to water as specified in section 15(a) of the Resource Management Act. The meaning of discharge relies on the definition of discharge that is provided in the Resource Management Act. Any distinction between point source and non-point source can be made when the regional plan is prepared, if such a distinction is needed. It is not recommended that any reference to point source discharge is needed in this policy.

Horticulture New Zealand sought that policy 15 be retained. The submission was supported by Anders Crofoot. Staff recommend retaining the policy as proposed.

Fonterra Co-operative Group Ltd supported the use of rules and methods that promote discharges to land rather than water. The support is noted.

Masterton District Council requested the word ‘promote’ be replaced with ‘encourage and consider’. Greater Wellington staff note that the words promote and encourage are synonyms, so the retention of the word promote would maintain consistency with other policies that promote certain issues rather than require them.

John Charles and Mary McGuinness requested the term ‘collective’ be removed from Policy 15(b) and the second paragraph of the explanation be deleted. Greater Wellington staff are of the opinion that collective systems are more beneficial where feasible, so should be promoted. Alternatives will be considered where collective systems are shown not to be feasible.

Porirua City Council sought that the policy be retained. Staff recommend retaining the policy as proposed.

South Wairarapa District Council requested Policy 15(b) be amended to ‘promote the use of collective sewerage treatment systems where feasible.’ Greater Wellington staff agree that collective systems will be beneficial where feasible, but note that the decision on whether a system is feasible is made during the planning process.

Upper Hutt City Council requested Policy 15(b) be amended to ‘promote, where practical and acceptable to the territorial authority concerned, the use of collective...’ Greater Wellington staff agree that collective systems will be beneficial where practical, but note that the decision on whether a system is practical is made during the planning process.

Watersmart Ltd requested Policy 15 include promotion of greywater re-use for irrigation purposes. The submission was supported by Craig Brown. Greater Wellington staff note that policy 15 is to promote discharge to land rather than discharge to water. Promotion of water recycling and reuse is provided for in policies 44 and 65.

Wellington City Council supported policy 15. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Department of Conservation	31/12	Reject
Federated Farmers of New Zealand	35/35	Reject
Horticulture New Zealand	50/54	Accept
Fonterra Co-operative Group Ltd	36/3	Accept
Masterton District Council	74/12	Reject
John Charles and Mary McGuinness	75/1	Reject
Porirua City Council	100/16	Accept
South Wairarapa District Council	112/22	Reject
Upper Hutt City Council	125/5	Reject
Watersmart Ltd	129/1	Reject
Wellington City Council	131/84	Accept

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

No change is recommended to policy 15.

2.90 Policy 16: Protecting aquatic ecological function of water bodies - regional plans

Submitter	Submission	Summary
Anders Crofoot	25/12	Stated that policy 16(f) was not sufficiently clear as to whether ephemeral streams are included. Ephemeral streams should not be included, and there should be a size threshold for wetlands to be included as well.
Department of Conservation	31/13	Stated that retaining the natural features of water bodies promotes the retention of both habitat diversity and ecological function. While the terms habitat diversity and ecological function are related and essentially complementary they are not synonymous. The protection of the aquatic ecological function of water bodies requires that indigenous animals are also prevented from being removed or destroyed. Sought the following decision from the Council: policy 15(a) be replaced with the following wording: "promote the retention of in-stream habitat diversity and ecological function by retaining natural features of water bodies – such as pools, runs, riffles, and the river's natural form;" and that clause (h) be replaced with the following wording: "prevent the removal or destruction of indigenous plants or animals in water bodies; and"
F1/12	Winstone Aggregates	Oppose
F10/6	Wellington Fish and Game Council	Support
F24/10	Masterton District Council	Oppose
Federated Farmers of New Zealand	35/36	Sought: <ol style="list-style-type: none"> 1. Clause (d) be amended as follows: <ul style="list-style-type: none"> (d) promote the installation of water storage including online dams with appropriate mitigation techniques. 2. Clause (f) be amended as follows: <ul style="list-style-type: none"> (f) promote best practice guidelines in relation to stock access to rivers, lakes and wetlands
F19/37	Horticulture New Zealand	Support

Submitter	Submission	Summary
F22/667	Anders Crofoot	Support
F24/46	Masterton District Council	Support
Fonterra Co-operative Group Ltd	36/4	Supported actions to prevent stock access to rivers, lakes and wetlands where such access causes adverse environmental impacts. Requested that 1) method 35 be the initial approach taken to achieve this; and 2) the range of water ways etc from which stock are to be excluded are defined following consideration of the balancing of desired environmental benefits with the costs to the land owner and practicality of achievement
F23/51	Federated Farmers of New Zealand	Support
Horticulture New Zealand	50/66	Sought that policy 16 be amended as follows: d) promote the installation of off line dams over instream dams or provide a mitigation option. h) discourage the removal or destruction of wetland plants in wetlands And, amend the explanation to include mitigation options for instream dams
F22/68	Anders Crofoot	Support
Kapiti Coast District Council	56/24	Supported policy 16, but sought that the policy be improved by including a regional rule and/or methods in regional plans to require hydraulic neutrality for all new subdivision and developments.
F1/49	Winstone Aggregates	Oppose
F17/39	Meridian Energy Limited	Oppose
F24/63	Masterton District Council	Support in part
Lower Hutt Forest and Bird Protection Society	66/4	Supported policy 16. Requested amending paragraph (i) to read 'Maintain fish passage and mitigate the effect of existing fish pass impediments in waterways'.

