Section 32 report
Evaluation of provisions

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

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Contents

Abbreviations and glossary

the Council or Greater Wellington	Wellington Regional Council also known as Greater Wellington Regional Council
Change 1	Proposed Change 1 to the RPS. Proposed Change 1 is the subject of this Section 32 report.
Climate change mitigation	A human intervention to reduce emissions or enhance the sinks of greenhouse gases. (Refer Intergovernmental Panel on Climate Change (IPCC)[1])
Climate change adaptation	In human systems, the process of adjustment to actual or expected climate and its effects, in order to moderate harm or exploit beneficial opportunities. In natural systems, the process of adjustment to actual climate and its effects; human intervention may facilitate adjustment to expected climate and its effects. (Refer IPCC)
Development capacity	The capacity of land to be developed for housing or for business use, based on: (a) the zoning, objectives, policies, rules, and overlays that apply in the relevant proposed and operative RMA planning documents; and (b) the provision of adequate development infrastructure to support the development of land for housing or business use. (Refer NPS-UD)
Healthy functioning state	Healthy functioning state refers to an ecosystem where the biophysical components (water quantity, water quality, habitat, aquatic life and ecological processes) are able to sustain the indigenous aquatic life expected for that type of ecosystem - that is intact in its physical, chemical, and biological components and their interrelationships, so that it is resilient to withstand change and stresses.
Ki uta ki tai (connectedness)	Managing natural and physical resources from the mountains to the sea, recognising they are interconnected and reliant upon one another. (Refer NRP)
Mana whakahaere	The power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, fresh water. (Refer NPS-FM)
Mahinga kai	Kai is safe to harvest and eat Kei te ora te mauri (the mauri of the place is intact)

[1] https://www.ipcc.ch/site/assets/uploads/sites/2/2019/06/SR15_AnnexI_Glossary.pdf

	(Refer NPS-FM, Appendix 1A compulsory value for mahinga kai)
Mana whenua / tangata whenua	Iwi or hapū who exercise customary authority in an identified area (Refer RMA Section 2)
Mātauranga Māori	Knowledge developed and/or adopted as part of the Māori knowledge continuum. (Refer NRP page 27) Māori knowledge - the body of knowledge originating from Māori ancestors, including the Māori world view and perspectives, Māori creativity and cultural practices (Te Aka Māori dictionary)
Mauri	An energy or life force that mana whenua / tangata whenua consider exists in all things in the natural world, including people. Mauri binds and animates all things in the physical world. Without mauri, mana cannot flow into a person or object (Refer NRP page 27)
NOF	National Objectives Framework
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-UD	National Policy Statement on Urban Development 2020
NZCPS	New Zealand Coastal Policy Statement 2010
NRP	Natural Resource Plan for the Wellington Region, operative 2022
Persistence	An ecological concept conveying the idea of an ecosystem not only surviving or continuing to exist, but being healthy enough to resist stresses and continue to function fully into the future. *For example, if remnant patches are too small, they can't support large enough populations to recover from random disturbances like droughts or floods.* (Refer Systematic conservation planning[2])
Protection or protect	To keep safe from harm, injury or damage. (Refer RF&BSNZ Inc v New Plymouth District Council [2015] NZEnvC 219)
RMA	Resource Management Act 1991
RPS	Regional Policy Statement for the Wellington Region
Tangata whenua	in relation to a particular area, means the iwi, or hapū, that holds mana whenua over that area (Refer RMA Section 2)
Te Mana o te Wai	As set out in clause 1.3 of the NPS-FM, and repeated in Appendix C – NPS-FM requirements addressed
Urban environment	Means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: *(i) is, or is intended to be, predominantly urban in character; and* *is, or*

[2] Margules CR and Pressey RL. 2000. Systematic conservation planning. *Nature* 405: 243-253

	is intended to be, part of a housing and labour market of at least 10,000 people. (Refer NPS-UD)
Wai ora	Water used for healing. (NRP page 340)
Wetland	Includes permanently or intermittently wet areas, shallow water, and land water margins that support a natural ecosystem of plants and animals that are adapted to wet conditions (Refer RMA Section 2)
Whaitua	The geographical area of a Whaitua Committee and Whaitua Implementation Programme. There are five whaitua in the region: Whanganui-a-Tara, Porirua, Kāpiti Coast, Ruamāhanga, Wairarapa Coast. The whaitua areas are shown in **Figure 1**.
WIP	Whaitua Implementation Programme
WRGF	The Wellington Regional Growth Framework is a spatial plan for the region developed in a partnership between central government, councils from the region and mana whenua / tangata whenua. (refer www.wrgf.co.nz)

1.0 INTRODUCTION

Why we have prepared this report

1. Greater Wellington Regional Council is proposing to amend the Regional Policy Statement (RPS) for the Wellington Region for the first time since the RPS became operative in 2013. The proposed amendments form RPS Proposed Change 1 ('**Change 1**').

2. In preparing Change 1, Greater Wellington Regional Council has considered the rationale for the changes, options for the changes, evaluated the efficiency and effectiveness of options, and involved partners and stakeholders in the process of the evaluation and drafting.

3. This report summarises the evaluation of the provisions, and the background and process information relevant to Change 1.

4. Section 32 of the Resource Management Act 1991 (RMA) sets out requirements for councils in evaluating proposed changes to policy statements and plans, and reporting on that evaluation[3]. This report is to meet Section 32.

5. The RPS must give effect to national policy statements. Although Section 32 has specific requirements for evaluating changes, this report is focused on evaluating aspects where there are options in how the RPS gives effect to national direction. Where an option (including the status quo current RPS) does not give effect to that national direction, it is not evaluated further in this report.

Why we are changing the RPS

6. Change 1 is to implement the National Policy Statement on Urban Development (NPS-UD) and National Policy Statement for Freshwater Management (NPS-FM) in the RPS. These NPS will also be implemented through regional plan and district plan changes.

7. The RPS integrates national direction in the regional context, and gives integrated direction to regional and district plans[4]. We are changing the RPS because:

    - There is recent national direction to implement and support including national direction in urban development (NPS-UD required to be implemented by August 2022), fresh water, biodiversity (NPS-IB is at exposure draft stage) and climate change
    - Implementation of the NPS-UD and NPS-FM needs to be done in an integrated management way. Urban development does not occur in isolation of managing natural and physical resources
    - The current RPS does not give effect to recent national direction.

8. The NPS-UD is a primary driver for undertaking Change 1 now as it requires changes to the RPS by 20 August 2022 to enable more urban development and housing intensification. The driver for the scope of Change 1 is all relevant national direction both NPS-UD, NPS-FM, and also other related national direction. it is important that inter-related issues are addressed at the same time[5].

What is covered in RPS Change 1

9. The key topics being addressed in Change 1 are:

    - Lack of urban development capacity and implementation of the NPS-UD in the RPS

[3] Section 32 is set out in full in Appendix A.
[4] All regional councils are required to have an RPS under the RMA
[5] The nature of the national direction and what it means for the RPS is described in Section 5.

- Degradation of fresh water and implementation of the NPS-FM in the RPS[6]
- Loss and degradation of indigenous biodiversity including regional policy to implement central government strategy and draft RMA national policy direction
- The impacts of climate change including regional policy to complement central government policy direction.

10. Change 1 also makes other minor amendments to align with recent updates to the Natural Resources Plan and national direction. Specifically changes related to natural character in the coastal environment and regionally significant infrastructure.

11. Provisions that are out of scope have not been reviewed, and are not evaluated in this document.

12. Change 1 is not intended to address all current topics or matters, rather, it is focused on recent national direction and related matters. Further changes to the RPS will be developed, including a further Change to be notified in 2024 to complete giving effect to the NPS-FM.

How to navigate this report

13. This report is structured in two parts with Part A providing the background and context for Change 1, and Part B providing the evaluation of the objectives and policy packages that are included in Change 1.

    Part A: Context and background, including:
    - Background and drivers for the change – Section 2
    - Methodology in Policy evaluation for Change 1, and key Processes informing Change 1 – Section 2
    - The Resource management issues addressed – Section 3
    - Partnership, engagement and outcomes during the process – Section 4 (also see Appendix D)
    - Regulatory and policy context – Section 5

    Part B: evaluation of the proposed change, including:
    - Approach to evaluation of the objectives and provisions including the regional context informing the evaluation – Section 6
    - Summary of preferred option – Section 7
    - Evaluation of appropriateness of objectives / purpose of changes – section 8
    - Evaluation of efficiency and effectiveness of the proposed policies and methods to achieve objectives – section 9.

14. This report refers to the proposed changes to the RPS throughout, and should be read in conjunction with the separate document setting out the proposed changes to the RPs provisions in full.

[6] Change 1 does not fully implement the NPS-FM. The NRP is the primary mechanism for implementing the full NPS and proposed changes will be notified in 2023-24. The RPS, as proposed to be amended in this Change 1 is focused on objectives/visions which the NPS directs to be included in the RPS.

PART A CONTEXT

15. Part A of this report sets out background, context, process, and defines the issues that the proposed changes focus on.

2.0 BACKGROUND

The purpose of the RPS

16. The RPS identifies the regionally significant issues for the management of the Region's natural and physical resources and sets out what needs to be achieved (objectives) and the way in which the objectives will be achieved (policies and methods).

17. The RPS implements national direction for the Wellington Region and directs subsidiary RMA documents – regional and district plans.

18. The current RPS for the Wellington region became operative on 24 April 2013 superseding the first 1995 RPS.

National direction as a primary driver for Change 1

19. Recent national policy statement direction has prompted these changes to the RPS and has been a primary influence on the scope, timing, processes and approach:

    - NPS-UD
    - NPS-FM.

20. The NPS-UD is a primary driver for the timeframe and undertaking Change 1 in 2022 as it requires changes to the Regional Policy Statement and District Plans by 20 August 2022, to enable more urban development and housing intensification. While that timeframe is specific to the NPS-UD, the driver for the scope of Change 1 is all relevant national direction both NPS-UD, NPS-FM, and also other related national direction. it is important that inter-related issues are addressed at the same time. Hence the scope of this Change 1.

21. Change 1 includes Te Mana o te Wai objective(s) for some whaitua and includes other related provisions needed to implement the NPS-FM in the Wellington Region. The NPS-FM requires Te mana o te Wai objectives to be embedded in the Regional Policy Statement by 2024. Objectives for other whaitua implementing the NPS-FM will be added later.

22. There is national direction, or draft national direction for indigenous biodiversity and climate change (refer Section 5.0, Resource Management Amendment Act 2020).

23. Although this is not in the form of an NPS, this legislative, draft NPS, and policy direction provides strong government guidance for the four aspects of Change 1 to be addressed with an integrated approach.

24. An outline of the regulatory and policy context, including the key content from NPS-UD and NPS-FM and other relevant national policy direction, is provided in Section 5.0. Further information on how both the NPS have been applied to Change 1 is in Appendix B – NPS-UD requirements addressed and Appendix C – NPS-FM requirements addressed.

Policy evaluation for Change 1

25. Section 32 of the RMA requires Greater Wellington Regional Council to prepare an evaluation report for a policy statement/plan change that sets out the process and results of what is proposed including:

- The extent to which the objectives are the most appropriate way to achieve the purpose of this Act; and
- Whether the provisions are the most appropriate way to achieve the objectives; and
- Contain a level of detail relevant to the effects that would result from implementation of the changes.

26. In examining whether the provisions are the most appropriate, section 32 is based on the identification and assessment of the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions. This includes consideration of economic growth or employment that may be provided or reduced. Benefits and costs are to be quantified, if practicable.

27. The assessment of the benefits and costs must also assess the risk of acting or not acting if there is uncertain or insufficient information.

28. The detailed requirements are provided in Appendix A – Section 32 RMA.

29. In identifying and assessing the proposed provisions, and other reasonable options, Greater Wellington Regional Council adopted a range of policy evaluation techniques. This included:

    - Partnership and engagement with external parties (refer Section 4.0) including informal briefings and feedback, structured engagement, and formal consultation under the Triennial Agreement
    - Workshops and testing with internal Greater Wellington Regional Council teams and specialists
    - Considering options and outcomes with Greater Wellington Regional Councillors in workshops and working groups.

30. Where proposals go further than current national direction, a greater level of technical analysis and testing with stakeholders was undertaken. Where proposals implement national direction, the policy direction in the RPS is expected and of lesser significance (marginal to the national direction), therefore the level of analysis is low.

31. In general, desk top analysis and qualitative assessment were the primary techniques used due to the time available from release of the NPS-UD and the date for the RPS change to be notified. The NPS-UD and NPS-FM were finalised and released in the second half of 2020. Greater Wellington Regional Council commenced a programme of work in response to the two NPS in early 2021, with the target notification date of August 2022 (as per NPS-UD).

32. Further information on the approach to policy evaluation for Change 1 is provided in Part B.

Processes informing Change 1

Statutory process

33. The relevant statutory processes for this RPS change are:

    - RMA Schedule 1 Preparation, change, and review of policy statements and plans Parts 1 to 3 ('the standard process')
    - RMA Schedule 1 Part 4 Freshwater Planning Process (the streamlined process for provisions related to freshwater management).

34. The approach to applying the Freshwater Planning Process under RMA Section 80A for the provisions in RPS Change 1, and background for this approach, is outlined in the table provided in Appendix E – Parts of RPS Change 1 subject to the Freshwater Planning Process. This also includes

justification at a provision level for those parts of RPS Change 1 that are notified as a freshwater planning instrument.

Natural Resources Plan and Whaitua Implementation Programmes in response to NPS-FM

35. The NPS-FM requires Council to include objective(s) in the RPS which describes what Te Mana o te Wai means in our region, and to develop freshwater visions, and include these in the RPS as objectives. These objectives have been, or are in the process of being, developed through a collaborative process with mana whenua / tangata whenua as part of the Whaitua Implementation Programme process, and subsequent specific engagements.

36. Successive governments have produced and updated the national policy statement for freshwater management. The NPS was first released in 2011, with additions in 2014, 2017 and a significant revision in 2020. The 2014 version introduced the 'national objectives framework' and put the onus on regional councils to develop objectives and limits in partnership with mana whenua / tangata whenua and communities. Transitioning to environmental limits will change the way RMA plans operate for land use, both rural and urban, stormwater management, wastewater management and how we use and manage fresh water.

37. The NPS-FM (and the 2020 revision in particular) is based on the concept of Te Mana o te Wai as its central pillar. This concept must flow through the RPS into both regional and district plans.

38. Greater Wellington Regional Council has responded to original (2014) NPS-FM with two major parallel regional planning processes. One process involved revising operative regional plans and moving them into a single regional plan, the Proposed Natural Resources Plan. This is in its final phase with appeals to the Environment Court resolved, and the plan in the process of becoming the fully operative Natural Resources Plan.

39. Development of the Proposed Natural Resources Plan and taking it through the standard Schedule 1 process, has resulted in an updated regional plan, noting that further amendments will occur over 2023 and 2024 to fully implement that NPS-FM 2020 (for example introducing limits). There are elements of the RPS to be brought into line with the outcomes of the completed Proposed Natural Resources Plan process.

40. The second process, the development of Whaitua Implementation Programmes (WIP), is also a direct response to the NPS-FM. There are five whaitua which collectively cover the geographical extent of the Wellington Region. Each whaitua has a Whaitua Committee tasked with developing a WIP to make decisions on the regulatory and non-regulatory proposals for the future of land and water management within that whaitua.

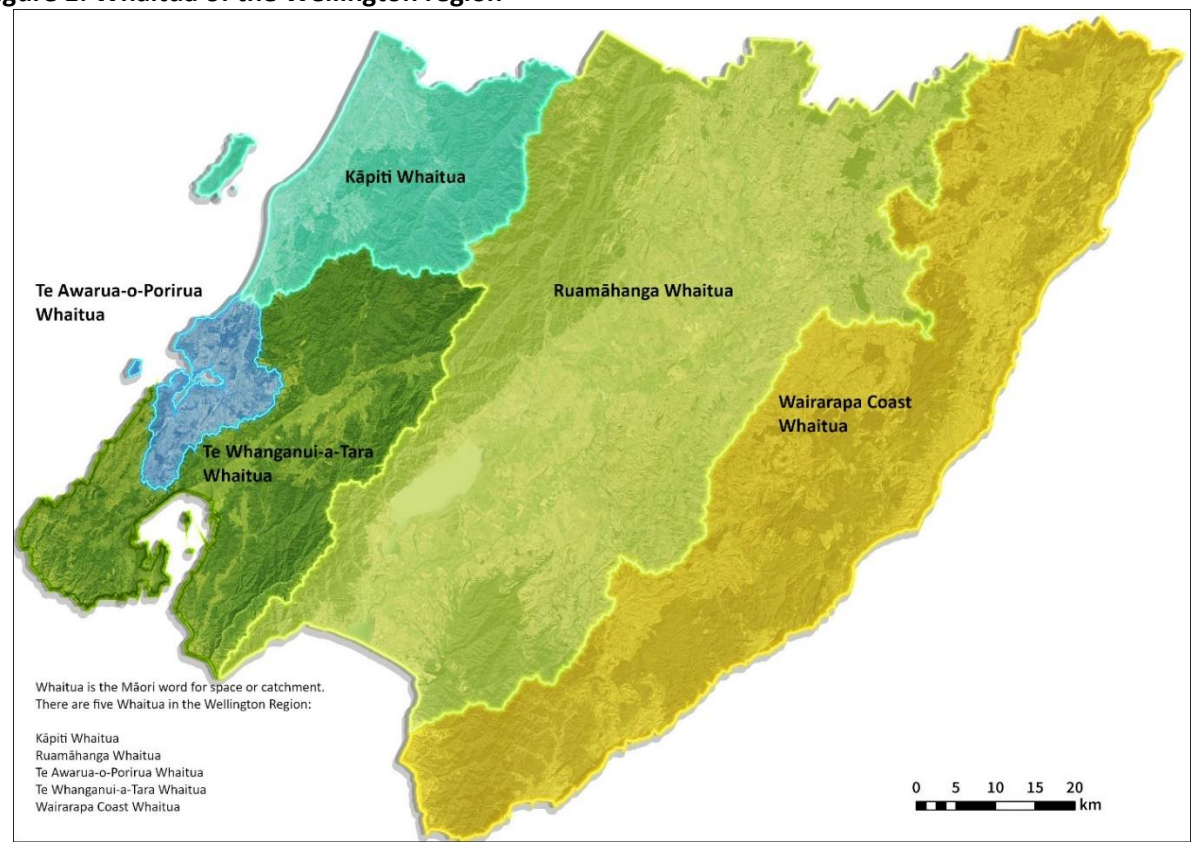
41. The WIP is to set resource limits and drive for place-based (whaitua) implementation in partnership with iwi and communities, providing a local response to the NPS-FM. The WIPs are completed for three whaitua, with two still in progress. Change 1 is to include freshwater visions (as objectives) for each whaitua (FMU). Changes to the Natural Resources Plan are also required to implement the recommendations in the completed WIP including recommendations about environmental limits. These plan changes must be notified by the end of 2024.