Submitter	Submission	Summary
F1/51	Winstone Aggregates	Oppose
Masterton District Council	74/13	Sought that policy 16 uses the words 'encourage and consider', instead of 'promote'.
Meridian Energy Limited	82/20	Sought deletion of sub-clause (d) and make consequential amendments to the explanation.
F23/52	Federated Farmers of New Zealand	Support in part
F24/85	Masterton District Council	Support
New Zealand Historic Places Trust	87/15	Sought retention of policy 16.
Porirua City Council	100/17	Supported policy 16.
F12/16	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support
The Hutt Valley Angling Club	118/1	Sought control of vehicle access to rivers, lakes and wetlands
TrustPower Limited	124/23	Sought that the policy be amended by adding a new sub-clause to read: '(g) recognise that some disturbance to waterbodies may be appropriate, particularly in developing new regionally significant infrastructure including renewable energy developments' Also sought that the explanation be amended by adding 'While disturbances to waterbodies should be discouraged, some disturbances may be appropriate if they are required for the development of regionally significant infrastructure and are designed to avoid, remedy and mitigate any actual or potential adverse effects of waterbodies including their ecological

Submitter	Submission	Summary
		function.'
F1/92	Winstone Aggregates	Support
F4/6	Transpower New Zealand Limited	Support
F5/24	PowerCo Limited	Support
F7/6	Oil Companies	Support
F17/40	Meridian Energy Limited	Support
F24/113	Masterton District Council	Support
F26/39	Mighty River Power	Support
Wellington City Council	131/85	Supported policy 16.

(a) Discussion

Anders Crofoot stated that policy 16(f) was not sufficiently clear as to whether ephemeral streams are included and ephemeral streams should not be included. Greater Wellington staff note that clause 6(f) includes rivers, which are defined under the Resource Management Act:

River means a continually or intermittently flowing body of fresh water; and includes a stream and modified watercourse; but does not include any artificial watercourse (including an irrigation canal, water supply race, canal for the supply of water for electricity power generation, and farm drainage canal).

This means intermittently flowing rivers (or streams) are included in policy 16(f). However, the definition refers to a flowing body of water, which means that intermittently flowing rivers are only included when they are flowing. In other words, stock access is to be prevented from flowing water.

Anders Crofoot also stated there should be a size threshold for wetlands. Greater Wellington staff comment that if a size threshold for wetlands is to be included in policies, rules and/or rules of the regional

plan, it will be appropriate to decide this at the time the regional plan is prepared.

Department of Conservation sought policy 15(a) be replaced with the following wording:

“promote the retention of in-stream habitat diversity and ecological function by retaining natural features of water bodies – such as pools, runs, riffles, and the river’s natural form;”. Greater Wellington staff note that all the clauses in policy 16 are directed at protecting ecological function of water bodies. It is also the outcome in objective 13, which implementation of the policy is aiming to achieve. It is not considered that addition of the reference into an individual clause will help. The Department of Conservation also sought that clause (h) be replaced with the following wording: “prevent the removal or destruction of indigenous plants or animals in water bodies; and”. Greater Wellington staff note that some indigenous animals are allowed to be taken from water bodies by law (e.g., whitebait, commercial fishing of eels) and preventing removal would be inconsistent with this. The submission of the Department of Conservation was supported by Wellington Fish and Game Council and opposed by Winstone Aggregates and Federated Farmers of New Zealand.

Federated Farmers of New Zealand sought clause (d) be amended to promote the installation of water storage including on-line dams with appropriate mitigation techniques. Greater Wellington staff do not support such an addition to the policy because promoting on-line dams in the provisions of regional plans will not necessarily always be consistent with protecting healthy functioning aquatic ecosystems. Federated Farmers of New Zealand also sought (f) be amended to promote best practice guidelines in relation to stock access to rivers, lakes and wetlands. Greater Wellington is already developing such guidelines with industry and landowners and a policy to that effect is not needed in the Regional Policy Statement. However, it will be helpful to include a policy that sets out what the guidelines are trying to do. The guidelines are not aiming to “prevent” stock access because that is not realistic or achievable through a policy directed at the regional plan. Greater Wellington staff recommend that in clause (f), “prevent” be changed to “discourage”. The submission of Federated Farmers of New Zealand was supported by Anders Crofoot, Horticulture New Zealand and Masterton District Council.

Fonterra Co-operative Group Ltd supported actions to prevent stock access and requested that method 35 be the initial approach taken to achieve this and that the range of water ways etc., from which stock are to be excluded are defined following consideration of the balancing of desired environmental benefits with the costs to the land owner and practicality of achievement. The submission was supported by Federated Farmers of New Zealand. Greater Wellington staff note that guidelines for stock access are already being developed with

industry and landowners. These guidelines will influence what is to be done in the regional plan. It is noted that “preventing” stock access is not realistic or achievable through a policy directed at the regional plan. Greater Wellington staff therefore recommend that clause (f) and the word “prevent” be changed to “discourage”.