42. While the WIP process was in response to the NPS-FM, the process and outcomes have addressed broader resource management issues and recommended responses to inform Change 1 including urban development, indigenous ecosystems, and climate change.

43. The five whaitua are shown in Figure 1. The approach and documented reports endorsed for the whaitua include a process to define the issues, undertake modelling/scientific work to support the consideration of issues, and recommendations for identified objectives:

- Te Whaitua te Whanganui-a-Tara Implementation Programme, September 2021[7]
- Te Mahere Wai o Te Kāhui Taiao: A Mana Whenua implementation plan to return mana to our freshwater bodies8
- Te Awarua-o-Porirua Whaitua: Whaitua Implementation Programme, Te Awarua-o-Porirua Whaitua Committee, April 2019[9]
- Te Awarua-o-Porirua Whaitua Implementation Programme: Ngāti Toa Rangatira statement[10]
- Ruamāhanga Whaitua Implementation Programme, Ruamāhanga Whaitua Committee, August 2018[11].

Figure 1: Whaitua of the Wellington region



Wellington Regional Growth Framework

44. The Wellington Regional Growth Framework (WRGF) is a spatial plan that sets a long-term vision for changes and urban development in the Wellington Region[12]. The Framework was agreed upon by Greater Wellington Regional Council, territorial authorities, mana whenua / tangata whenua and central government agencies. A series of objectives is set out for the Wellington Region over the next 30 to 100 years, focusing on improving housing supply, affordability and choice, iwi/Māori housing capacity and taonga, climate change mitigation and adaptation, and transport choice and access.

45. Change 1 is consistent with the WRGF, and provides regulatory weight to the Framework. Change 1 integrates climate change, indigenous biodiversity, and fresh water, all of which contribute to the direction of urban development.

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7 https://www.gw.govt.nz/assets/Documents/2021/12/Te-Whaitua-te-Whanganui-a-Tara-Implementation-Programme_web.pdf
8 https://www.gw.govt.nz/assets/Documents/2021/12/te_mahere_wai_20211028_v32_DIGI_FINAL.pdf
9 https://www.gw.govt.nz/assets/Documents/2021/11/Te-Awarua-o-Porirua-Whatiua-Implementation-Programme.pdf
10 https://www.gw.govt.nz/assets/Documents/2021/12/ngatitoataopwhaituastatement-v2.pdf
11 https://www.gw.govt.nz/assets/Documents/2021/12/Final-Ruamhanga-WIP-August-2018-Pdf-version.pdf
12 Wellington Regional Growth Framework Report JULY 2021 (wrgf.co.nz)

3.0 RESOURCE MANAGEMENT ISSUES

Scope of Change 1 and reliance on national identification of resource management issues

46. Change 1 updates the RPS to respond to updated information, current Greater Wellington Regional Council policy, new national direction, or other relevant changes since the development of the operative RPS, for the following:

    - Lack of urban development capacity
    - Degradation of fresh water
    - Loss and degradation of indigenous biodiversity
    - The impacts of climate change.

47. These four issues are the focus of Change 1 because the RPS must be changed to give effect to NPS's for urban development and freshwater management, and taking an integrated approach to issues and responses (see following section), it is necessary to incorporate biodiversity and climate change issues in the scope of this change. There is also national direction, or draft national direction for indigenous biodiversity and climate change (refer Section 5.0) but this is not in the form of an operative NPS.

48. The two NPS for urban development and freshwater management were developed by central government in response to specific national resource management issues. It is necessary for Greater Wellington Regional Council to implement these national policy statements on the basis that they have already identified, analysed and responded to the relevant resource management issues. This report does not duplicate or reinterpret those issues.

49. Where there are specific implementation issues for the NPS relevant for the Wellington region (including the WRGF and Whaitua recommendations), these are identified in PART B related to a specific RPS topic.

50. The two additional aspects of this Change 1 (natural character in the coastal environment and regionally significant infrastructure), are minor updates to assist implementation consistency with national (NZCPS) and regional (final NRP) documents and are not responding to new resource management issues.

Integration of issues

51. A key focus in developing Change 1 and considering the resource management issues and responses to be included in Change 1, has been to take an integrated management approach. For Change 1, taking an integrated management approach means considering the connections between issues related to urban development and freshwater management, and a connected set of responses for the RPS direction for urban development, freshwater management, indigenous biodiversity and climate change.

52. The issues and topics in Change 1 are not independent of each other. Inappropriate use of natural resources, including both urban and rural activities, have damaged and continue to impact the natural environment, destroying ecosystems, degrading water, and leaving communities and nature increasingly exposed to the impacts of climate change[13]. Projected population growth and economic development will place additional pressure on the natural environment. There are also

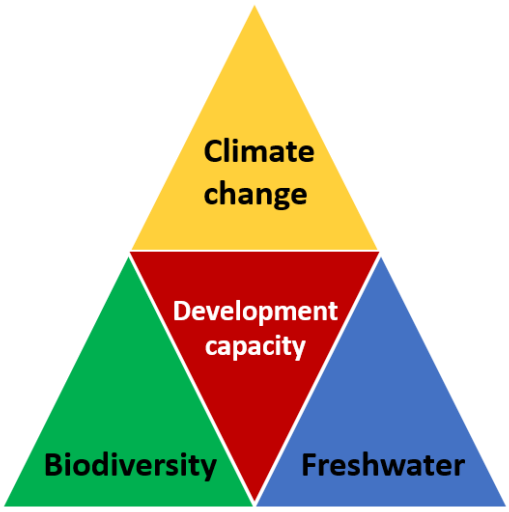
[13] Issues, including impacts on natural environment were defined as part of the Whaitua process, refer WIP documents referenced in Section 2 (Processes informing Change 1) and scientific reports informing those documents. In addition, GW monitoring of trends and reporting on achievement of objectives provides evidence of damage. Refer: Land, Air, Water Aotearoa website reports for Wellington region (Land, Air, Water Aotearoa (LAWA) - Wellington Region), Regional Plan review benchmarking report (Corporate Templates - Report (gw.govt.nz)), and report by Milne J. and Watts L. 2008. Stormwater contaminants in urban streams in the Wellington Region. Report no. GW/EMI-T-08/82. Prepared for Wellington Regional Council, Wellington - Stormwater Contaminants in Urban Streams in the Wellington Region Cover.indd (gw.govt.nz). GW state of the environment technical reports provide technical reports and overview documents of regional results and trends, State of the Environment reports | Greater Wellington Regional Council (gw.govt.nz).

significant pressures on the built environment in terms of lack of urban development capacity and affordable housing. Te Ao Māori and Mātauranga Māori have not been given sufficient weight in decision-making[14], from governance through to implementation.

53. Greater Wellington Regional Council has sought to integrate the issues and responses for fresh water, climate change, and indigenous biodiversity as a frame, to identify these three constraints in responding to national policy and in directing urban development capacity and intensification.

54. To guide the development of Change 1 and engagement with external parties on the approach for Change 1, the Council developed an illustration for this integrating frame (Figure 2).

Figure 2: Integrated framing of the key resource management issues for the region



55. The NPS-UD sets a prescriptive framework for urban intensification and development in high growth districts[15], unless the territorial authorities identify that urban development would conflict with specific matters. These "qualifying matters" include giving effect to any other National Policy Statement and providing for matters of national significance (RMA section 6 matters). While the territorial authorities are responsible for identifying the specific qualifying matter within their districts, the RPS can provide direction to assist territorial authorities in identifying what qualifying matters and their extent, in particular where it is to give effect to other national direction and matters of national significance in a Wellington context.

56. A "qualifying matter" includes the NPS-FM. The NPS-FM is based on a fundamental concept of Te Mana o te Wai and sets an objective[16] to ensure that natural and physical resources are managed in a way that prioritises:

- First, the health and well-being of water bodies and freshwater ecosystems
- Second, the health needs of people (such as drinking water)
- Third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

[14] Informed decision making is a Principle of Te Tiriti ō Waitangi
[15] Identified in the NPS-UD as tier 1 urban environments. This includes all urban areas within Wellington City, Hutt City, Upper Hutt City, Porirua City and Kapiti Coast District councils.
[16] NPS-FM, Objective in Section 2.1

57. The Ministry for the Environment's *Guidance on the National Objectives Framework of the National Policy Statement for Freshwater Management 2020* describes how the NPS-UD and NPS-FM are intended to relate to each other:

> *Councils must give effect to both the NPS-FM and the NPS-UD, in order to provide space for housing while protecting freshwater resources. Councils should give effect to the more general directives in the NPS-UD in a way that meets the more specific environmental protection directives of the NPS-FM. Planning urban development to give effect to Te Mana o te Wai, will require more strategic planning, and in many cases more efficient use of land. Reducing land available at one site, because of freshwater constraints, may result in more intensive housing elsewhere. Actively involving tangata whenua in these decision-making processes can assist with giving effect to Te Mana o te Wai and restoring the mauri of the wai. It is also an opportunity to apply mātauranga Māori to wider planning.*

58. Change 1 applies the integrating frame to ensure there is clear direction to territorial authorities to enable urban development that:

- Occurs in locations and uses approaches that prioritises the health of water bodies and freshwater ecosystems, and
- Is resilient to the effects of climate change and accounts for a transition to a low/no carbon future, and
- Protects areas of significant indigenous vegetation and significant habitats of indigenous fauna.

59. This integrated frame will bring together:

- Government direction on urban development and freshwater management
- Aspects of the Wellington Regional Growth Framework where Greater Wellington Regional Council, territorial authorities, mana whenua / tangata whenua and central government agencies agreed objectives
- Aspects of Whaitua Implementation Programme mahi and recommendations relevant to the scope of RPS Change 1
- Other national direction in legislation and policy for the four aspects of the frame.

60. Through the three completed whaitua processes, a lack of integrated management of environmental issues was identified as one of the key themes. All of the WIPs contain references or recommendations about integrated management including seeking better collaboration between the agencies responsible for natural resource management. The relevant WIP recommendations are part of Change 1 where they relate to the RPS.

Urban development capacity

61. The Wellington Region Housing and Business Capacity Assessment (HBA)[17], is required by the NPS-UD and completed jointly by the six councils that cover Wellington's major urban areas. The HBA looks ahead 30 years at demand for housing, land for future growth, and infrastructure capacity. Baseline data and an accompanying report were completed in 2019, providing an evidence base to inform location and regional decisions about urban development.

62. The HBA has confirmed that the Wellington Region lacks sufficient, affordable and quality housing supply and choice to meet current demand, the needs of projected population growth and the changing needs of our diverse communities. Housing affordability has declined considerably over the last decade, causing severe financial difficulty for many lower-income households, leaving

[17] Regional Housing & Business Development Capacity Assessment 2022 - WRLC

some with insufficient income to provide for their basic needs and well-being. There is also a lack of supporting infrastructure to enable the development of sufficient housing and ensure quality urban environments.

63. The 2022 HBA housing update report updates the 2019 baseline and finds that approximately 104,000 houses will be required by 2051 to meet demand. Based on current district plans, there will be a shortfall across the region at that time of more than 25,000 dwellings. The RPS and district plans implementing the NPS-UD with changes notified in 2022 will work together to address this critical shortfall over the next generation.

64. Some urban land use and activities [18] have damaged, and continue to impact, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increase the exposure of communities to the impacts of climate change[19].

65. While the NPS-UD is largely implemented through district plans, there are three issues that the NPS-UD requires the RPS to cover:

- Providing for a well-functioning and liveable urban environment
- Enabling and managing urban intensification
- Providing for responsive planning through introducing criteria for "adding significantly to development capacity".

Degradation of fresh water

66. Historic decision-making has prioritised the use of water for short term economic needs over the health and long term well-being of the waterbodies. As a result, the use of water for economic benefit and our quality of life has come at the expense of protecting the mauri of the wai and led to degraded quality, depleted quantity and highly modified aquatic ecosystems.[20]

67. Over time, changes in land use, in both urban and rural settings has led to degradation of our waterbodies. This degradation includes declining water quality, the loss of habitat and the degradation of ecosystem health. The state of our waterbodies, and the shift to restore them is outlined in Whaitua Implementation Programmes. The causes of this degradation are complex and many, as are the solutions. In very simple terms there has been inadequate control of land use activities and change and on discharge of contaminants. This is highlighted in the urban sector where stormwater quality controls have been inadequate, wastewater overflows are common, as is stream loss to urban subdivision. These issues are highlighted, because the focus of this RPS change is on the interface between urban development and fresh water.

68. In order to achieve our objectives for Te Mana o te Wai as directed by the NPS-FM, a much more directive regulatory approach along with identifying of a range of non-regulatory methods will be required in the RPS (and subsequent RMA plans). In particular, the updated RPS will need to:

- Reflect Te Mahere Wai and the Whaitua Implementation Programmes (WIPs)
- Provide greater clarity on what is needed to protect human health and how this might be prioritised in relation to other uses
- Clarify where activities/land uses will need to be constrained to achieve Te Mana o te Wai (regulatory) as well as identifying opportunities to do things differently

[18] For example through effects of earthworks and siltation of water bodies, increased stormwater and runoff, development working against rather than with natural features. Refer GW technical reports including Milne J. and Watts L. 2008. Stormwater contaminants in urban streams in the Wellington Region. Report no. GW/EMI-T-08/82. Prepared for Wellington Regional Council, Wellington; and SoE reporting State of the Environment reports | Greater Wellington Regional Council (gw.govt.nz)

[19] Refer references for these issues in footnote 13.

[20] Refer references in footnote 13, and also reports prepared to inform the WIP processes, for example Water management issues in the Ruamāhanga Whaitua https://www.gw.govt.nz/assets/Documents/2021/12/RWC-issues.pdf

- Provide much greater direction to territorial authorities about their role in achieving Te Mana o te Wai
- Drive active restoration of waterways achieving the visions / National Objectives Framework.

Loss and degradation of indigenous biodiversity

69. Amendments are required to the Indigenous Ecosystems chapter to align with the direction in Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020 (ANZBS). The changes to the provisions for indigenous ecosystems will also contribute to implementing the NPS-FM and pre-emptively consider the draft NPS on Indigenous Biodiversity that was released as an exposure draft in June 2022 (following a previous draft and consultation) and is expected to be finalised later in 2022.

70. The region's indigenous ecosystems have been significantly reduced in extent and are highly fragmented.[21] Loss of area and connectivity reduce the resilience of ecosystems to respond to ongoing pressures and threaten their persistence. Furthermore, the region's remaining indigenous ecosystems, and the ecosystem processes that support them, continue to be degraded or lost due to ongoing pressure from invasive species, human use and development, and climate change. Indigenous forest cover has increased only marginally (less than 1%) between 1996 and 2018[22] while the remaining area of natural wetland in the region declined by about 3% over the same period.[23]

71. Officer analysis of the operative RPS Indigenous Ecosystems provisions has determined that they have been ineffective in preventing further regional losses of indigenous biodiversity. The operative RPS directs the management of indigenous habitats with significant biodiversity values, which has had limited impact on the rate of habitat loss and the decline of ecosystem functions. Significant sites for aquatic ecosystems are identified and protected in the Natural Resources Plan. However, the identification and protection of significant terrestrial sites (Significant Natural Areas - SNAs) has yet to be completed for more than half of the region, despite being required by the RMA since 1991 and the RPS since 2013. This means that there is a lack of protection for these sites from the effects of urban development and other activities.

72. The ANZBS recognises that climate change is a key driver of indigenous biodiversity decline and that indigenous ecosystems have important values for climate change mitigation and adaptation. The RPS needs to be updated to reflect the outcomes being sought.

The impacts of climate change

73. Climate change is the global, national and local issue of our time[24]. The impacts of climate change are global in scope and unprecedented in scale – but occur at local places. Shifting and more variable weather patterns threaten food production, and rising sea levels and storm surges increase the risk of flooding. The causes of climate change needs to be addressed by internationally coordinated action, and our success depends on responses at national, local and individual levels.

74. In 2021 He Pou a Rangi the Climate Change Commission concluded that New Zealand needs to be proactive and courageous as it tackles the challenges the country will face in the years ahead, issuing a call to all New Zealanders "to take climate action today, not the day after tomorrow". The Commission recognises that all levels of central and local government must come to the table with

[21] For a summary of indigenous biodiversity status and threats in the Wellington Region see Greater Wellington. 2016. *Greater Wellington Regional Council Biodiversity Strategy*, https://www.gw.govt.nz/assets/council-publications/Biodiversity-Strategy-2016.pdf, pp. 6-7.
[22] Refer to LAWA. 2022. *Wellington region land cover*, https://www.lawa.org.nz/explore-data/land-cover/#/state
[23] Denyer, K., Peters, M. 2020. *The root causes of wetland loss in New Zealand: An analysis of public policies and processes*, https://www.wetlandtrust.org.nz/wp-content/uploads/2021/02/ROOT-CAUSES-OF-WETLAND-LOSS-IN-NZ_Jan-2021.pdf
[24] United Nations, 2022, https://www.un.org/en/global-issues/climate-change

strong climate plans to get us on the right track, concluding that bold climate action is possible when we work together.[25]

75. National policy and legislation to manage climate change has evolved and become more directive in the last ten years. Section 5.0 describes the policy settings and support to respond to climate change issues in the RPS. Almost all local government roles and responsibilities are in some way affected by climate change and/or could influence the management of climate change effects[26].

76. In 2019, Greater Wellington Regional Council declared a climate emergency. The pledge is to become carbon neutral by 2030 and take a leadership role in developing a Regional Climate Emergency Response Programme. The Council will work collaboratively with iwi, key institutions and agencies to reduce greenhouse gas emissions and prepare for the unavoidable effects of climate change, supporting international and central government targets for emissions reductions and adaptation planning. Kāpiti Coast District Council, Wellington City Council, Porirua City Council, and Hutt City Council have also declared a climate emergency.

77. Mana whenua / tangata whenua have made statements relevant to climate change:

- Ngāti Kahungunu Post-Settlement Governance Entity (PGSE) ki Wairarapa and Rangitāne Tū Mai Rā Trust (Wairarapa Tamaki Nui Ā Rua) PSGE, Joint Statement[27]
- Taranaki Whānui and Ngāti Toa Rangatira, Te Mahere Wai o Te Kāhui Taiao.[28]

78. At a regional level, NIWA has prepared a report which provides climate change projections and impacts for the Wellington Region[29]. This work adjusts national projections to specifically identify regional issues and impacts to focus our response. Further, climate change projections for 2040 and 2090 were prepared for each of the five individual whaitua[30] extrapolated from the 2017 regional parameters report.

79. Key regional climate change implications identified in the NIWA report include:

- Changes in patterns of rainfall will lead to more frequent and prolonged droughts, particularly in the Wairarapa, impacting pasture and crop growth, increase wildfire risk, putting pressure on drinking water supplies and impacting on indigenous biodiversity and ecosystems
- Increased instances of extreme rainfall events causing more flooding and landslips, leading to more damages to property and infrastructure, disruptions to transport, road closures, business continuity and increased insurance costs
- Sea level rise, which is already impacting coastal communities and infrastructure, will lead to increasing coastal erosion and storm tide flooding
- Sea level rise also impedes storm water and river flood flows, lifts water tables at the coast and slows down the drainage of surface water, adding to flood hazards in low lying coastal areas
- Enhanced hill country erosion due to extreme rainfall events will impact agricultural productivity and potentially increase river sedimentation, which in turn would affect water quality and aquatic.

80. Wellington regional carbon emissions have been measured using the Global Protocol for Community Scale Greenhouse Gas Emissions Inventory (GPC). A regional greenhouse gas inventory

[25] New Zealand Climate Change Commission, 2021: Ināia tonu nei: a low emissions future for Aotearoa
26 Local Government New Zealand, June 2017: How climate change affects local government: a catalogue of roles and responsibilities. https://www.lgnz.co.nz/assets/Uploads/f86bfef615/44476-LGNZ-How-climate-change-affects-local-government2.pdf
[27] Wairarapa Water Resilience Strategy 2021. https://swdc.govt.nz/wp-content/uploads/DCAG2June21F1-Water-Resilience-PresentationStrategy-tabled.pdf
[28] Te Mahere Wai o Te Kāhui Taiao (2021) WHAITUA TE WHANGANUI-A-TARA. https://www.gw.govt.nz/document/16706/te-mahere-wai-o-te-kahui-taiao
[29] NIWA (2019) Wellington Region climate change extremes and implications. Prepared for the Greater Wellington Regional Council (https://www.gw.govt.nz/assets/Documents/2017/06/Climate-Change-and-Variability-report-Wlgtn-Regn-High-Res-with-Appendix.pdf)
[30] Whaitua_Climate_Change_projections (gw.govt.nz)

report covering the 2001-2019 period was released in May 2020.[31] In the 2018/19 reporting year the Wellington Region emitted gross 4,190,050 tonnes of carbon dioxide equivalent (tCO2e). After consideration of carbon sequestration (carbon captured and stored in plants or soil by forests), the Wellington Region emitted net 2,552,727 tCO2e emissions. Carbon sequestration reduced gross emissions by 1,637,323 tCO2e, a 39 percent reduction. Eighty-four percent of this sequestration occurred in the Wairarapa area[32].

81. In the Wellington Region, the main sources of greenhouse gas emissions and changes since 2001 are:

Source of emissions	**Proportion of total region emissions 2018-19**	**Change in emissions 2001 – 2019** [33]
Transport	39%	+14%
Agriculture	34%	-17%
Stationary energy	18%	-18%
Waste	5%	-36%
Industry	4%	+405%

82. The two main sources of emissions for the Wellington Region are transport and agriculture. While agriculture emissions decreased over this period, transport emissions increased. The reduction in agricultural emissions was due to a fall in the number of farm animals within the region between 2001 and 2019, with the numbers of cattle (both diary and non-dairy), sheep and pigs reducing from 2,154,677 to 1,721,907. This is likely due to a general increase in farming efficiency/production per animal.

83. The main causes for an increase in transport emissions were road petrol and diesel (cars and trucks, up 8%), aviation (up 37%) and shipping (up 22%). Within this, fuel use/emissions associated with shipping logs overseas increased by a factor of 13 compared to 2000-01, and all other international shipping doubled.

84. Transport emissions around the region vary. For example, in 2018-19 Upper Hutt's transport emissions were 6% lower than 2000-01, Wellington City's increased 4 per cent and emissions from Kāpiti and Wairarapa increased by 40 per cent and 41 per cent respectively (the rise in part due to the transport of logs overseas, as emissions are allocated to the district where the logs originate).

85. The waste sector reduced greenhouse gas emissions more than any sector due to the use of landfill gas capture. Greater use of renewable energy to provide electricity also reduced the influence of stationary energy on total emissions. In the industrial sector many emissions are caused by industrial refrigerant use and, while there was a considerable change in emissions in this sector, this was from a very low base.

86. The RPS can help to support the local authorities of the Wellington Region achieve integrated and sustainable management of the environment, help implement spatial planning approaches and build resilience into our infrastructure and, working together, support local communities to thrive.

[31] Greater Wellington Regional Council — Wellington regional greenhouse gas inventory report 2001-2019 (gw.govt.nz)
[32] This is because the Wairarapa area includes a 74% share of the Wellington Region's land area and includes a much higher proportion of agricultural land use compared to other districts in the region.
[33] NIWA (2019) Wellington Region climate change extremes and implications. Prepared for the Greater Wellington Regional Council (https://www.gw.govt.nz/assets/Documents/2017/06/Climate-Change-and-Variability-report-Wlgtn-Regn-High-Res-with-Appendix.pdf)

87. The regionally significant issues, and the issues of significance to the Wellington region's iwi authorities, relating to climate change are:

- Greenhouse gas emissions must be reduced significantly, immediately and rapidly
- Climate change and the decline of ecosystem health and biodiversity are inseparably intertwined
- The risks associated with natural hazards are exacerbated by climate change
- Climate change impacts will exacerbate existing inequities
- Climate change threatens tangible and spiritual components of Māori well-being
- Social inertia and competing issues need to be overcome to develop an urgent, but careful, climate change response.

The need for a significant reduction of greenhouse gas (GHG) emissions

88. Immediate, rapid, and large-scale reductions in greenhouse gas emissions are required to limit global warming to 1.5°C, the threshold to avoid significant impacts on the natural environment, the health and well-being of our communities, and our economy. Extreme weather events and sea level rise are already impacting our region, including on biodiversity, water quality and availability, and increasing the occurrence and severity of natural hazards. Historical emissions mean that we are already locked into continued warming until at least mid-century, but there is still an opportunity to avoid the worst impacts if global net anthropogenic CO2 emissions are reduced by at least 50 percent from 2019 levels by 2030, and carbon neutrality is achieved by 2050. In the Wellington Region, the main sources of greenhouse gas emissions are transport (39 percent total load in 2018-19), agriculture (34 percent), and stationary energy (18 percent).

The linkages between climate change and declining ecosystem health

89. Climate change is placing significant additional pressure on species, habitats, ecosystems, and ecosystem processes, especially those that are already threatened or degraded, further reducing their resilience, and threatening their ability to persist. This, in turn, reduces the health of natural ecosystems, affecting their ability to deliver the range of ecosystem services, such as carbon sequestration, natural hazard mitigation, erosion prevention, and the provision of food and amenity, that support our lives and livelihoods and enable mana whenua / tangata whenua to exercise their way of being in the Te Ao Tūroa, the natural world.

90. Key messages from the *Wellington Region climate change extremes and implications report*[34] prepared for Greater Wellington Regional Council on implications for ecosystems include:

- Ecosystems will be affected by changing distributions and species of pests because of changes to temperature (air and water) and rainfall patterns
- Extreme warm temperatures may influence masting events in native beech forests.
- Wetlands will be affected by changes to rainfall patterns, particularly increasing incidence of drought
- Reductions in low river flows will have impacts on freshwater ecosystems as this may reduce habitat availability and quality
- Increases in extreme rainfall may lead to more sedimentation and turbidity in freshwater and estuarine systems, affecting habitat quality
- Increased water temperatures may move current habitats outside of tolerable ranges for some aquatic species, and water quality problems (e.g. cyanobacterial blooms) may be exacerbated.

[34]NIWA (2019) Wellington Region climate change extremes and implications. Prepared for the Greater Wellington Regional Council (https://www.gw.govt.nz/assets/Uploads/gwrc-niwa-climate-extremes-final3.pdf).

The risks associated with natural hazards exacerbated by climate change

91. Communities of the Wellington Region are already affected by a wide range of natural hazards. The hazard exposure of our communities, land, infrastructure, food (including mahinga kai), and water security is increasing because of climate change impacts on a range of natural hazards. Greater Wellington Regional Council maintains flood defences for many communities at risk of river flooding in the Hutt Valley, Kāpiti Coast, Masterton and Greytown. The predicted increased intensity and frequency of rainfall and sea level rise in river reaches close to the coast will reduce the effectiveness of these defence schemes and increase flood risk in these areas, as well as other areas that are not managed at present.

92. An analysis of the long-term trends of local sea level using the tide gauge in Lambton Harbour[35] shows that since 1890, sea level has been rising at 2.23 mm/yr[36]. This amounts to a significant increase in the height that wave energy is able to reach and impact on beaches, dunes, estuaries, properties and coastal infrastructure over the past 130 years. There are several low-lying communities and roads in the region subject to regular inundation from storm tides and high waves, from Ōtaki on the Kāpiti coast through to Porirua Harbour, the Wellington coast and harbour and in Wairarapa. The rate of sea level rise is being compounded by a regional trend of tectonic subsidence that is currently adding between 1-4 mm per year to the relative rate of sea level rise. As a result of this, the Wellington region has one of the highest rates of sea level rise in New Zealand.

93. Traditional approaches to development that have not fully considered the impacts on natural systems, and our over-reliance on hard engineered protection works, which will inevitably become overwhelmed and uneconomic to sustain, will ultimately increase the risk to communities and the environment. Adapting to the risks of coastal hazards and increased erosion and flooding caused by climate change presents a significant challenge for the region over the coming decades.

The impacts of climate change will exacerbate existing inequities

94. The impacts and costs of responding to climate change will not be felt equitably, especially for Māori. Some communities have no, or only limited, resources to enable mitigation and adaptation and will therefore bear a greater burden than others, with future generations bearing the full impact. The population groups in New Zealand considered to be at greatest risk of inequitable outcomes include socio-economically deprived individuals, Māori, Pacific peoples, children, the elderly, and agricultural workers.[37]

Climate change threatens tangible and spiritual components of Māori well-being

95. Climate change threatens both the tangible and spiritual components of Māori well-being, including Te Mana o Te Wai and Te Rito o Te Harakeke, mahinga kai, and taonga species, and the well-being of future generations. Significant sites for Māori, such as marae, wāhi tapu and urupā, are particularly vulnerable as they are frequently located alongside the coast and fresh waterbodies.

Social inertia and competing interests need to be overcome to successfully address climate change

96. Many people and businesses lack an understanding of the connection between their actions, greenhouse gas emissions, climate change, the ways that climate change will impact their lives and businesses, and the changes that they can make to help the transition to a low-emissions and

[35] the portion of the Wellington Harbour from the container terminal to the start of Oriental Bay
[36] NIWA (2019) Wellington Region climate change extremes and implications. Prepared for the Greater Wellington Regional Council (https://www.gw.govt.nz/assets/Uploads/gwrc-niwa-climate-extremes-final3.pdf).
[37] https://www.nzmsj.com/climate-medicine-our-changing-climate-and-health-inequity-in-new-zealand.html

climate-resilient future. Social inertia and competing interests are the biggest issues to overcome to address climate change.

97. Social inertia is not a Wellington specific issue, however as noted above, the RPS can help support the local authorities of the Wellington Region achieve integrated and sustainable management of the environment and support local communities to thrive. The objectives, policies and methods in the RPS will help the region to both mitigate and adapt to the effects that climate change is having on the region now and into the future.

98. The RPS response to climate change in the Wellington Region focuses on three key areas of action that local government roles and responsibilities are able to influence:

- Reducing gross greenhouse gas emissions from transport, agriculture, stationary energy, waste and industry.
- Increasing greenhouse gas removal/sinks through carbon sequestration, while recognising that this is only a short-term solution, and that the focus must be on reducing gross greenhouse gas emissions.
- Taking adaptation action to increase the resilience of our communities, the natural and built environment to prepare for the changes that are already occurring and those that are coming down the line. Critical to this is the need to protect and restore natural ecosystems so that they can continue to provide the important services that ensure clean water and air, support indigenous biodiversity and ultimately, people.

4.0 PARTNERSHIP, ENGAGEMENT AND OUTCOMES

99. Partnership and engagement has been a continual part of the policy development process for Change 1. In identifying and assessing issues, options, and developing the proposed provisions, Greater Wellington Regional Council worked with external parties and internal teams through informal briefings and feedback, structured engagement, workshops, and formal consultation.

100. A summary of partnership and engagement in developing Change 1, and the outcomes that have contributed to the development of Change 1, is provided in this section. Further detail on advice received from mana whenua / tangata whenua and the response to that advice, is in Appendix D.

101. The feedback and outcomes are reflected in the evaluation of the preferred option summarised in this report.

102. The scope of Change 1 has resulted in a focused engagement programme with targeted consultation and involvement of mana whenua / tangata whenua, territorial authorities, Ministers and central government departments. The upcoming Schedule 1 process[38] provides for general stakeholder and community consultation.

Previous consultation

103. In addition to the focused engagement programme, the Council has drawn on information provided in separate but related consultation processes. This is taking an efficient approach to consultation and engagement acknowledging the resource constraints and demands for consultation on many of our partners, stakeholders and the community. The RMA also provides for previous consultation to be used for RMA purposes where that separate consultation is known to be linked to matters under the RMA.[39]

104. Recent Greater Wellington processes have directly involved mana whenua / tangata whenua, territorial authorities, Ministers, and key stakeholders, and have directly contributed to this RPS Change. In particular, the whaitua processes were community focused in each whaitua, with a direct objective of feeding into RMA plans and policy statements (as well as other documents and decisions).

105. The WRGF has been subject to extensive community consultation as it has developed and evolved over time. Most recently, the draft WRGF was subject to public consultation in 2021.

106. This previous consultation, combined with the focused scope of this RPS Change, has meant that wide public engagement in the preparation of this RPS Change was not undertaken by the Council. Rather, the Schedule 1 process would provide for this, building on the previous consultation.

Statutory consultation

107. Schedule 1 of the RMA requires that, during the preparation of a proposed policy statement, the regional council shall consult:

- The Minister for the Environment
- Other Ministers of the Crown who may be affected by the policy statement
- Local authorities who may be affected
- The tangata whenua of the area, through iwi authorities
- Any customary marine title group in the area.