Horticulture New Zealand sought that policy 16 be amended to promote the installation of off line dams over instream dams or provide a mitigation option. Greater Wellington staff comment that the Resource Management Act requires adverse effects on the environment to be avoided, remedied or mitigated in section 5(2)(c). It is not necessary to repeat what the Act requires in the Regional Policy Statement for the Wellington region. The submitter also sought an amendment to the explanation. Since a change to the policy is not recommended, it is not necessary to amend the explanation. Horticulture New Zealand also sought policy 16 be changed to “discourage” the removal or destruction of wetland plants in wetlands. Greater Wellington staff comment that wetlands are one of the region’s ecosystems that have been significantly reduced in extent – 2.5% of the original extent of wetlands in the region remain – and it is important that an emphasis be placed on “preventing” further reductions. No change is recommended in response to the submission. The submission of Horticulture New Zealand was supported by Anders Crofoot.

Kapiti Coast District Council supported policy 16 but sought that the policy be improved by including a regional rule and/or methods in regional plans to require hydraulic neutrality for all new subdivision and developments. The submission was supported in part by Masterton District Council and opposed by Winstone Aggregates and Meridian Energy. Greater Wellington staff note that clause (b) is aimed at achieving hydraulic neutrality in the context of the regional plan. It is considered that hydraulic neutrality in relation to new subdivision and development is best achieved through controlling land use and policy 41 which includes more specific provisions on how this can be achieved.

Lower Hutt Forest and Bird Protection Society requested amending paragraph (i) to read ‘Maintain fish passage and mitigate the effect of existing fish pass impediments in waterways’. The submission was opposed by Winstone Aggregates. Greater Wellington staff note that regional plans do not have the ability to regulate existing fish pass impediments in waterways, which means that such an approach to existing structures lies with the non-regulatory policies of the Regional Policy Statement. Policy 64 is to support environmental enhancement initiatives and it is appropriate to mention fish passage enhancement in the explanation this policy.

Masterton District Council sought that policy 16 uses the words ‘encourage and consider’, instead of ‘promote’. The submission was supported by Federated Farmers of New Zealand and Masterton

District Council. Greater Wellington staff note that the words promote and encourage are synonyms, so the retention of the word promote would maintain consistency with other policies that promote certain issues rather than require them.

Meridian Energy sought deletion of sub-clause (d) because it assumes all in-stream storage is undesirable or inappropriate, and make consequential amendments to the explanation. Greater Wellington staff comment that the Regional Policy Statement makes no assumption that all in-stream storage is undesirable but it does promote off-line storage over in-stream storage because there is little potential for adverse effects on rivers.

New Zealand Historic Places Trust sought retention of policy 16. Staff have recommended retaining the policy with an amendment in response to other submissions.

Porirua City Council supported policy 16. The support is noted.

The Hutt Valley Angling Club Inc sought control of vehicle access to rivers, lakes and wetlands. Greater Wellington staff note that control of vehicle access within rivers and lakes is a matter to be decided when regional plans are prepared. The Resource Management Act specifically directs in section 13(2) that “ *... no person may ... enter or pass across bed of any river or lake ... in a manner that contravenes a rule in a regional plan ...* ”. Particular regard must be given to policy 52 of the Regional Policy Statement when considering rules about access in regional plans. The Resource Management Act makes no mention of access to wetlands and it is a matter that landowners control entirely.

TrustPower Limited sought that the policy be amended by adding a new sub-clause recognising that some disturbance to waterbodies may be appropriate, particularly in developing new regionally significant infrastructure including renewable energy developments. Greater Wellington staff note that policy 16 identifies a number of matters that will be “promoted”, “discouraged” etc., but it makes no comment on what level of disturbance is appropriate or not. Policy 6 provides for the recognition of the benefits from regionally significant infrastructure and policy 7 provides for the protection of regionally significant infrastructure. It is unnecessary to repeat these policies in the context of policy 16. TrustPower Limited also sought that the explanation be amended to reflect the change suggested and by referring to regionally significant infrastructure designed to avoid, remedy and mitigate any actual or potential adverse effects of water bodies, including their ecological function. Greater Wellington staff comment that an addition to the explanation isn’t needed because the change to policy is not recommended and the requirement to avoid, remedy or mitigate is already required by the Resource Management Act and does not need to be repeated in an explanation to a policy. The submission by TrustPower Limited was supported by Winstone

Aggregates, Transpower New Zealand Limited, PowerCo, Oil Companies, Meridian Energy, Masterton District Council and Mighty River Power.