[38] Both the standard process and Freshwater Planning Process provide for public submissions and hearings.
[39] RMA Schedule 1, clause 3C.

108. As anticipated by Clause 3A of RMA Schedule 1, the Wellington Regional Triennial Agreement (2019-2022)[40] contains specific clauses on the consultation process to be followed during a change or review of the RPS:

- The Regional Council will make available to all local authorities, for discussion and development, a draft copy of any change to the RPS
- Territorial authorities shall have no less than 30 working days to respond to the proposal
- The Regional Council agrees to consider fully any submission and representation on the proposal.

109. In developing Change 1, the Council engaged with representatives of Ministers of the Crown (through Department officials), territorial authorities, and mana whenua / tangata whenua partners as required by Schedule 1 and set out further below.

110. A draft Change 1 was provided to mana whenua / tangata whenua, territorial authorities, and relevant Ministers on 30 May 2022, with a request for feedback by 13 July 2022. There are no groups in the Wellington Region holding customary marine title.

111. The draft Change 1 was sent to:

- Greater Wellington Regional Council's six mana whenua / tangata whenua partners.
- The following Ministers:
    - Minister of Conservation
    - Minister for the Environment
    - Minister of Transport
    - Minister for Agriculture
    - Minister for Climate Change
    - Minister of Local Government
    - Minister for Māori Development
    - Minister of Housing
    - Minister of Forestry
- Territorial Authorities within the Wellington Region and Wellington Water
- Neighbouring regional councils and unitary authorities:
    - Horizons Regional Council
    - Marlborough District Council
    - Tasman District Council.

Mana whenua / tangata whenua

112. Greater Wellington Regional Council mana whenua / tangata whenua partners have an instrumental role to play in developing freshwater visions and objectives for the RPS, as directed by the NPS FM. Greater Wellington Regional Council invited their involvement in all aspects of Change 1, however the priority was partnering on the Te Mana o te Wai / Freshwater mahi for the RPS as well as regional plans implementing the NPS-FM. A key input in identifying issues and recommended responses is the whaitua processes and the Whaitua Implementation Programmes that have been developed jointly with mana whenua / tangata whenua and other key stakeholders. The six partners are:

- Ngāti Kahungunu ki Wairarapa
- Rangitāne o Wairarapa
- Ngāti Toa Rangatira
- Te Ātiawa ki Whakarongotai

[40] Wellington Regional Triennial Agreement 2019-2022 clause 5.3, as referenced in Clause 3A of Schedule 1

- Ngā Hapū o Ōtaki
- Taranaki Whānui (through PNBST).

113. For Change 1, Greater Wellington worked with mana whenua / tangata whenua parties to develop approaches to involvement in considering options and formally responding on drafting (as described above). Greater Wellington has identified contact points in the Council for each partner and built on existing relationships and additional resourcing arrangements for this Change 1 work.

114. Ongoing contact and work with mana whenua / tangata whenua partners in development of Change 1 occurred in various ways linked to the capacity and timing of the different partners. Advice received from iwi authorities on the draft provisions (in May-July 2022) was given particular regard in finalising the options and detailed drafting in Change 1. Key points of advice and the Change 1 response is set out in the following paragraphs.

115. Engagement with Rangitāne o Wairarapa and Ngāti Kahungunu ki Wairarapa was very productive. From May to August, officers met with them weekly, for the most part jointly, discussing and feeding back on each topic of Change 1. This extensive discussion and feedback shaped many of the provisions, and for that reason both iwi indicated that they will not provide formal feedback on the draft of RPS Change 1.

116. Officers met with Rangitāne o Wairarapa and Ngāti Kahungunu ki Wairarapa separately to develop their Te Mana o te Wai expressions. Each statement includes their relationship with freshwater and te taiao, their values, the importance of mātauranga Māori and its protection, and their role in decision making and natural resource management.

117. Officers discussed all key topics with Ngāti Toa Rangatira. They were keen to be involved and prioritised this work amongst district plan changes that sought their attention. Ngāti Toa made a submission on the draft which shaped the final provisions in a number of ways. Officers will engage with Ngāti Toa before the change is notified to discuss the points of submission that were not fully incorporated. Ngāti Toa have indicated that they plan to insert their Te Mana o te Wai statement through submission on RPS Change 1, or in the full review of the RPS planned for 2024.

118. Officers began discussions with Ngā Hapū o Ōtaki and Ātiawa ki Whakarongotai but were unable to progress to detailed drafting due to time constraints. Although they had little involvement in drafting provisions, both iwi made comprehensive submissions on the draft, which officers have given significant weight to in refining provisions. Ngā Hapū o Ōtaki and Ātiawa ki Whakarongotai noted in their submissions that they expect to be involved in plan reviews in the future, and that their expressions of Te Mana o te Wai and freshwater visions will not be included in the RPS until the Whaitua Kāpiti process is completed. Officers will seek to meet with them before the change is notified to discuss the points of submission that were not fully incorporated.

119. Due to time constraints and the availability of appropriate planning experts, Taranaki Whānui was not able to be involved in the preparation of RPS Change 1. Officers specifically sought feedback on draft wording for a freshwater vision for Te Whanganui-a-Tara based on the Whaitua Implementation Programme and Te Mahere Wai. Taranaki Whānui intend to discuss this drafting with Ngāti Toa to ensure their shared interests in the catchment are reflected, and hope to make a submission which could include a freshwater vision for Te Whanganui-a-Tara. Officers will work with Te Hunga Whiriwhiri to create a welcoming space for Taranaki Whānui when they are able to engage.

Territorial Authorities

120. Engagement with Territorial Authorities has occurred at a number of levels over the last 12 months. The objectives and policies endorsed by Council in February were provided to the Wellington

Regional Leadership Committee. The proposed approaches have been discussed with the Regional Planning Managers Group. Officers are also engaging directly with their peers at the TAs, and using existing groups (e.g. Regional Climate Change Forum).

121. Feedback on the draft Change 1 was received from all the city and district councils in the region (excluding Tararua District Council) and from Wellington Water in July 2022. No feedback was received from neighbouring councils.

122. Hutt City Council provided detailed comments on provisions, with helpful suggestions to improve drafting. The key matters raised were ensuring that the overarching issues and objectives need to reflect the built environment as well as the natural environment; and that the deadlines for identifying and protecting indigenous biodiversity should align with the exposure draft NPS-IB.

123. Kāpiti Coast District Council (KCDC) provided both high-level and detailed comments. KCDC was the only local authority whose feedback was from an elected representative (the others were officer submissions). KCDC's key issue is it considers the regional council is asking city and district councils to undertake its functions, particularly in relation to freshwater management. This view was shared by Porirua and Upper Hutt City Councils. KCDC also raised questions about the ability of city and district councils to lawfully reduce greenhouse gas emissions through district plans, and are of the view that the draft RPS Change 1 is seeking to impose regulatory methods in district plans over more appropriate non-regulatory methods.

124. Porirua City Council provided both high-level and more detailed comments. Most of PCC's detailed comments provided helpful drafting suggestions. A key point PCC raised was the need to have thresholds for when each of the 'consideration' policies apply, to avoid capturing resource consent applications or plan changes that are not of a sufficient scale or relevant type.

125. Upper Hutt City Council provided high-level comments only, which largely supported the points raised by KCDC (see paragraph 123). In addition, UHCC considers that amendments to the indigenous biodiversity provisions should wait until the NPS-IB is gazetted (currently anticipated to be the end of 2022).

126. Wairarapa Councils (Carterton, Masterton, and South Wairarapa District Councils) were generally supportive of the draft provisions and commented on broad alignment with the direction of the Wairarapa Combined District Plan review. SWDC and MDC provided both detailed and high-level comments; CDC provided verbal comments and support for the other Wairarapa council submissions. Key concerns raised include:

- Providing clarity on what is expected of Tier 1 councils vs. Tier 3 and other councils
- Recognising what is realistic to achieve in smaller urban areas and taking a more site-specific approach where necessary
- Aligning with national direction on climate change and indigenous biodiversity
- Clarifying how impacted communities will be supported through implementation.

127. Wellington City Council provided detailed comments on provisions with suggestions to improve clarity and consistency, focusing mostly on climate change, regional form, and indigenous biodiversity. They particularly sought greater recognition of a broader range of greenhouse gas emissions reduction initiatives throughout the climate change provisions, for example to support the use of hydrogen fuels and bio-fuels. WCC also expressed concern that reference to the hierarchy of centres and regional form had diminished and sought greater re-enforcement of Wellington City as the region's capital.

128. Wellington Water Limited provided detailed feedback on objectives and regulatory policies, mainly related to climate change, freshwater and urban development. They suggested the need for additional policies for water security, supply, and demand management in the face of population growth and climate change.

129. Following receipt of the feedback from the territorial authorities, Planning Managers met on 28th and 29th July2022 to discuss the feedback and how it has been responded to. The majority of managers were satisfied with how they had been involved in the RPS Change 1 process.

Central government, stakeholders and advisers

130. Engagement with key stakeholders relevant to the topics of Change 1 was undertaken directly with those stakeholders during the development of the change. In addition to Ministers consulted formally (see above), engagement also occurred with:

- Greater Wellington's Farming Reference Group
- Department of Conservation
- Waka Kotahi New Zealand Transport Agency
- Ministry for the Environment
- Ministry for Primary Industries and He Waka Eke Noa
- Telecommunications providers
- Radiocommunications providers.

131. Engagement with the Farming Reference Group on Change 1 topics most relevant to rural and farming communities occurred and feedback received on the policy proposals for agricultural emissions, climate resilient communities, transport emissions and indigenous ecosystems. Draft policy wording was also tested with the group.

132. Feedback on draft Change 1 was received from Kāinga Ora and Waka Kotahi.

133. Kāinga Ora is generally supportive of draft Change 1, and provided broad and strategic comments, as well as detailed feedback on provisions. Kāinga Ora supports the incorporation of the NPS-UD in the RPS, including the promotion of transit-oriented development and the integration of land use and transport planning to contribute to the region's net-zero emissions target. They also support the incorporation of Mātauranga Māori and Te Ao Māori in management and monitoring. The submission sought additional policies on housing, infrastructure planning, and equality of access to public transport.

134. Waka Kotahi provided high-level comments and detailed feedback on provisions, and are keen to continue to engage following notification. Waka Kotahi is generally supportive of the policies relating to urban development, climate change, indigenous biodiversity and freshwater, and is focussed on ensuring there will be pathways for Waka Kotahi activities. The questions and feedback related to transport emissions are particularly helpful.

Key outcomes incorporated into Change 1

135. Feedback received, and work undertaken by officers during the consultation period resulted in hundreds of small changes to the draft Change 1 document. This section outlines major changes to topics, and provisions in the final Change 1. Further detail of the feedback received and response to the feedback is outlined in Appendix D.

Urban development

136. The urban development provisions, which implement the NPS-UD, have been reworded to address the many useful comments received from mana whenua / tangata whenua partners and the territorial authorities. For example, amendments to Policy 31 address comments from Wairarapa

Councils allowing for some level of intensification in "non-urban environments" in the Wairarapa, in particular Featherston and Carterton. There were many minor wording changes, but no major changes in direction as a result of feedback.

Freshwater

137. The NPS-FM requires the RPS to include *an objective that describes how the management of freshwater in the region will give effect to Te Mana o te Wai*. All policies and methods in the RPS relating to freshwater must contribute to achieving this objective. Each of our six partners wish to express their meaning of Te Mana o te Wai as part of this objective. Rangitāne o Wairarapa and Kahungunu ki Wairarapa have prepared their expressions of Te Mana o te Wai. Others may be added through submissions on RPS Change 1, or through future changes to the RPS.

138. The NPS-FM also requires the council to insert freshwater visions, as objectives, in the RPS. The vision objectives in the RPS will inform environmental outcomes and target attribute states in the Natural Resources Plan (as required by the NPS-FM). It is important that the vision objectives are in the RPS before further changes to the NRP are notified.

139. It is proposed that there will be a vision objective for each whaitua. The priority for the development of visions are Te Awarua-o-Porirua and Te Whanganui-a-Tara as changes to the NRP in 2023 involve the inclusion of provisions (environmental outcomes) for these whaitua. Greater Wellington worked closely with Ngāti Toa and Taranaki Whānui to prepare these freshwater visions. However, they needed more time to work together and talk to their kaumatua about the visions before they are ready to have these put in the RPS.

140. These two visions can be inserted in RPS Plan Change 1 via a submission from the iwi. They have indicated that they favour this option and would action a submission. Freshwater visions for other whaitua will be inserted in future changes.

141. In addition to the new material described above, there are a number of changes to the freshwater provisions as a result of aligning with the NPS-FM and these objectives, the feedback received in the draft, and further policy-work:

- Consideration of mana whenua / tangata whenua values and the place of mana whenua / tangata whenua in decision making has been strengthened throughout
- A number of consideration policies have been changed because the test of "having regard to" is not strong enough for matters that have to be "given effect to" in relation to the NPS-FM. The directive policies have been strengthened as a result, and the consideration policies mainly direct resource consenting and not regional and district plans
- Changes have been made to policies to further clarify the roles of the regional plan and district plans in the management of land.

Indigenous Ecosystems

142. As a result of feedback received on the draft, and further follow-up policy work, the indigenous ecosystems provisions were amended in the following ways:

- New and existing provisions are strengthened to better recognise and provide for mana whenua / tangata whenua values, including incorporating the concept of Te Rito o te Harakake - a concept central in the exposure draft NPS-IB
- Objectives and policies are redrafted and amalgamated to simplify the language and clarify the outcomes sought.

Climate change

143. As a result of feedback received on the draft, and further policy work since May, the climate change provisions were amended in the following ways:

- Language has been tightened, and aligned with the RMA
- The role of regional council/regional plans, and district councils/district plans have been clarified
- Clarification was made to Objective CC.3 to recognise that local government holds only some of the levers to influence greenhouse gas emission targets, thus it refers to actions to "contribute to" achieving emissions targets, and the transport sector targets have been moved from a policy into the objective
- Policies related to agricultural emissions have been split to clarify the predominantly non-regulatory approach the RPS is taking to reduce emission
- A new objective to tie "right tree right place" to climate change intent, rather than soil conservation
- A new policy to support adaptation by mana whenua / tangata whenua, and partnering with mana whenua / tangata whenua is specified in relevant provisions.

5.0 REGULATORY AND POLICY CONTEXT

144. This section contains a summary of the main documents that have guided the development of Change 1. The separate evaluation in Part B of each topic provides any further regulatory context where relevant to the evaluation of that specific proposal.

145. Particular considerations in preparing changes to the RPS are summarised below and include:

- RMA: The purpose and principles in Part 2 of the RMA; Greater Wellington Regional Council functions under section 30 of the RMA; the requirements for RPS under section 59 to 62 of the RMA
- The Principles of Te Tiriti o Waitangi
- Environmental management documents recognised by an iwi authorities
- National Policy Statements prepared under the RMA
- New Zealand Coastal Policy Statement prepared under the RMA
- National Planning Standards under the RMA
- Other national policy, strategy or legislation not under RMA but related to the topics of Change 1
- Regional plans prepared under the RMA – the Wellington Natural Resources Management Plan
- Wellington Regional Growth Framework
- Other regional management plans and strategies prepared under other Acts.

Resource Management Act 1991

146. Regional policy statements and plans must be prepared in accordance with the provisions of Part 2 of the RMA. The purpose of the RMA, section 5 of the RMA is:

> *(1) The purpose of this Act is to promote the sustainable management of natural and physical resources.*
>
> *(2) 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 well-being and for their health and safety while—*
>
> > *(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
> >
> > *(b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
> >
> > *(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment*

147. The provisions of the changes have been developed in consideration of all of the matters in Part 2 including the matters of national importance (Section 6), other matters (Section 7) and the Principles of the Treaty of Waitangi (Section 8).

148. Section 30 of the RMA sets out the functions of regional councils which includes:

> *(a) the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the natural and physical resources of the region:*

(b) the preparation of objectives and policies in relation to any actual or potential effects of the use, development, or protection of land which are of regional significance:

(ba) the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in relation to housing and business land to meet the expected demands of the region:

149. The purpose of regional policy statements is to 'achieve the purpose of the Act by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region.'[41] To achieve this purpose, an integrated approach to management of fresh water, urban development, indigenous ecosystems and climate change has been taken.

150. The contents for RPS[42] is reflected in the National Planning Standards, with the primary content being:

(1) A regional policy statement must state—

(a) the significant resource management issues for the region

(b) the resource management issues of significance to iwi authorities in the region

(c) the objectives sought to be achieved by the statement

(d) the policies for those issues and objectives and an explanation of those policies

(e) the methods (excluding rules) used, or to be used, to implement the policies

(f) the principal reasons for adopting the objectives, policies, and methods of implementation set out in the statement.

Resource Management Amendment Act 2020

151. The Resource Management Amendment Act 2020 (RMAA) came into force on 30 June 2020 and include three specific amendments to enable local authorities to consider the effects of greenhouse gas emissions on climate change. The Regulatory Impact Statement states that "the overarching issue being addressed is alignment between the RMA and the ZCA[43], in order to help build a coherent and effective set of policies to progress a well-managed and timely transition to a low emissions economy"[44]. More specifically, the amendments sought to reverse the 2004 amendments to the RMA that restrict local authorities from considering greenhouse gas emissions under the RMA noting that "This is now creating a tension with other aspects of climate change policy which has evolved significantly over the last 15 years, most notably through the major changes brought in by the recent ZCA"[45].