Wellington City Council supported policy 16. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Anders Crofoot	25/12	Reject
Department of Conservation	31/13	Reject
Federated Farmers of New Zealand	35/36	Accept in part
Fonterra Co-operative Group Ltd	36/4	Accept in part
Horticulture New Zealand	50/66	Reject
Kapiti Coast District Council	56/24	Reject
Lower Hutt Forest and Bird Protection Society	66/4	Accept in part
Masterton District Council	74/13	Reject
Meridian Energy Limited	82/20	Reject
New Zealand Historic Places Trust	87/15	Accept in part
Porirua City Council	100/17	Accept
The Hutt Valley Angling Club	118/1	Reject
TrustPower Limited	124/23	Reject
Wellington City Council	131/85	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend policy 16 as follows:

Policy 16: Protecting aquatic ecological function of water bodies – regional plans

Regional plans shall include policies, rules and/or methods that:

- (a) promote the retention of in-stream habitat diversity by retaining natural features - such as pools, runs, riffles, and the river's natural form;
- (b) promote the retention of natural flow regimes – such as flushing flows;
- (c) promote the protection and reinstatement of riparian habitat;
- (d) promote the installation of off-line water storage over dams in river beds;
- (e) discourage the reclamation, piping, straightening or concrete lining of rivers;
- (f) ~~prevent~~ discourage stock access to rivers, lakes and wetlands;
- (g) discourage the diversion of water into or from wetlands – unless the diversion is necessary to restore the hydrological variation to the wetland;
- (h) prevent the removal or destruction of indigenous plants in wetlands and lakes; and
- (i) maintain fish passage.

2.91 Policy 17: Protecting significant values of rivers and lakes - regional plans

Submitter	Submission	Summary
Department of Conservation	31/14	Sought that the policy be retained as proposed.
F24/11	Masterton District Council	Oppose
Federated Farmers of New Zealand	35/37	Sought that policy 17 be amended as follows: Regional plans shall include policies and rules that consider:
F19/38	Horticulture New Zealand	Support
F22/69	Anders Crofoot	Support
Friends of Owhiro Stream	38/3	Supported policy 17 in part. Considered it offered good protection to significant rivers and lakes as identified in Appendix 1 and strongly supported the inclusion of Owhiro Stream, along with comparable streams in the region (including urban streams).

Submitter	Submission	Summary
		<p>Owhiro Stream, although currently degraded in some respects, is the only natural stream flowing to urban Wellington's south coast and the Taputeranga Marine Reserve.</p> <p>Stated that policy 17 was also deficient in that it only recognised the natural values of the identified lakes and rivers. Sought policy 17 be amended to:</p> <p>"Regional plans shall include policies and rules that protect:</p> <ul style="list-style-type: none"> (a) significant amenity and recreational values, including those associated with the rivers and lakes listed in Appendix 1; and (b) significant indigenous ecosystem values, including those associated with the rivers and lakes listed in Appendix 1."
F19/39	Horticulture New Zealand	Oppose
Horticulture New Zealand	50/67	Sought that policy 17 be deleted or amended to "maintain values of rivers and streams"
F22/70	Anders Crofoot	Support
Meridian Energy Limited	82/21	<p>Sought policy 17 be amended as follows:</p> <p>'Regional plans shall include policies and rules that:</p> <ul style="list-style-type: none"> (a) Protect the significant indigenous ecosystems associated with the rivers and lakes listed in Appendix 1; and (b) Maintain and, where practicable, enhance the significant amenity and recreational values associated with the rivers and lakes listed in Appendix 1' <p>And sought consequential amendments to the explanation.</p>
F16/10	Genesis Energy	Support
Mighty River Power	83/25	Sought policy be amended to read: '...(b)... from inappropriate use and development.'
F1/73	Winstone Aggregates	Support
F23/53	Federated Farmers of New Zealand	Support

Submitter	Submission	Summary
Wellington City Council	131/86	Supported policy 17.
Wellington Fish and Game Council	133/23	Opposed. Sought deletion of word "significant".
F1/106	Winstone Aggregates	Oppose
F17/41	Meridian Energy Limited	Oppose
F24/129	Masterton District Council	Oppose

(a) Discussion

Federated Farmers of New Zealand sought that regional plans should “consider” rather than “protect” the matters in policy 17. Greater Wellington staff note that sections 6(c) and 7(c) of the Resource Management Act state that when preparing its regional policy statement Greater Wellington shall have particular regard to the maintenance and enhancement of amenity values (7(c)) and shall recognise and protect significant habitats of indigenous fauna (6(c)). Policy 17 states how Greater Wellington is implementing these parts of the Resource Management the Act in the Regional Policy Statement. A change is made to the wording of clause (b) of the policy to ensure a more direct link is made with section 6(c) of the Resource Management Act.

Federated Farmers of New Zealand also expressed concern over the lack of affected landowner involvement in the development of Appendix 1 and raised matters relating to consultation over the rivers listed and the vested interests in the groups surveyed over table 15. These concerns raised by Federated Farmers of New Zealand are addressed in response to submissions on Appendix 1 and Table 15. Federated Farmers of New Zealand was also concerned about the inclusion of small tributaries in Table 16 and this is addressed in their submission on Table 16. They also asked that an emphasis be placed on education and information. Greater Wellington staff agree and recommend that the policy be revised to refer to methods in regional plans, which provide for non-statutory approaches to be included. The submission of Federated Farmers of New Zealand was supported by Anders Crofoot and Horticulture New Zealand.

Meridian Energy, in relation to amenity and recreational values, sought an amendment to policy 17 that replaces “protection” with

“maintain and where possible enhance”. The submission was supported by Genesis Energy. A change to “maintain and enhance” is appropriate so that effect is given to section 7(c) of the Resource Management Act.

Mighty River Power sought an amendment to part (b) of policy 17 that adds “from inappropriate use and development”. Greater Wellington staff note the values identified in part (b) of policy 17 relate to section 6(c) of the Resource Management Act which states *all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance ... the protection of ... significant habitats of indigenous fauna ...*. No mention is made in section 6 (c) of “inappropriate use and development”. Hence it is not included in policy 17. Changes are made to the wording of the policy to ensure more direct links are made with section 6 of the Resource Management Act. The submission by Mighty River Power was supported by Winstone Aggregates and Federated Farmers of New Zealand.

Wellington Fish and Game Council sought deletion of word "significant". The submission was opposed by Winstone Aggregates, Meridian Energy and Masterton District Council. Greater Wellington staff recommend that the reference to significant be retained in the reference to Appendix 1 because the reference is specifically to listed rivers with significant identified values. Policy 17 has been amended to give effect to sections 6 (c) and 7 (c) of the Resource Management Act, generally.

Friends of Owhiro Stream supported policy 17 but sought a change that recognises rivers may have the values applied to rivers in Appendix 1 but these values have not yet been looked for or identified. The submission was opposed by Horticulture New Zealand. Greater Wellington staff note that policy 17 implements sections 6(c) and 7(c) of the Resource Management Act as mentioned in the discussion, above, in response to other submitters. It is appropriate to bring the policy more in line with these sections of the Act by making changes suggested by the submitter.

Horticulture New Zealand sought that policy 17 be deleted or amended to “maintain values of rivers and streams”. The submission was supported by Anders Crofoot. Greater Wellington staff note that sections 6(c) and 7(c) of the Resource Management Act state that when preparing its regional policy statement Greater Wellington shall have particular regard to the maintenance and enhancement of amenity values (7(c)) and shall recognise and protect significant habitats of indigenous fauna (6(c)). Policy 17 states how Greater Wellington is implementing these parts of the Resource Management Act in the Regional Policy Statement. Changes are made to the

wording of the policy to ensure more direct links are made with section 6 of the Resource Management Act.

Department of Conservation sought that the policy be retained as proposed. Their submission was opposed by Masterton District Council. **Wellington City Council** supported policy 17. The support is noted. Staff have recommended retaining the policy with amendments in response to other submissions.

(b) Recommended decision

Submitter	Submission	Recommendation
Department of Conservation	31/14	Accept in part
Federated Farmers of New Zealand	35/37	Accept in part See also recommendations on Appendix 1 and Tables 15 and 16
Friends of Owhiro Stream	38/3	Accept in part
Horticulture New Zealand	50/67	Accept in part
Meridian Energy Limited	82/21	Accept in part
Mighty River Power	83/25	Reject
Wellington City Council	131/86	Accept in part
Wellington Fish and Game Council	133/23	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Amend policy 17 and its explanation as follows:

Policy 17: Protecting significant values of rivers and lakes – regional plans

Regional plans shall include policies, ~~and~~ rules and/or methods that ~~protect~~:

- (a) Maintain or enhance the ~~significant~~ amenity and recreational values ~~of associated with the~~ rivers and lakes, including significant amenity and recreational values of rivers and lakes listed in Table 15 of Appendix 1; and
- (b) Protect the significant indigenous ecosystems and habitats with significant indigenous biodiversity values of associated with the rivers and lakes, including rivers and lakes listed in Table 16 of Appendix 1.

Explanation

...

The rivers and lakes with significant indigenous ecosystems and habitats with significant indigenous biodiversity values were selected using indicators of aquatic invertebrate community health, the diversity of indigenous migratory fish species, the presence of nationally threatened fish species and the location of inanga spawning habitat. The criteria used to assess rivers and lakes with significant indigenous ecosystems are explained underneath Table 16 in Appendix 1.

2.92 Policy 18: Using water efficiently - regional plans

Submitter	Submission	Summary
Craig Brown	17/1	Sought the following: 'Insert c) promote the recycling of water, especially on-site; Insert d) promote the capture of rainwater on-site; Insert into Explanation: The capture of rainwater on-site reduces demand for centralised infrastructure for water provision. The recycling of water on-site reduces demand for centralised infrastructure for water provision and for wastewater treatment. On-site water systems usually have lower life cycle costs (both financial and environmental) than centralised water systems, comparable or reduced risks and greater resilience.
F13/37	Wellington International Airport Limited	Support
Department of Conservation	31/15	Sought that the policy be retained as proposed.
F10/7	Wellington Fish and Game Council	Support
F24/12	Masterton District Council	Oppose
Federated Farmers of New Zealand	35/38	Sought that policy 18 be retained as proposed.
F22/71	Anders Crofoot	Support

Submitter	Submission	Summary
F24/47	Masterton District Council	Support
Fonterra Co-operative Group Ltd	36/5	Supported the promotion of the efficient use of water
F19/40	Horticulture New Zealand	Support in part
Horticulture New Zealand	50/55	Sought that policy 18(b) include on line dams with appropriate mitigation techniques.
F22/72	Anders Crofoot	Support
F24/59	Masterton District Council	Support
Kapiti Coast District Council	56/25	Supported the intention of policy 18 (using water efficiently)
Masterton District Council	74/14	Sought that policy 18 use the words 'encourage and consider', instead of 'promote'.
TrustPower Limited	124/24	Sought that the explanation be amended by adding 'Non consumptive uses of water shall be recognised in Regional Plans as efficient uses, as water is able to be reallocated for a future use.'
F1/93	Winstone Aggregates	Support
F26/40	Mighty River Power	Support
Wairarapa Regional Irrigation Trust	127/7	Strongly supported this policy.
Watersmart Ltd	129/2	Sought the following changes to policy 18 of the Regional Policy Statement by adding: (c) promote greywater re-use for irrigation purposes
F2/2	Craig Brown	Support
Wellington City Council	131/87	Supported policy 18.