[41] RMA Section 59
[42] RMA Section 62
[43] ZCA was referring to Zero Caron Act which subsequently become the Climate Change Response (Zero Carbon) Amendment Act 2019.
[44] Ministry for the Environment (2019), 'Regulatory Impact Statement Linking the Zero Carbon Act 2019 and the Resource Management Act 1991', refer: Regulatory Impact Assessment - Impact Summary Template (environment.govt.nz)
[45] Regulatory Impact Statement Linking the Zero Carbon Act 2019 and the Resource Management Act 1991 (see above), pg.3.

152. The RMAA includes two key amendments relating to climate change mitigation which come into effect on 30 November 2022:

- Removing the 2004 statutory barriers to the consideration of the effects of greenhouse gas emissions on climate change when making discharge rules and assessing applications for discharge permits (repealing sections 70A, 104E and 104F of the RMA)
- Requiring regional councils and territorial authorities to "have regard to" emission reduction plans and national adaptation plans published under the CCRA when preparing regional policy statements, regional plans, and district plans.

153. The commencement of these amendments is to align with timeframes for the Emission Reduction Plan and National Adaptation Plan under CCRA and to allow time for national direction on greenhouse gas emissions to be developed. Final versions of both plans have now been published. National direction is in development on greenhouse gas emissions from industrial process heat[46], which is intended to guide regional council decision-making on industrial greenhouse gas emissions. It will involve a NPS and NES to prohibit new coal boilers and phase out the use of fossil fuels for industrial process heat.

National direction and strategy

154. Change 1 is to implement the NPS-UD and NPS-FM in the RPS[47]. An outline of the requirements of the NPS-FM and NPS-UD and how these have been addressed in Change 1 is set out below and in Appendix B – NPS-UD requirements addressed and Appendix C – NPS-FM requirements addressed. There is also other national direction that has informed the scope and preferred options in Change 1 as outlined below.

National Policy Statement on Urban Development

155. The NPS-UD was released in August 2020 which replaced and builds on the former National Policy Statement for Urban Development Capacity 2016. The NPS-UD is designed to improve the responsiveness and competitiveness of land and development markets. In particular, it requires local authorities to open up more development capacity, so more homes can be built in response to demand.

156. The NPS-UD sets a prescriptive framework for intensification and development, unless the territorial authorities identify that growth would conflict with specific matters. These "qualifying matters" include giving effect to any other NPS and providing for matters of national significance (RMA section 6 matters). The RPS can give clear direction to district councils for identifying these matters.

157. The NPS-UD identifies local authorities as tier 1 or 2 if the urban areas within those districts and regions are to experience or are likely to experience medium to high growth. All other districts and regions by default are tier 3 where there is an urban environment within the district[48]. Requirements under the NPS-UD are proportionate to the tier of the local authority. Greater Wellington Regional Council is identified as a tier 1 regional council.

158. Implementation of the NPS-UD is influenced by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act passed into law on 20 December 2021. This Act amends the RMA and strengthens some requirements related to the NPS-UD to increase housing supply in tier 1 urban areas. The Amendment requires medium density residential standards

[46] Refer: Discharge to air of greenhouse gases | Ministry for the Environment.
[47] The NPS are not fully implemented in Change 1. Changes to district plans and the Natural Resources Plan are also required.
[48] Defined as being, or intended to be, predominately urban in character and part of a housing and labour market of at least 10,000 people

(MDRS) for specified urban areas, to enable a wider variety of housing choice. Tier 1 councils must apply the MDRS to most of their existing residential areas as part of their plans from August 2022.

National Policy Statement for Freshwater Management

159. The NPS-FM came into force on 3 September 2020, replacing the NPS-FM 2014 (as amended 2017). The NPS-FM sets the direction for freshwater management in New Zealand through the framework of Te Mana o te Wai. Te Mana o te Wai is described as the fundamental concept for the NPS-FM, recognising that protecting the health of fresh water protects the health and wellbeing of the wider environment. Te Mana o te Wai has a hierarchy of obligations that prioritises: First, the health and wellbeing of water bodies and freshwater ecosystems; Second, the health needs of people (such as drinking water); Third, the ability of people and communities to provide for their social, economic, and cultural wellbeing, now and in the future.

160. Regional councils are directed under the RMA to give effect to the requirements of the NPS-FM when developing statutory plans and plan changes. The NPS-FM requires freshwater quality to be maintained (where it meets stated environmental outcomes) or improved over time (where it does not meet stated environmental outcomes) and includes a national objectives framework for achieving this. Councils must notify regional plans or policy statements to implement the NPS-FM by 31 December 2024.

161. The NPS-FM requires:

> *Every regional council must include an objective in its regional policy statement that describes how the management of freshwater in the region will give effect to Te Mana o te Wai* (section 3.2(3)).

162. The NPS-FM also requires:

> *Every regional council must develop long-term visions for freshwater in its region and include those long-term visions as objectives in its regional policy statement* (section 3.3(1))

163. Section 3.3(2) of the NPS-FM states that:

> *Long-term visions:*
>
> *(a) may be set at FMU, part of an FMU, or catchment level; and*
>
> *(b) must set goals that are ambitious but reasonable (that is, difficult to achieve but not impossible); and*
>
> *(c) identify a timeframe to achieve those goals that is both ambitious and reasonable (for example, 30 years after the commencement date)*
>
> Long-term visions are not being added to the RPS in this plan change. Consultation with iwi and community was not completed in time for inclusion. These will be added at the first next available plan change, or through the Schedule 1 process.

164. The NPS-FM also directs territorial authorities (section 3.5(4)):

> *Every territorial authority must include objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments*

The RPS can provide direction on how a district plan may do this, and the relationship between regional and district plans in managing freshwater aspects of urban development.

165. One of the main roles of district plans is to make decisions on where new urban development should go, and the form of that development. The NPS-FM anticipates that TAs will consider effects on water bodies (including coastal waters) when they make those decisions.

166. Intensification and brownfields development presents an opportunity for positive impacts, particularly in reducing contaminant loads and restoring waterbodies and biodiversity. District plans have a significant role to play in this area.

167. The NPS-FM also requires an integrated approach to planning in relation to managing the effects on fresh water from land use and development (section 3.5(3)):

> *In order to give effect to this National Policy Statement, local authorities that share jurisdiction over a catchment must co-operate in the integrated management of the effects of land use and development on freshwater*

168. Change 1 contains a policy requiring the joint processing of notified resource consents for urban development. Policies relating to the effects from urban development on fresh water and coast direct both district and regional plans. There is overlap with these policies. In considering these policies the respective local authorities must implement them within their respective functions outlined in s.30 and s.31 of the RMA, taking guidance from the RPS policy.

Other national direction

169. Change 1 includes amendments to give effect to the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG). The NPS-REG seeks to enable the development, operation, maintenance and upgrading of renewable electricity generation activities to meet New Zealand's national target for renewable electricity generation (now 100% by 2030). Chapter 3.3 of the RPS includes provisions to enable renewable electricity generation. There are existing wind farms in the region, already helping to reduce emissions from the energy sector, however the region is largely reliant on the electricity network for power (and electricity generated outside the region). Both national grid assets and the local electricity distribution networks are exposed to a range of natural disaster risks, including seismic hazards, coastal flooding and river flooding[49]. The policy package in Change 1 seeks to further encourage and enable small-scale renewable electricity generation where appropriate to give better effect to Policy F of the NPS-REG, and also better recognise the benefits of regionally significant infrastructure that contributes to reducing emissions. The policy package supports increased energy resilience security by supporting local generation.

170. The change to the RPS, also incorporate minor amendments to align with the NZCPS in relation to assessment of natural character in the coastal environment. The NZCPS sets out how the purpose of the RMA will be achieved in relation to the coastal environment.

171. The National Planning Standards Gazetted in April 2019 mandate a structure and format for planning documents. As Change 1 only updates parts of the RPS, it does not seek to fully implement the new structure. The National Planning Standards have been applied as appropriate but are a matter to be addressed in the full review of RPS in the future.

172. Other national policy direction has also informed these changes including:

[49] NIWA, 'Exposure to coastal flooding – 2019', NIWA 'Exposure to river flooding – 2019', and Wellington Electricity Earthquake Reediness 2017 Customised Price -= Quality Path Proposal.

- The Climate Change Response Act 2002 (CCRA) and subsequent amendments through the Climate Change (Zero Carbon) Amendment Act 2019 and Climate Change Response (Emissions Trading Reform) Amendment Act 2020
- National Climate Change Risk Assessment (August 2020)
- New Zealand Emissions Reduction Plan (May 2022)[50]
- National Adaptation Plan (August 2022)[51]
- He Waka Eke Noa – Primary Sector Climate Action Partnership 2022[52]
- Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy
- National Policy Statement-Indigenous Biodiversity (Exposure draft 2022).
- Coastal Hazards and Climate Change (December 2017)[53]
- Risk Based Approach to Natural Hazards under the RMA (June 2016).

173. The Climate Change Response Act 2002 enabled the establishment of the New Zealand Emissions Trading Scheme (NZ ETS), which has been in place since 2008. The NZ ETS puts a price on emissions as high up the supply change as possible (e.g., at the point of refinement or import). A review of the NZ ETS undertaken in 2015/16 found that the scheme did not adequately control the supply of New Zealand Units (units), limiting its effectiveness in reducing emissions. Amendments to the NZ ETS have subsequently been made through the Climate Change Response (Emissions Trading Reform) Amendment Act 2020.

174. While emissions pricing through the NZ ETS is a key policy mechanism to support New Zealand transition to a low emissions economy, it will not be sufficient alone to achieve the emissions reductions needed by 2050 or meet emission budgets[54]. In 2021, He Pou a Rangi the Climate Change Commission recognised that other actions are required to address barriers and enable innovation and system transformation as some sectors do not respond well to emissions pricing. For example, urban form and development and transport are more influenced by existing infrastructure and long-lived assets. Even for those sectors where decision-making could be influenced by emission pricing (e.g., industry and agricultural), the Commission found that NZ ETS alone will not likely deliver the new technologies and processes required to achieve the required levels of emission reductions[55]. This is reiterated in the Commission's most recent advice to the Government (July 2022) finding that "A fit-for-purpose NZ ETS is essential, but on its own is not sufficient to deliver the sustained, inclusive and equitable change at the pace and scale we need. A package of well-designed complementary policies is also needed to drive efficiency, foster a sustainable transition, and tackle the market failures blocking action.[56]"

175. The NZ ETS seeks to drive behaviour change simply by influencing price. It does not factor in matters such as where or how emissions would be best reduced to improve greater social, environmental, cultural and economic wellbeing. The planning/resource management system by contrast provides a decision-making framework for land use planning, the management of natural resources and consideration of social, environmental, cultural and economic values. Planning decisions can lock in specific land uses and activities for generations. This is recognised in the Emissions Reduction Plan, which also noted that planning can drive climate action in almost every sector[57]. Resource management approaches and plan provisions can therefore be an effective

[50] Emissions reduction plan | Ministry for the Environment
[51] National adaptation plan | Ministry for the Environment
[52] He Waka Eke Noa - Primary Sector Climate Action Partnership | Ministry for the Environment
[53] Coastal hazards and climate change: Guidance for local government | Ministry for the Environment
[54] He Pou a Rangi Commissioner Catherine Leining Insight: Why the ETS alone won't get us to net zero emissions
[55] He Pou a Rangi the Climate Change Commission (2021) Ināia tonu nei: a low emissions future for Aotearoa.
[56] https://ccc-production-media.s3.ap-southeast-2.amazonaws.com/public/ETS-advice-July-22/PDFs/NZ-ETS-settings-2023-2027-final-report-web-27-July-2022.pdf
[57] Ministry for the Environment (2022) '*Te hau mārohi ki anamata Towards a productive, sustainable and inclusive economy – New Zealand's First Emission Reduction Plan', pg.99, refer: Aotearoa New Zealand's first emissions reduction plan (environment.govt.nz)*

means of achieving behaviour changes in areas unaffected by/less responsive to the NZ ETS as part of the required comprehensive response to respond to the climate emergency.

176. The Climate Change Response (Zero Carbon) Amendment Act 2019 ('Zero Carbon Amendment Act') provides a framework for New Zealand to develop climate policies that contribute to global efforts to limit average temperature increase, and to allow for the preparation and adaptation to the effects of climate change. This Amendment Act set up new domestic GHG emissions targets, established a Climate Change Commission and requires government to development and implement policies for climate mitigation and adaptation. The Ministry for the Environment is leading the coordination and development of the National Climate Change Risk Assessment and the National Adaptation Plan, in response to this Amendment Act.

177. The Government has prepared an economy-wide Emissions Reduction Plan. The Emissions Reduction Plan sets out how New Zealand will meet its first emissions budget (2022-2025) and the path to meeting our long-term climate targets. It is a key step in the country's transition to a low emissions future. The Emissions Reductions Plan recognises that a broad range of range of regulatory measures and complementary initiatives will be required to achieve the timeframes and emissions targets established by the CCRA. It states "…*emissions pricing alone cannot support our transition in an equitable way. A high reliance on emissions pricing without complementary measures would fail to achieve many low-cost emissions reduction opportunities due to the presence of other barriers. This approach would be unlikely to enable us to meet our climate goals and is considered to have the highest economic cost. Instead, a mix of regulation and policies, such as innovation, equitable transition measures, behaviour change and finance, are needed alongside emissions pricing*"[58]. The Emission Reduction Plan also recognises the role of planning to reduce greenhouse gas emissions with Chapter 6 setting out a range priority actions to reduce greenhouse gas emissions through the planning system.

178. The Emissions Reduction Plan establishes that the planning system and investment in infrastructure needs to support emissions reductions across the transport, building and construction, forestry and nature-based solutions, energy, waste and agriculture sectors (Chapter 7). Other key recommendations in the Emissions Reduction Plan relevant to RMA planning and Plan Change 1 include reducing reliance on cars and support public and active transport (chapter 10), increasing renewable electricity and reducing industrial emissions (chapter 11), supporting afforestation and encouraging natives (chapter 14).

179. The National Adaptation Plan brings together the Government's efforts to help build climate resilience and sets out the proposed future priorities and work programme. The National Climate Change Risk Assessment 2020 identified 43 priority risks that Aotearoa faces from climate change and outlined the 10 most significant risks across five domains; natural, human, economy, built and governance. The National Adaptation Plan must address the most significant risks. Four priorities underpin the plan:

- Enabling better risk-informed decisions;
- Driving climate-resilient development in the right places;
- Laying the foundations for a range of adaptation options including managed retreat and;
- Embedding climate resilience across government policy.

180. The National Adaptation Plan includes actions that relate to system-wide issues and five key areas that broadly align with the domains identified in the risk assessment. A number of the critical actions identified in the plan are being incorporated into RPS Change 1 including;

[58] Ministry for the Environment (2022) '*Te hau mārohi ki anamata Towards a productive, sustainable and inclusive economy – New Zealand's First Emission Reduction Plan', pg.99, refer:* Aotearoa New Zealand's first emissions reduction plan (environment.govt.nz)

- Supporting Māori to adapt to the impacts of climate change;
- Direction to manage the impacts of climate hazards on communities and the natural and built environment;
- Providing information and raising awareness of climate change and natural hazards;
- Supporting the development and implementation of climate adaptation plans including actions that support managed retreat;
- Direction to support and prioritise nature-based solutions;
- Direction to restore and enhance indigenous ecosystems and biodiversity;
- Policy support to implement national direction on NPS-FM, proposed NPS-IB and the NZCPS.

181. He Waka Eke Noa is a primary sector climate action programme of work which was in development at the time of preparing Change 1. The purpose of the framework is to reduce agricultural greenhouse gas emissions and build the agriculture sector's resilience to climate change. The framework includes measuring and managing on-farm emissions, increasing sequestration on farms, adapting to climate change and incentivising farmers through a pricing mechanism[59]. Elements of the framework have been introduced and recommendations on the pricing mechanism were made by He Waka Eke Noa in May 2022. The development of the framework to date is informed by a body of technical evidence on greenhouse gas emissions and the agriculture sector. Central government has indicated that a decision on pricing agricultural emissions will be made by the end of 2022 to enable implementation by 2025. These decisions will be informed by the recommendations of He Waka Eke Noa and advice from the Climate Change Commission on those recommendations.

182. An exposure draft of the National Policy Statement for Indigenous Biodiversity (NPS-IB) was released for consultation by the government in June 2022. The purpose of the NPS-IB is to set out an objective and policies in relation to maintaining indigenous biodiversity, and to specify what local authorities must do to achieve that objective. It is therefore directly relevant to the Indigenous Ecosystems chapter of the RPS. The intent is that the NPS-IB will be gazetted in December 2022 taking into account feedback through the exposure draft process. Local authorities must publicly notify any changes to their policy statements necessary to give effect to the NPS-IB within 8 years after the commencement date although plan changes relating to the identification and protection of 'significant natural areas' must be notified within 5 years of commencement date (this primarily relates to district plans). However, to the extent that policy statements already give effect to the NPS-IB, local authorities are not obliged to make changes to wording or terminology merely for consistency with it. The NPS-IB applies to the terrestrial environment only with limited exceptions[60].