(a) Discussion

Craig Brown sought insertion of “c) promote the recycling of water, especially on-site; and d) promote the capture of rainwater onsite. The submission was supported by Wellington International Airport Limited. Greater Wellington staff comment that policy 18 is directed at the efficiency of activities such as irrigation that require resource consents from Greater Wellington to take water from rivers, lakes or groundwater. Capturing rainwater and recycling water on site are not activities that usually require resource consents from Greater Wellington but they are activities that might be included as conditions on resource consents in relation to land use and subdivision. Hence the matters raised by the submitter are addressed in policy 44 of the Regional Policy Statement, which city and district councils must have particular regard to. Policy 65 also addresses non-regulatory approaches to efficient water use. Craig Brown also asks for material to be included in the explanation relating to centralised water systems. Once again Greater Wellington staff consider these are matters that fall within policy 44. It will be up to city and district council to promote reduced centralisation of water supply systems or not. It is not recommended the submission be adopted.

Department of Conservation sought that the policy be retained as proposed. The submission was supported by Wellington Fish and Game Council and opposed by Masterton District Council. Staff have recommended consequential amendments in response to submissions on sections 3.4 and 3.8.

Federated Farmers of New Zealand sought that the policy be retained as proposed. The submission was supported by Anders Crofoot and Masterton District Council. Staff have recommended consequential amendments in response to submissions on sections 3.4 and 3.8.

Horticulture New Zealand sought that policy 18(b) include on line dams with appropriate mitigation techniques. The submission of Horticulture New Zealand was supported by Anders Crofoot. Greater Wellington staff note that policy 18 is about using water efficiently and does not address mitigation of the effects of structures on water bodies. It is not recommended the submission be adopted.

Fonterra Co-operative Group Ltd supported the promotion of the efficient use of water. The submission was supported by Horticulture New Zealand. The support is noted.

Kapiti Coast District Council supported the intention of policy 18 (using water efficiently). The support is noted.

Masterton District Council sought that policy 18 use the words 'encourage and consider', instead of 'promote'. Greater Wellington staff note that the words promote and encourage are synonyms, so the

retention of the word promote would maintain consistency with other policies that promote certain issues rather than require them.

TrustPower Limited sought that the explanation be amended by adding ‘Non consumptive uses of water shall be recognised in Regional Plans as efficient uses, as water is able to be reallocated for a future use.’ The submission was supported by Winstone Aggregates and Mighty River Power. Greater Wellington Staff comment that the status of consumptive or non-consumptive uses of water and definitions surrounding them is not addressed in the Regional Policy Statement. The intent of the policy is to promote efficient use of water and any approaches relating to water use can be the subject of regional plan provisions.

Wairarapa Regional Irrigation Trust strongly supported this policy. The support is noted.

Watersmart Ltd sought addition of (c) promote greywater re-use for irrigation purposes. The submission was supported by Craig Brown. Greater Wellington staff comment that policy 18 is directed at the efficiency of activities such as irrigation that require resource consents to take water from rivers, lakes or groundwater. Capturing greywater and using it for irrigation is not an activity that requires resource consents but capturing and reusing greywater may be able to be included as conditions on resource consents for land use and subdivision. Hence they are matters addressed in policy 44 of the Regional Policy Statement, which city and district councils must have particular regard to. Policy 65 also addresses non-regulatory approaches to efficient water use.

Wellington City Council supported policy 18. Their support is noted.

(b) Recommended decision

Submitter	Submission	Recommendation
Craig Brown	17/1	Reject
Department of Conservation	31/15	Accept in part
Federated Farmers of New Zealand	35/38	Accept
Fonterra Co-operative Group Ltd	36/5	Accept
Horticulture New Zealand	50/55	Reject
Kapiti Coast District Council	56/25	Accept

Submitter	Submission	Recommendation
Kapiti Coast District Council	56/26	Accept
Masterton District Council	74/14	Reject
TrustPower Limited	124/24	Reject
Wairarapa Regional Irrigation Trust	127/7	Accept
Watersmart Ltd	129/2	Reject
Wellington City Council	131/87	Accept in part

All further submissions are accepted or rejected accordingly.

(c) Recommended changes

Make the following changes to policy 18 as a consequence of submissions on sections 3.4 (Masterton District Council) and 3.8 (Wairarapa Regional Irrigation Trust).

Policy 18: Using water efficiently – regional plans

Regional plans shall include policies, rules and/or methods that:

- (a) promote the efficient use of water; and
- (b) promote water harvesting, including off-line water storage and the augmentation of river flows.

Explanation

Using water efficiently and *water harvesting* when it is in abundant supply will make more water available when there is a shortage. Efficient use means minimising water wastage during the abstraction, distribution and final use of the water.

Water harvesting means taking and storing water from water bodies when the availability is high and using it when there is a water shortage. Augmentation of river flows in the context of using water efficiently refers to the release of stored water into a river during times of low flow with the intention of making it available for use elsewhere in the catchment.

2.93 Policy 19: Prioritising water abstraction for the health needs of people - regional plans

Submitter	Submission	Summary
Department of Conservation	31/16	Sought that the policy be retained as proposed.
F10/8	Wellington Fish and Game Council	Support
Federated Farmers of New Zealand	35/39	Sought policy 19 be amended to require Demand Management Plans as a compulsory condition of any municipal abstraction consent and that points (b) and (c) be deleted.
F22/73	Anders Crofoot	Support
F24/48	Masterton District Council	Oppose
Fonterra Co-operative Group Ltd	36/6	Sought clarity that this policy provides equal priority for water takes for public water supply as that held by qualifying Section 14 (3) water takes and does not provide greater priority for such a take
F19/41	Horticulture New Zealand	Support in part
F23/54	Federated Farmers of New Zealand	Support
Horticulture New Zealand	50/25	Sought amendment to policy 19 to include efficient and reasonable use of water for community and public water supply
F22/74	Anders Crofoot	Support
F24/60	Masterton District Council	Oppose
Kapiti Coast District Council	56/27	Supported the intention of policy 19 (prioritising water use)

Submitter	Submission	Summary
Meridian Energy Limited	82/22	Request relocation to follow from either amended objective 12 or 14 which addresses the value of water for use and development.
F24/78	Masterton District Council	Support
Meridian Energy Limited	82/23	Sought that policy 19 be amended as follows: "Policy 19: Enabling water abstraction for the health needs of people – regional plans Regional plans shall include policies and/or rules that ensure the allocation of water from any river or groundwater source provides sufficiently for the abstraction of water to meet the reasonably foreseeable future health needs of people, including...' And sought consequential amendments to the explanation to be more in line with section 14 of the Resource Management Act 1991.
F8/21	TrustPower Limited	Support in part
F16/11	Genesis Energy	Support
F24/86	Masterton District Council	Support
F26/17	Mighty River Power	Support
Mighty River Power	83/26	Sought retention in its entirety.
Porirua City Council	100/6	Strongly supported policy 19's prioritisation of water abstraction for the health needs of people, and sought that the policy be retained in its current form.
F12/17	Kiwi Income Property Trust, Kiwi Income Properties Ltd, Kiwi Properties Management Ltd	Support

Submitter	Submission	Summary
The Energy Efficiency and Conservation Authority	117/15	<p>Sought the following amendments to policy 19: “Policy 19: Prioritising water abstraction for the health and wellbeing of people and communities – regional plans Regional plans shall include policies and/or rules that give priority to the abstraction of water for the health and wellbeing of people and communities including:</p> <ul style="list-style-type: none"> (a) the taking of water by any statutory authority that has a duty for public water supply under any Act of Parliament; (b) the taking of water for reticulation into a public water supply network; (c) the taking of water for domestic and community supplies; and (d) the taking of water for the use and development of renewable energy.” <p>“Explanation There is potential for small scale hydro energy generation in the region to enable people and communities to provide for their social, economic and cultural wellbeing.”</p>
F8/20	TrustPower Limited	Support in part
F26/27	Mighty River Power	Support
The Hutt Valley Angling Club Inc	119/1	<p>Sought the deletion of (a) and (b) in policy 19 and that it be clearer that the taking of water, by entities that do so under statutory authority, should indeed be subject to the proviso that there are no adverse effects on the environment, and also that the choice made for any bulk water supply is specifically accepted as one that requires an evaluation of alternatives and has regard to all the other provisions of the Regional Policy Statement and complying regional plans; and there should be no special reference to or analogy with a water supply for individual property owners. Stated that if community supplies are to get special treatment, these need to be defined as communities that rely on a local water supply and not on a metropolitan or regional supply.</p>
TrustPower Limited	124/25	<p>Sought a new sub-clause to read: ‘(d) the taking of water for regionally significant infrastructure, particularly where it is non-consumptive.’</p> <p>Also sought the explanation be amended to read: ‘...This policy gives the same priority to the abstraction of water by public authorities for public</p>

Submitter	Submission	Summary
		water supply over other takes of water. This policy also includes a priority for regionally significant infrastructure, particularly where it is non-consumptive (such as hydroelectricity generation) above other takes of water. Non consumptive uses of water shall be recognised in Regional Plans as efficient uses, as water is able to be reallocated for a future use.'
F1/94	Winstone Aggregates	Support
F5/27	PowerCo Limited	Support
F24/114	Masterton District Council	Support
F26/41	Mighty River Power	Support
Wellington City Council	131/88	Supported policy 19.

(a) Discussion

Department of Conservation sought that the policy be retained as proposed. The submission was supported by Wellington Fish and Game Council. Staff have recommended retaining the policy but note relocation is recommended.