183. Change 1 is an important opportunity to align the RPS with the imminent NPS-IB. While this is at exposure draft stage now (so not gazetted), the direction is clear and if the NPS-IB is gazetted later this year as intended by the government, Council can address any matters of misalignment through the Schedule 1 process.

184. The Coastal Hazards and Climate Change guidance document released in 2017 by the Ministry for the Environment and was a major revision of the 2008 edition. It included advances in hazard, risk and vulnerability assessments, collaborative approaches to community engagement and changes to statutory frameworks. It outlines adaptive approaches to planning for climate change in coastal communities, including integrating asset management into such planning.

[59] Decisions on the pricing mechanism are due to be made in late 2022 with implementation from 2025.
[60] The NPS-IB also applies to geothermal ecosystems, specified highly mobile fauna that may use the CMA or water bodies as part of their life cycle, and NPS-IB provisions relating to restoration include wetlands.

185. In 2016 Tonkin & Taylor produced a guidance report for the Ministry for the Environment entitled Risk Based Approach to Natural Hazards under the RMA[61]. It provides a framework for a risk-based approach for managing and planning for natural hazards under the Resource Management Act (RMA). MfE intends that this framework will become the foundation for a National Policy Statement and other national level guidance or interventions on natural hazards, providing consistency across the country. This guidance built on earlier work by GNS Science released in 2013 that looked at risk-based approaches for land use planning for natural hazards reduction[62].

RMA regional plans

186. The Proposed NRP (PNRP) for the Wellington Region was prepared with the regional community and in partnership with the region's mana whenua / tangata whenua to help people sustainably manage natural and physical resources within the Wellington region. It was publicly notified in July 2015. The PNRP brought together the five existing regional plans (air, soil, fresh water, discharge to land, and coastal plans) for the Wellington Region into one integrated document. Following formal notification, hearing, decisions, appeals and final decisions, the NRP will be made operative in the second half of 2022. Final consent orders were issued by the Environment Court in June 2022, and final approval/operative processes are underway.

187. The PNRP set up a framework to support the progressive implementation of the original NPS-FM 2011 which has since undergone various amendments in 2014, 2017 and 2020. The PNRP includes a set of region-wide provisions along with five whaitua specific chapters.

188. The process of finalising all content of the PNRP over a seven-year period since notification, provides current context, stakeholder positions, and significant evidence in support of the final content. This has contributed to confirming aspects of the relevant issues and responses for this Change 1.

Wellington Regional Growth Framework (WRGF) and the Future Development Strategy (FDS)

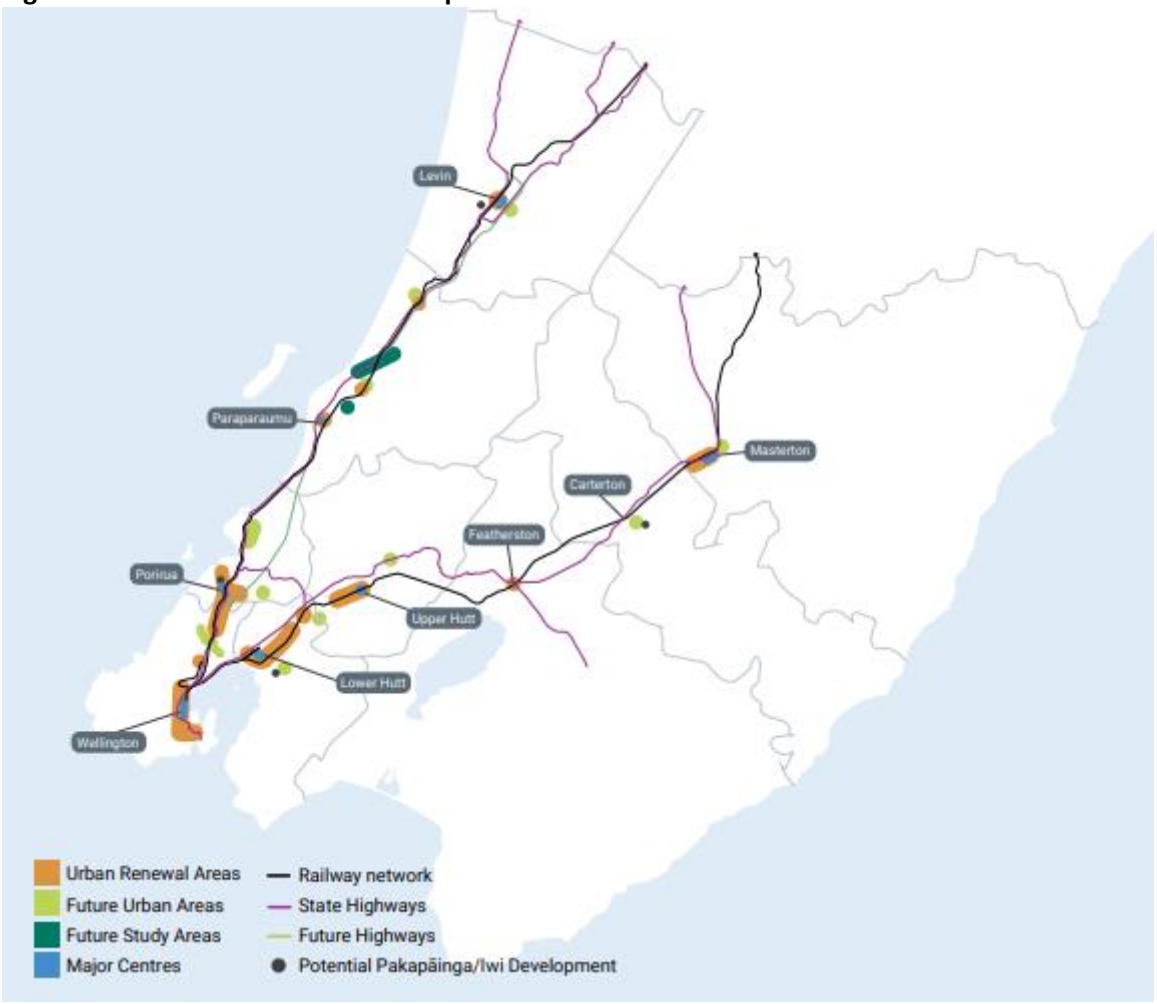
189. The objectives for the Wellington Region[63] over the next 30 to 100 years are:

- Increase housing supply, and improve housing affordability and choice
- Enable growth that protects and enhances the quality of the natural environment and accounts for a transition to a low/no carbon future
- Improve multi modal access to and between housing, employment, education and services
- Encourage sustainable, resilient and affordable settlement patterns/urban forms that make efficient use of existing infrastructure and resources
- Build climate change resilience and avoid increasing the impacts and risks from natural hazards
- Create employment opportunities.

190. The WRGF identifies constraints, challenges, key moves required, and some specific initiatives to work towards the objectives. The identified future urban form, taking account of constraints, infrastructure, and other priorities, is illustrated in the WRGF as shown in **Figure 3**.

[61] Risk Based Approach to Natural Hazards under the RMA. Prepared for Ministry for the Environment by Tonkin & Taylor Ltd, June 2016.
[62] Saunders, W. Beban, J & Kilvington, M. (2013), Risk Based land use planning for natural hazards risk reduction. GNS Science Miscellaneous Series 67, September 2013.
[63] The Wellington Regional Growth Framework applies to the Wellington Region and the Horowhenua District. The Wellington Regional Policy Statement does not apply to Horowhenua.

Figure 3: WRGF Future urban development areas



191. A Future Development Strategy (FDS) for the Wellington region will be required in accordance with subpart 4 of the NPS-UD. The Future Development Strategy will set out the high-level vision for accommodating urban growth over the long term, and identifies strategic priorities to inform other development-related decisions, such as:

- district plan zoning and related plan changes;
- priority outcomes in long-term plans and infrastructure strategies, including decisions on funding and financing; and
- priorities and decisions in regional land transport plans.

192. The FDS will provide a framework for achieving Well-Functioning Urban Environments in the Wellington Region, including specifying how and where future growth will occur to provide for sufficient capacity to meet future growth needs over the next 30 years.

193. While the WRGF provides components of a FDS, it does not meet all of the requirements of subpart 4, in particular, the growth direction has not been based on the HBA for the Wellington Region. It is anticipated that the WRGF will form the FDS in its next iteration.

194. Change 1 seeks to utilise work undertaken during the WRGF process, provide for the FDS to provide direction for achieving well-functioning urban environments and provides recognition to the WRGF within the RPS.

Planning documents recognised by iwi authorities

195. The iwi management plans lodged with Council are:

- Whakarongotai o te moana, Whakarongotai o te wā, Kaitiakitanga Plan for Te Ātiawa ki Whakarongotai 2019
- Parangarahu Lakes Area Co-Management Plan lodged by Port Nicholson Block Settlement Trust
- Wellington Harbour Islands Kaitiaki Plan 2012–2017 lodged Port Nicholson Block Settlement Trust
- Ngāti Raukawa Ōtaki River and Catchment Iwi Management Plan 2000.

196. In addition to those above, there are also other influential iwi authority planning documents that have informed and directed the development of Change 1:

- Te Mahere Wai o Te Kāhui Taiao – A Mana Whenua whaitua implementation plan to return mana to our freshwater bodies (2021) by Te Rūnanga o Toa Rangatira and Taranaki Whānui ki te Upoko o te Ika for Greater Wellington Te Pane Matua Taiao.
- Te Awarua-o-Porirua Whaitua Implementation Programme: Ngāti Toa Rangatira Statement (2019) by Ngāti Toa Rangatira.

Other regional strategies, plans and policy influencing Change 1

197. The Whaitua Implementation Programmes are a key regional natural resource management document, including providing recommendations for both regulatory and non-regulatory implementation. These are described further above in (refer description starting at paragraph 35), particularly how the Whaitua Implementation Programmes contribute to implementing the NPS-FM.

198. A Regional Climate Emergency Action Plan[64] sets out the Greater Wellington Regional Council priorities to combat climate change. The Action Plan was developed following the Council declaring a climate emergency in 2019. Greater Wellington Regional Council also developed a Climate Change Strategy in 2015[65]. The strategy sets out the Council's commitment to taking a proactive approach to managing the risks associated with a changing climate, to reducing the emissions associated with its activities, and to enhancing the region's resilience by applying an adaptive pathways approach to its planning processes.

199. The Greater Wellington Biodiversity Strategy 2016[66] sets a framework that guides how Greater Wellington Regional Council protects and manages biodiversity in the Wellington region. The Biodiversity Strategy sets the Council's vision, principles, goals and objectives for biodiversity, identifies the Council's core functions that relate to achieving the objectives of the strategy, and identifies which departments are responsible for or contribute to carrying out those functions.

200. Wellington Region Natural Hazards Management Strategy 2017[67] sets a framework that allows the partner councils in conjunction with key stakeholders and the community to develop consistent responses to the challenging natural hazards that Wellington faces. The purpose of the strategy is to help create a region resilient to the impacts from natural hazard events through a focus on the reduction of risks to human life and property from hazards. One of the key goals of the strategy is to better align hazard risk management planning in the Wellington region by creating consistency in the natural hazard provisions in regional and district plans. The RPS plan change formalises this

[64] https://www.gw.govt.nz/assets/Documents/1970/01/Regional-Climate-Emergency-Action-Plan.pdf
[65] GWRCClimateChangeStrategy7-10-15.pdf
[66] https://www.gw.govt.nz/assets/council-publications/Biodiversity-Strategy-2016.pdf
[67] https://archive.gw.govt.nz/assets/Uploads/Wellington-region-natural-hazards-management-strategyMay-2019.pdf

goal and sets the statutory direction for the implementation of a risk-based hazard management approach.

201. Wellington Regional Land Transport Plan 2021[68](RLTP) sets the direction for the Wellington Region's transport network for 10-30 years. The RLTP describes Greater Wellington Regional Council's long-term vision, identifies regional priorities and sets out the transport projects the Council intends to invest in over the first six years of the RLTP implementation.

[68] https://gwrc.govt.nz/assets/Documents/2021/10/Wellington-Regional-Land-Transport-Plan-2021web.pdf

PART B EVALUATION OF THE PROPOSED CHANGE

202. Part B of this report focuses on the proposed objectives and provision options for the RPS and is structured as follows:

- An outline of the evaluation approach
- A summary of the preferred option (i.e. the proposed Change 1)
- Summary tables of the evaluation undertaken for each topic.

203. The summary tables are presented in topic areas for ease of reading and follow the order of the RPS. However, the preferred option consists of the full suite of changes, which have been considered as an integrated whole in determining they are the appropriate response.

6.0 APPROACH TO EVALUATION OF THE OBJECTIVES AND PROVISIONS

204. This section of the report first sets out the regional context (or 'setting') for the evaluation of Change 1 and then describes the approach that was taken to that evaluation. The evaluation approach is described in three steps:

- An general overview, including how the scale and significance of the changes are relevant to the level of evaluation
- The assessment of the appropriateness of the proposed objectives, or purpose to the changes
- The assessment of the efficiency and effectiveness of the proposed policies and other provisions.

205. The findings from the evaluation using this approach are set out in Section 8.0 and Section 9.0.

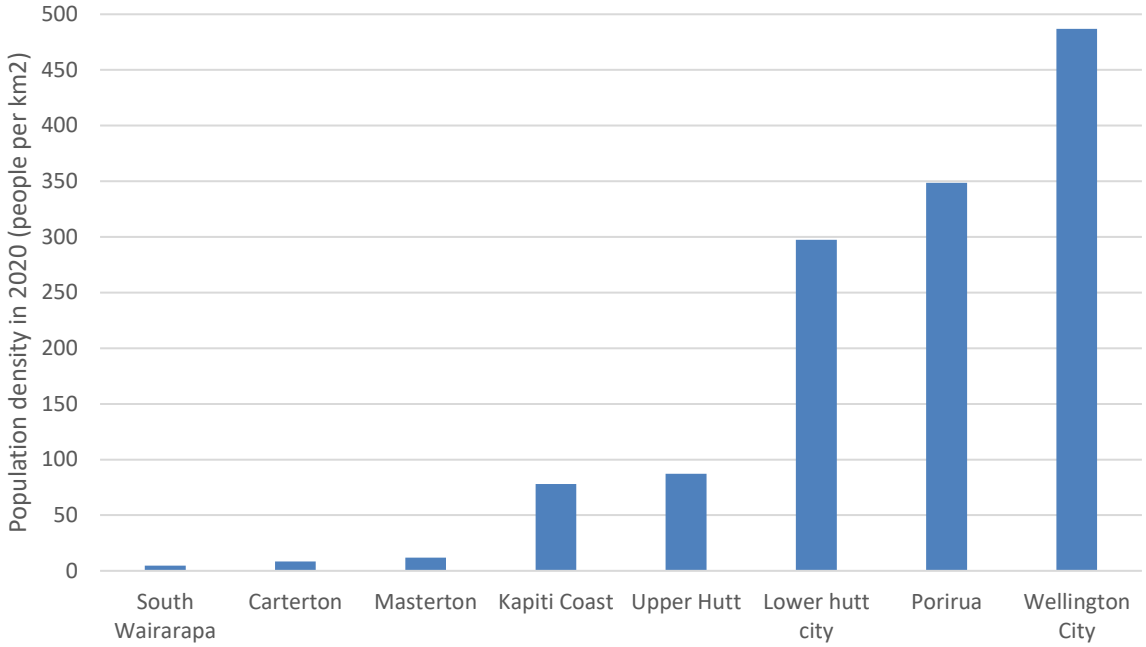
Regional context in evaluating objectives and provisions for the RPS

206. By design, new policy alters the incentives that people and communities face, and this change creates potential impacts. The nature of those impacts depends, in part, on how people respond to change, which is influenced by their existing circumstances and future plans. How impacts play out is determined by complex patterns of factors, including our values, natural resources and hazards, and economic activities – all of which vary across the region. These patterns, as well as the interconnections between topics, means that everyone's experience of Change 1 is likely to be unique. Although it is challenging to forecast impacts, a large body of existing knowledge and understanding on the Greater Wellington Region has informed the development of objectives and provisions.

207. In the Wellington Region, there is a population of around 542,000 people (2020 estimate) with 94 percent of people living in urban areas. By comparison, 83 percent of people live in urban areas across New Zealand. This proportion has been relatively stable for the last 15 years.[69] However, there are notable differences across the region, for example, South Wairarapa District has 64 percent of people living in urban areas. **Figure 4** shows estimates of population density for districts in the region.

[69] MBIE regional economic activity data web tool: Regional economic activity report (mbie.govt.nz)

Figure 4: Population density by district (2020)



208. In the Wellington Region, 75.2 percent of the population identify as European/pakeha, 14.4 percent Māori, 13.4 percent Asian, and 8.6 percent Pacific. Porirua (22 percent) and Lower Hutt (10 percent) have populations with the highest proportion of Pacific Peoples in the region. Both areas also have the populations with the highest proportion of Māori (18 percent and 16 percent respectively). Population projections show that Māori and Pacific communities will grow further in proportion in these two areas by 2038. Wellington City has the highest proportion of Asian and MELAA (Middle Eastern, Latin American and African) communities in the region, at 17 percent and 3 percent respectively. Wellington City also has the highest proportion of overseas-born population, at 32 percent[70].