Federated Farmers of New Zealand sought policy 19 be amended to require Demand Management Plans as a compulsory condition of any municipal abstraction consent and that points (b) and (c) be deleted. Greater Wellington staff comment that policy 19 identifies priorities for water use in the region to be given effect to in the regional plan, not resource consent requirements. Resource consenting for managing water takes to ensure efficient use is addressed in policy 43 and requires particular regard to be given to demand management. It is recommended that clauses (b) and (c) be retained because of the priority that water has for people's health needs. The submission of Federated Farmers of New Zealand was supported by Anders Crofoot and opposed by Masterton District Council.

Fonterra Co-operative Group Ltd sought clarity that the policy provided equal priority for water takes for public water supply as that held by qualifying Section 14 (3) water takes and does not provide greater priority for such a take. The submission was supported by Federated Farmers of New Zealand and Horticulture New Zealand. Greater Wellington staff consider that any requirement of the

Resource Management Act has primacy over what is in the Regional Policy Statement. Therefore, the requirements of section 14(3) would provide a greater priority than policy in the Regional Policy Statement. However, as this is a matter of case law, it is not appropriate to include further comment in the Regional Policy Statement.

Horticulture New Zealand sought amendment to policy 19 to include efficient and reasonable use of water for community and public water supply. The submission was supported by Anders Crofoot and Masterton District Council. Greater Wellington staff comment that policy 19 identifies the priorities for water use in the region. It does not refer to efficient use. Managing water takes to ensure efficient use is addressed in policies 18, 43 and 44.

Kapiti Coast District Council supported the intention of policy 19 (prioritising water use). The support is noted.

Meridian Energy requested relocation to follow from either amended objective 12 or 14 which addresses the value of water for use and development. The submission was supported by Masterton District Council. Greater Wellington staff agree that policy 19 is more closely linked to objective 12 than objective 14. Therefore, it should follow policy 15.

Meridian Energy sought that policy 19 be amended as follows:

‘Policy 19: Enabling water abstraction for the health needs of people – regional plans

Regional plans shall include policies and/or rules that ensure the allocation of water from any river or groundwater source provides sufficiently for the abstraction of water to meet the reasonably foreseeable future health needs of people, including...’. The submission was supported by TrustPower Limited, Genesis Energy, Masterton District Council and Mighty River Power. Greater Wellington staff comment that the intent of the policy must be read in the context of the objective that it is intended to achieve. Objective 12 includes meeting the reasonably foreseeable needs of future generations. Adding this statement into the policy is not needed or recommended.

Mighty River Power sought retention of the policy in its entirety. Staff have recommended retaining the policy but noted the recommended relocation.

Porirua City Council strongly supported policy 19's prioritisation of water abstraction for the health needs of people, and sought that the policy be retained in its current form. Staff have recommended retaining the policy but note the recommended relocation.

The Energy Efficiency and Conservation Authority sought an amendment to policy 19: “(d) the taking of water for the use and development of renewable energy.” The submission was supported by TrustPower Limited and Mighty River Power. Greater Wellington staff comment that the intent of the policy is to give priority to taking water for public supply over other uses because of the importance of water supply to public health needs. Water is an essential element that allows people to live. The benefits of renewable energy are identified in policy 6.

The Hutt Valley Angling Club Inc sought the deletion of (a) and (b) in policy 19. Greater Wellington staff consider that the importance of public water supply to public health warrants giving priority to the abstraction of water. The submitter raised a number of matters relevant to water taken for public water supply. In response to these matters, Greater Wellington staff note that like all other resource consent applications, adverse effects have to be avoided remedied or mitigated; evaluation of alternatives is required; particular regard has to be given to Regional Policy Statement policies (e.g. Policy 43); and regional plan rules have to be complied with.

TrustPower Limited sought a new sub-clause to read: ‘(d) the taking of water for regionally significant infrastructure, particularly where it is non-consumptive.’ Greater Wellington staff comment that the intent of the policy is to give priority to taking water for public supply over other uses because of the importance of water supply to public health needs. Water is an essential element that allows people to live. The benefits of regionally significant infrastructure are identified in policy 6, and policy 7 provides it with protection. TrustPower Limited also sought changes to the explanation explaining the policy in relation to regionally significant infrastructure. Greater Wellington staff do not recommend including comments relating to regionally significant infrastructure in a policy about water take priorities, and no additional explanatory material is needed. The submission was supported by Winstone Aggregates, PowerCo Limited, Masterton District Council and Mighty River Power.

Wellington City Council supported policy 19. Their support is noted

(b) Recommended decision

Submitter	Submission	Recommendation
Department of Conservation	31/16	Accept
Federated Farmers of New Zealand	35/39	Reject
Fonterra Co-operative Group Ltd	36/6	Reject

Submitter	Submission	Recommendation
Horticulture New Zealand	50/25	Reject
Kapiti Coast District Council	56/27	Accept
Meridian Energy Limited	82/22	Accept
Meridian Energy Limited	82/23	Reject
Mighty River Power	83/26	Accept
Porirua City Council	100/6	Accept
The Energy Efficiency and Conservation Authority	117/15	Reject
The Hutt Valley Angling Club Inc	119/1	Reject
TrustPower Limited	124/25	Reject
Wellington City Council	131/88	Accept in part

All further submissions are accepted or rejected accordingly.

(c) **Recommended changes**

Reorder policy 19 of the Regional Policy Statement so that it follows policy 15, and any consequential changes to Table 4 and the numbering of policies.