209. The age profile also varies considerably across the region. A third or more of Porirua's population (37 percent) and Lower Hutt's population (33 percent) are children and young people aged 0–24 years. The majority of children and young people in Porirua identify as Māori or Pacific. Wellington City has the largest youth population aged 15–24 years. The age profile of all areas is projected to age. This trend is most noticeable in Kāpiti Coast, which has the highest median age. By 2038, the proportion of over 65 year olds in the Kāpiti Coast is expected to increase to over a third of the population (34 percent).[71]

210. In the Wellington metropolitan area, socio-economic deprivation is highest in Porirua and Lower Hutt, and lowest in Upper Hutt, Wellington City and Kapiti Coast. The 2018 NZ Deprivation Index (NZDep18) describes New Zealand's living areas using ten decile bands with 10 percent of the population in each band. The decile 10 band has the highest level of deprivation and the decile 1 band has the lowest deprivation. Lower Hutt has the highest average NZDep18 score in the Wellington metropolitan area of 5.8; with 21 percent (21,549) of the population in that area living in deciles 9–10. However, 44 percent of people in Porirua live in deciles 9–10. This equates to 24,891 people and is over twice the national average (10 percent of the population live in each decile). Only one percent of people in Wellington City live in deciles 9–10.[72] People who identify as Māori and/or Pacific Peoples are over-represented in areas of highest deprivation. In Porirua,

[70] Ethnicity figures and projections from Wellington Community Trust Regional Community Profile, report October 2020 (using 2018 Census)
[71] Data from Wellington Community Trust Regional Community Profile, report October 2020 (using 2018 Census). The WCT study area is metropolitan districts and does not include Wairarapa.
[72] Data from Wellington Community Trust Regional Community Profile, report October 2020 (using 2018 Census and NZ Deprivation Index 2018))

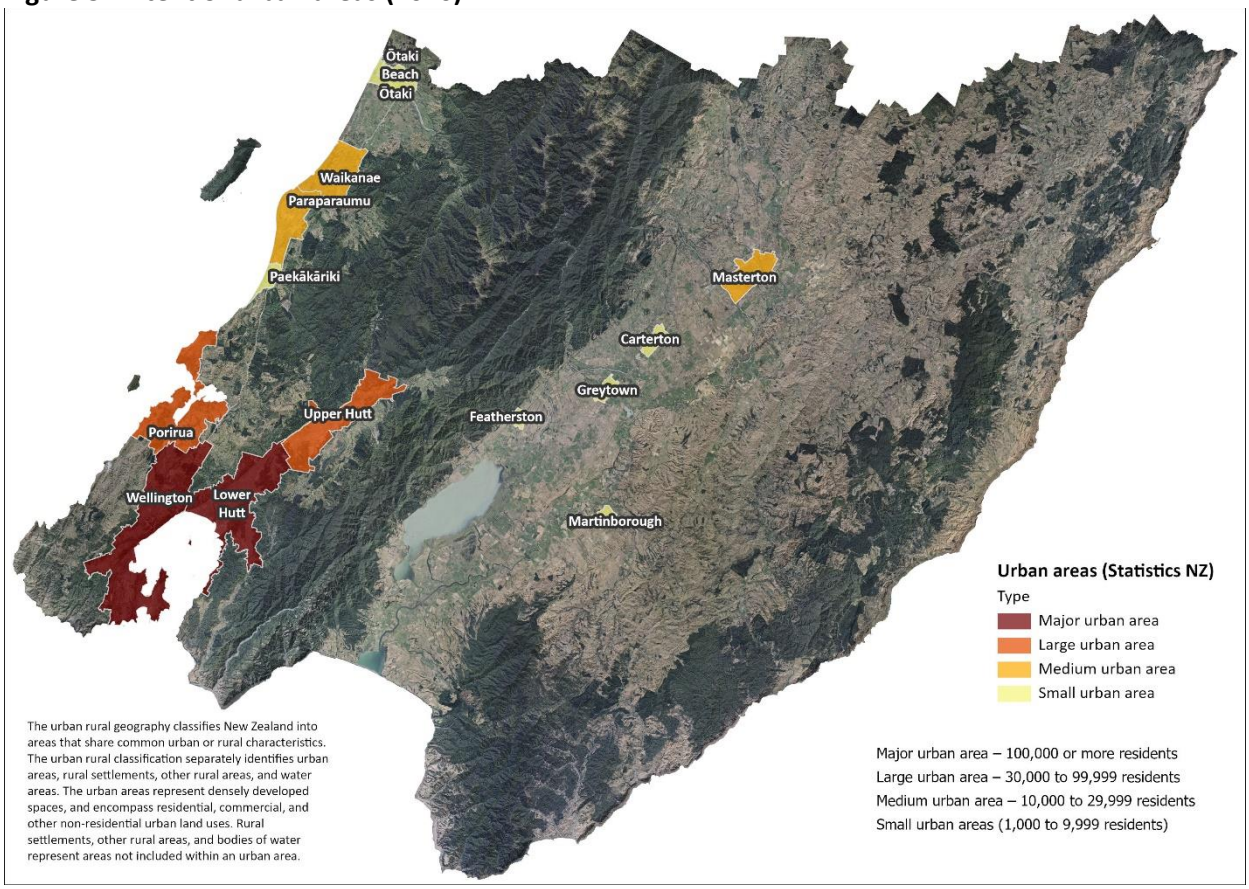
Pacific Peoples are more than three times as likely as NZ Europeans to live in deciles 9–10, and Māori are more than twice as likely. More children and young people live in areas of highest deprivation than other age groups – particularly in Porirua and Lower Hutt.

211. The WRGF aims to provide for a population increase of 200,000 additional people in the next 30 years. The WRGF involves partnerships, planning and initiatives to support that growth.

212. The use of transport is linked to the population patterns and access to public transport or active transport option. Wellington Regional transport trips which are either on public transport or active mode, makes up 28 percent of trips. [73]

213. While the proportion of urban population is very high, the urban areas in the Wellington Region are relatively concentrated, and the amount of non-urban land is an extensive part of the region, as shown in **Figure 5**.

Figure 5: Extent of urban areas (2020)



214. Household incomes are higher in Wellington compared to New Zealand, with a median household income of $103,900 (2019) being the highest region in New Zealand and compared to $92,000 for New Zealand. With 41.3 percent of households earning more than $100,000 in 2018, this is considerably higher than the 34.3 percent of households nationally.[74]

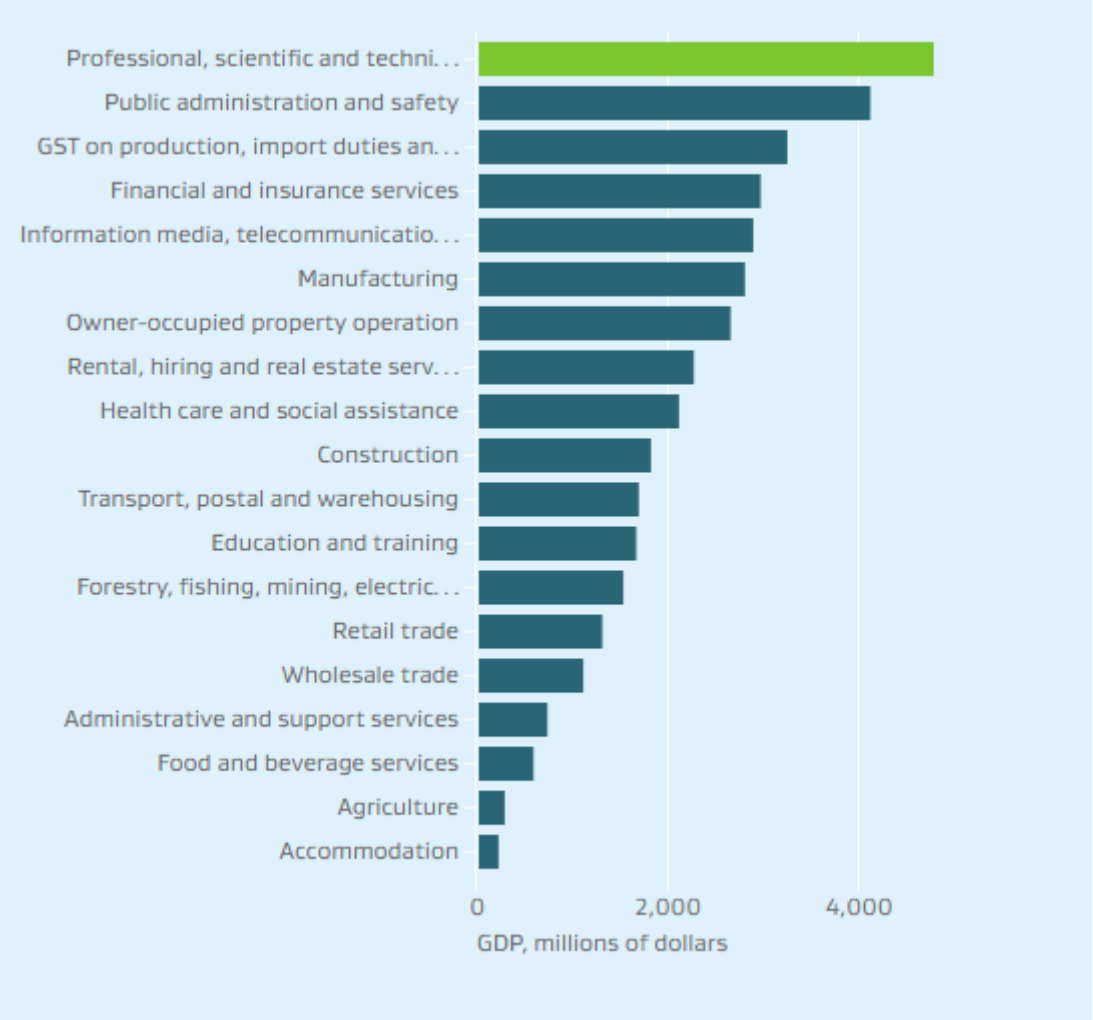
215. The region has employment and income inequities with the greatest inequities experienced by MELAA communities. Median personal incomes are highest for people in Wellington City ($40,550) and lowest for people in Kāpiti Coast ($30,500). Employment rates and median incomes are much higher for NZ Europeans than for other ethnic groups in the region. People who identify as MELAA

[73] WRGF, 2018 data for Wellington Region
[74] MBIE regional economic activity data web tool: Regional economic activity report (mbie.govt.nz)

have the lowest median personal incomes – particularly in Upper Hutt ($18,050), Lower Hutt ($18,900) and Porirua ($20,350).[75]

216. GDP by industry for the Wellington Region in 2019 shows the spread of industries represented within the economy, with administrative and professional service sectors dominating the economy, reflecting Wellington being the capital city. GDP by industry sector is shown in **Figure 6**. In Wellington, 12.5 percent of GDP comes from professional services (compared to 8.0 percent for New Zealand).

Figure 6: Wellington Region GDP by industry [76]



217. While only 0.7 percent of Wellington's GDP comes from agriculture (compared to 4.1 percent of GDP for New Zealand), there is a significant range between territorial authority areas with the share of South Wairarapa's GDP coming from agriculture being 22.8 percent, Masterton 7.9 percent and Kapiti Coast 1.6 percent.

218. Across the region, the contribution of individual agriculture industries to regional GDP in 2018 were:

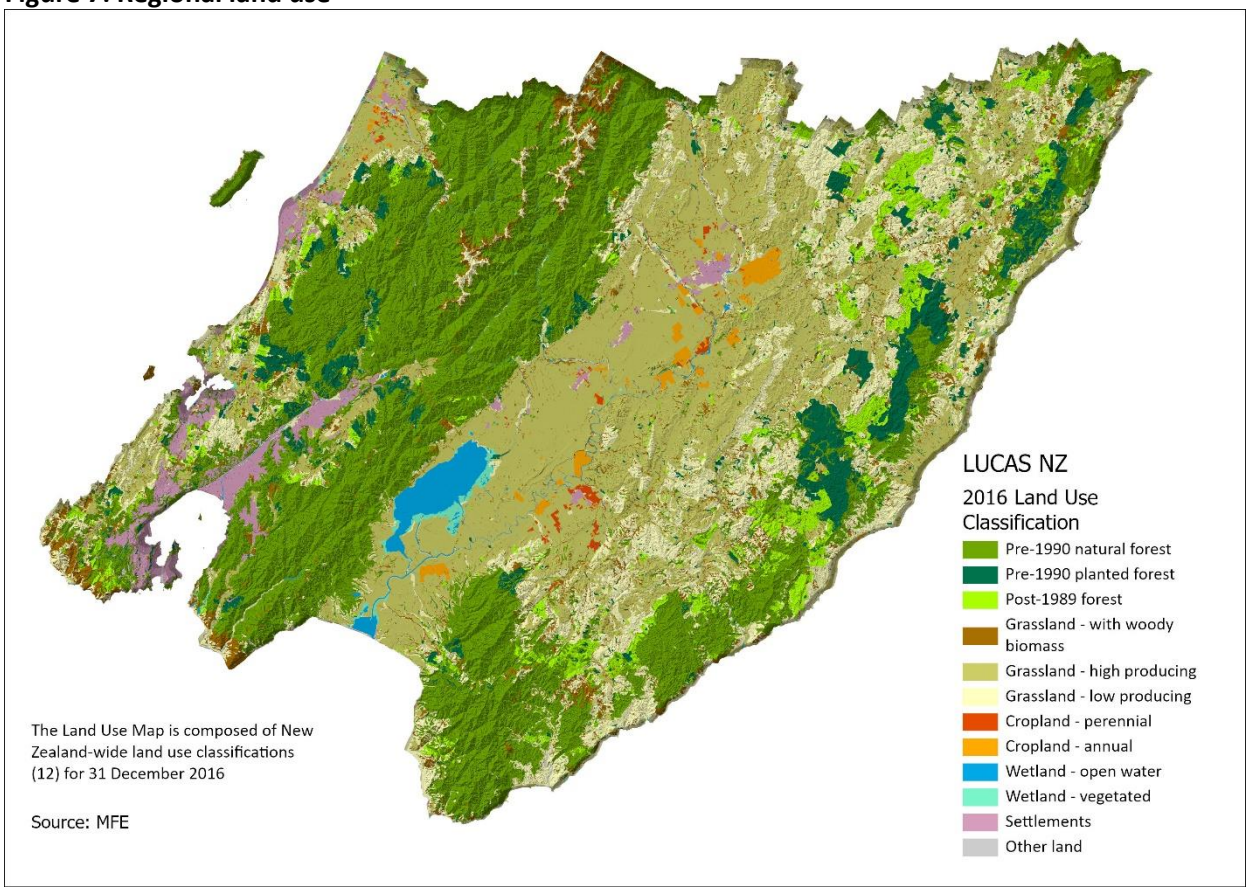
- Sheep, beef and grain: 0.2 percent
- Forestry and logging: 0.1 percent
- Poultry, deer and other livestock: 0.1 percent

[75] Data from Wellington Community Trust Regional Community Profile, report October 2020 (using 2018 Census)
[76] MBIE regional economic activity data web tool: Regional economic activity report (mbie.govt.nz)

- Agriculture, forestry and fishing support services: 0.1 percent
- Dairy: 0.1 percent
- Horticulture and fruit: 0.1 percent
- Mining: 0.1 percent
- Fishing and aquaculture: <0.1 percent.

219. Land use types vary across the region and are illustrated in **Figure 7**. Land use patterns will impact how Change 1 is experienced. For example, where amended provisions relate to urban areas, indigenous ecosystem areas, fresh water bodies, agriculture, locational hazards, or other matters that have a geographical focus within the region. For the Wellington Region, 11 percent of land is classified as highly versatile soils.[77] The areas of high producing capability are shown in the land use map in Figure **7**.

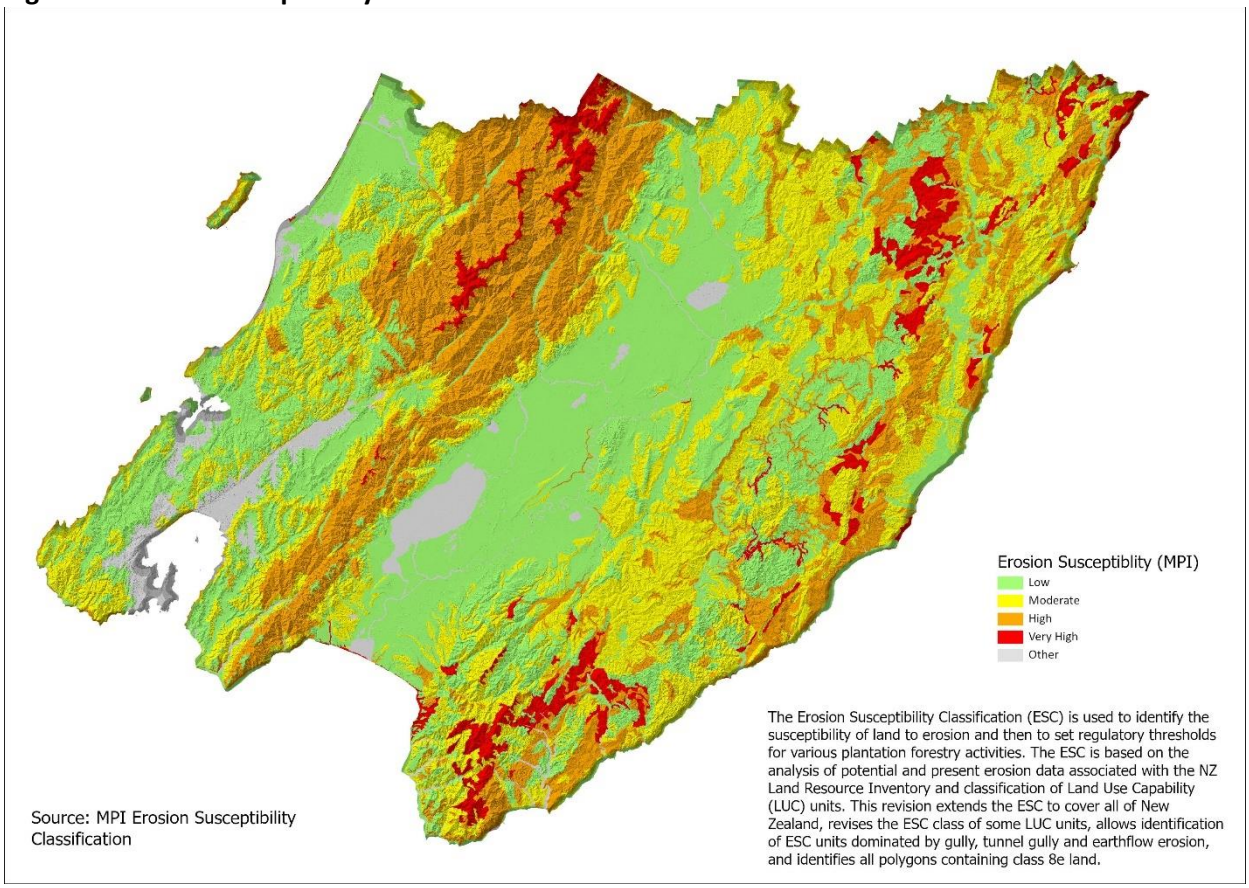
Figure 7: Regional land use



220. Some parts of the region are highly susceptible to erosion. This is a factor in achievement of water quality targets, and also provides context where increased permanent forest could provide co-benefits for water quality, indigenous biodiversity and carbon sequestration. Erosion susceptibility across the region is shown in **Figure 8**.

[77] the Land Use Capability system classifies land into eight classes according to its long-term capability to sustain one or more productive uses. Classifications 1-3 is the land with the most versatile soils, sometimes referred to as 'high class' soils. Versatile soils are rare in New Zealand (approx. 5.5% of New Zealand is classified as highly versatile) and these soils are of high value for food production. Percentage figure from Wellington Regional Growth Framework.

Figure 8: Erosion susceptibility



Overview of Evaluation approach

221. The overall approach adopted in evaluating the proposals and options for Change 1 followed accepted practice in policy evaluation, guided by specific requirements of RMA Section 32.[78] The process involved the following steps:

- Identifying the requirements from NPS and other national direction relevant to RPS to define scope of issues to include in Change 1
- Defining the resource management issues related to the scope, including gathering of data and evidence on the issues
- Identifying outcomes of WRGF, Whaitua and PNRP processes linked to Change 1
- Considering evaluation approaches in the timeframe available (from early 2021 to mid-2022)
- Developing and implementing a plan for partnership and engagement with external and internal parties
- Working directly with the six mana whenua / tangata whenua partners to identify interests, process and timing
- Developing objectives in response to the issues, including workshops, meetings and consultation externally and internally to evaluate, consider and refine objectives
- Identifying policy packages and options for provisions to implement the objectives based on knowledge of current RPS, other Greater Wellington Regional Council RMA implementation, other Greater Wellington policy and decision making, guidance on national direction, understanding of options being considered by other regional councils, policy options internationally. This step including workshops, meetings and consultation externally and internally to evaluate, consider and refine options

[78] Refer MfE: A guide to section 32 of the Resource Management Act. A guide to section 32 of the Resource Management Act | Ministry for the Environment

- Further evaluation and analysis of some options with input from specialists in fresh water, climate change and biodiversity
- Reviewing the efficiency and effectiveness tests for options based on all steps worked through, in line with section 32
- Deciding preferred option and drafting amendments for preferred option
- Formal consultation on the draft Change 1 and feedback received
- Further evaluate and consider preferred options
- Document evaluation (this report)
- Finalise all proposals.

222. The evaluation was constrained by time (August 2022 NPS-UD deadline), and had a narrow focus related to the national direction. This scope and timing was a constant check on the scale and depth of the evaluation and engagement processes. Evaluation will be ongoing as the Change 1 process continues.

223. Section 32(1)(c) of the RMA requires that the evaluation of proposed changes to RMA policy statements contain a level of analysis that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal.

224. The level of detail in this evaluation was determined by considering the effects anticipated from the proposed objectives and policies in the RPS relative to a baseline. The baseline consists of the status quo plus the effects anticipated by NPS, other national instruments, or other existing strategic documents which provide direction relevant to this RPS change. A lot of the proposed changes in Change 1 are already a baseline as it is anticipated to occur in national documents. The effects of Change 1 to be evaluated are those that are additional to the effects that will result from the direct implementation of specific national direction at a regional scale.

225. Based on this, the scale and significance of anticipated effects associated with this proposal are identified below:

Criteria	**Scale/Sig-nificance**	**Comment**
Rationale for undertaking the change now	Low	• Changes are needed to give effect to national direction
Degree of effect relative to status quo and national direction – Urban development	Med	• Changes largely reflect the direction of the National Policy Statement on Urban Development. Additional urban development changes reflect commitments identified in the Wellington Regional Growth Framework. • Proposed RPS provisions for environmental integration with urban development are additional to a sole focus on NPs-UD but the integrated approach provides clear guidance that aligns urban development with other topics of the RPS.
Degree of effect relative to status quo and national	Med	• Changes are required to be made to the RPS to give effect to the NPS-FM. • Changes to the RPS are as anticipated by the NPS-FM, and aligned to the whaitua outcomes.

Criteria	Scale/Sig-nificance	Comment
direction - Freshwater		• The development of visions aligned to Te Mana o te Wai and the RPS provisions to support this, is a step change in resource management compared to the current RPS. • Direction to Territorial Authorities in relation to their role in freshwater management (in the NPS-FM) is a step change from current approach.
Degree of effect relative to status quo and national direction – Indigenous ecosystems	Low	• Changes to the RPS provide for the maintenance of indigenous ecosystems and habitats – both within and outside of significant biodiversity areas /significant natural areas. • Changes also recognise and provide for the critical role that indigenous ecosystems play in the provision of ecosystem services, including for climate change mitigation and adaptation. • Changes more fully recognise and provide for Māori values for indigenous biodiversity and their role as kaitiaki, and to better recognise the role of landowners and community members as stewards of indigenous biodiversity. • These changes respond to the directives of the Aotearoa New Zealand Biodiversity Strategy and are better aligned with the policy direction and implementation requirements signalled in the exposure draft NPS-IB (intended to be gazetted end of 2022).
Degree of effect relative to status quo and national direction – Climate change	Medium	• A new Climate Change chapter has been introduced to respond with appropriately bold and ambitious actions to the declaration of a Climate Emergency by Greater Wellington in 2019, and the call for urgent climate action by He Pou a Rangi the Climate Change Commission in 2021. The new provisions will support the existing national effort articulated in the Climate Change Response Act 2002 and the National Emissions Reduction Plan (2022) to achieve net zero emissions by 2050. The Emission Reduction Plan recognises that achieving New Zealand's emission reduction will require a mix of emission pricing, regulation and supporting initiatives, with a number of key actions delivered directly or indirectly through the planning system. The new Climate Change chapter will also assist our communities to prepare for, and adapt to, the effects of unavoidable climate change, in alignment with the National Adaptation Plan. • The introduction of climate change focused objectives, targets and provisions integrated across topics to achieve emissions reductions from transport, agriculture, energy, waste and industry, with the support of nature-based solutions, represents a significant step-change in resource management focus in the region. However, this is justified by the need for collaborative action across the world to limit global warming to a level that will avoid the most catastrophic impacts of climate change. The need for significant change is recognised at the international, national and regional level, as is the need for resource management approaches to climate change mitigation alongside emission pricing and other policy initiatives[79].

[79] As evident through the 2020 amendments to enable local authorities to regulate and consider the discharge of GHG emissions on climate change and the broad range of actions in the Emission Reduction Plan directly and indirectly relating the resource management/planning system.

Criteria	Scale/Sig-nificance	Comment
		• A more comprehensive set of provisions to provide for urban and rural climate change adaptation and mitigation provides a shift from the current RPS, in response to the significant risks to the health, safety and well-being of people and nature from the current and future effects of climate change. • A new objective and policy and amendments to the existing hazard provisions have been made to account for the important links to social and environmental values for better integrated management of natural hazard mitigation and adaptation activities. These changes also give effect more fully to the New Zealand Coastal Policy Statement and exposure draft NPS-IB (intended to be gazetted end of 2022) and better aligned with national direction in hazards risk management contained in the Ministry for Environment Coastal Hazards and Climate Change Guidance 2017, the National Adaptation Plan and risk-based natural hazards management.
Degree of effect relative to status quo and national direction – Other changes	Low	• Other changes to definitions, policies and explanatory material are minor and necessary to aid implementation as intended by status quo or by national instruments, including NZCPS (re natural character).

226. Overall, the proposed changes are considered to have low-medium scale and significance in addition to national direction. The implementation of the changes will have impacts, particularly during the transition phase, and this is described in the evaluation sections below.

227. The changes will address long standing resource management issues and will be aligned to provisions anticipated by national direction and regional strategic documents. Impacts of the policy changes are expected to be both positive and negative, and they will largely be determined and managed through subsidiary documents, including the Natural Resources Regional Plan and District Plans.

228. Considering the low-medium scale and significance of the proposed changes, the following section outlines the approach to evaluating those changes.

Assessment of appropriateness of objectives

229. Section 32(1)(a) requires an evaluation of the extent to which the objectives are the most appropriate way to achieve the purpose of the Resource Management Act.

230. For the purpose of the section 32 evaluation, an 'objective' can be either the actual objectives proposed in the change, or where there are not objectives, the purpose of the change. The changes for natural character and regionally significant infrastructure do not change objectives but their purpose is outlined here and appropriateness of that change assessed.

231. The appropriateness has been assessed with reference to the following criteria[80]:

- Relevance: Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?
- Usefulness: Will the objective guide decision-making? Does it meet sound principles for writing objectives (does it clearly state the anticipated outcome)?
- Reasonableness: What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified mana whenua / tangata whenua and community outcomes?
- Achievability: Can the objective be achieved with tools and resources available, or likely to be available, to the Council or those implementing the RPS?

232. The appropriateness evaluation does not need to consider alternative options. However current objectives in the RPS (the status quo) are considered in evaluating the appropriateness of the proposed Change 1. In some cases, alternative options for objectives were a key consideration and this is included in the evaluation tables. But generally, given Change 1 is responding to the national direction, the options at an objective level were limited.

233. The evaluation of each of the topics is provided in the tables below. The topics are considered in the order that the provisions appear in the RPS. This evaluation of proposed changes should be read alongside the changes themselves, which are outlined in the RPS Change 1 document.

234. In this evaluation, reference to mana whenua / tangata whenua refers to all mana whenua / tangata whenua acknowledging that some partners of the Council have different preferences.

Assessment of efficiency and effectiveness of provisions

235. Section 32(1)(b) requires an evaluation of whether the proposed provisions (policies and methods) are the most appropriate way of achieving the objectives by:

- Identifying other reasonably practicable options for achieving the objectives
- Assessing the efficiency and effectiveness of the provisions in achieving the objectives
- Summarising the reasons for deciding on the provisions.

236. At least one alternative option is identified in all topic evaluations. The status quo, current RPS, is an option. However, in some cases the current RPS does not implement the NPS as required and is therefore not an option appropriate to evaluation in full.

237. Section 32(2) of the RMA requires that in assessing the efficiency and effectiveness of the provisions, the assessment must:

- Identify and assess the benefits and costs of the environmental, economic, social, and cultural effects anticipated by the implementation of the provisions, including effects on opportunities for economic growth and employment
- Where practicable, quantify the benefits and costs of a proposal
- Assess the risk of acting or not acting if there is uncertain or insufficient information.

238. In implementing national direction, and considering the proposed changes at a regional and local scale, it can be very challenging to look at implications, costs and benefits at both that panoramic and local viewpoint. Implications differ between areas and communities and assessing how a shift in policy may play out for communities is an extremely complex task – in many locations the impacts will be minimal but there will also be cases of extremes (e.g. high impact).

[80] These criteria are adapted from the MfE guide to section 32 (A guide to section 32 of the Resource Management Act | Ministry for the Environment) and practice developed in undertaking section 32 evaluations.

239. While assessing the costs can be challenging, measuring benefits can be even more challenging. This is partly because costs tend to be shorter term and foreseeable, and benefits further down the track and more uncertain how they will play out. Benefits generally fall into two categories: gains in outcomes, and losses that are avoided. Avoided costs are particularly relevant for environmental regulation, for example a benefit of policy change could avoid costs required in the future to remediate an area of deteriorating water quality or to respond to damages from climate change events. The potential for avoided costs in the freshwater reforms have been noted by the Ministry for the Environment:

> *There will be costs of action but the costs of inaction are not zero. The freshwater issues currently facing New Zealand have significant costs (e.g. the costs of on-going funding to remediate degraded waterways). In addition to improving our environment, one of the major benefits of the Essential Freshwater package is the avoidance of even greater future costs – generally environmental interventions are cheaper and more cost-effective the sooner they are implemented.*[81]

240. The costs of inaction are particularly relevant for climate change mitigation and there is extensive literature and studies that have highlighted the significant costs of inaction in relation to climate change[82]. Central government has recognised the importance of assessing the climate change impacts of policy proposals when undertaking cost-benefit analysis (CBA) though Treasury's CBAx Tool User Guidance[83]. This provides a guide to assess the costs and benefits of emissions (i.e., policies that avoid emissions) using 'shadow emission values' which are based on estimates of costs of future emission reductions (abatement) to meet New Zealand's domestic emission reduction targets. It represents the traded cost of carbon which Treasury estimates to rise from $25/tonne in 2019 to as high as $343/tonne in 2050.

241. The Treasury CBAx guidance emphasises that the shadow emission values have been developed for use in central government CBAx. While local government may wish to align their shadow emission cost analysis with these values and New Zealand's domestic transition pathway, the Treasury shadow emission values may not represent the specific abatement costs faced by non-central government entities. The applicability of Treasury's shadow emission prices to Greater Wellington's internal carbon values has been considered as outlined in a technical internal memo[84]. Greater Wellington now uses the central estimate of shadow emission values from the Treasury for estimates of the cost of offsetting as part of its broader Carbon Reduction Policy.

242. This Section 32 provides an indicative, quantitative assessment of the costs and benefits of the climate change targets in Change 1 through two ways. The first is using the Treasury shadow emission values as outlined above. The second is to use the 'global social cost of carbon' (GSCC). The GSCC is intended to represent, in dollar values, the total damage done to the world by an extra tonne of carbon dioxide being released into the atmosphere and remaining there. It can be thought of as the 'cost of inaction'. GSCC values vary greatly, depending on the assumptions made and uncertainties and limitations inherent in modelling future climate damages[85]. Greater Wellington's

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[81] Interim Regulatory Impact Analysis for Consultation: Essential Freshwater (page 6)

[82] The most well-know of these is the 2006 Stern Review of the Economics of Climate Change. It found that without action, the overall costs of climate change will be equivalent to losing at least 5% of global gross domestic product (GDP) each year whereas stabilising the concentration of greenhouse gases between 500 and 550 parts per million of CO2e (almost twice the preindustrial average) would cost 2% of global GDP. Refer: The Economics of Climate Change: The Stern Review: https://www.webcitation.org/5nCeyEYJr?url=http://www.hm-treasury.gov.uk/sternreview_index.htm

[83] Treasury (2021), 'CBAx Tool User Guidance Guide for departments and agencies using Treasury's CBAx tool for cost benefit analysis', Appendix 5, refer: CBAx Tool User Guidance - September 2021 (treasury.govt.nz)

[84] Memo to Climate Emergency Programme Board, Review of GW's internal cost carbon values, 7 October 2021.

1. [85] Refer for example: Journal of Cleaner Production, 2019, 'Estimates of the social cost of carbon: A review based on meta-analysis' refer: 'https://doi.org/10.1016%2Fj.jclepro.2018.11.058

approach to set a value for GSCC as part of its Carbon Reduction Policy is set out in an internal technical memo[86].

243. Efficiency is an everyday term, but its meaning is quite complex, particularly in assessing the efficiency of RMA plan provisions. Efficiency is about how well resources are allocated and can be made up of different types of efficiency including technical (inputs/outputs), productive (use of resources in production), allocative (distribution of resources) and dynamic (changes relating to growth or future state) efficiency. They are all important and the aspects are considered in this assessment as relevant for that proposed provision.

244. The RMA defines costs and benefits to include those that are both monetary and non-monetary[87]. In this assessment, the following approach has been adopted to the terms cost and benefit[88]:

- Cost: A cost, or negative effect, where society has to sacrifice something to obtain a desired benefit.
- Benefit: A benefit, or positive effect, that enhances well-being within the context of the RMA.

245. The assessment is focused on marginal costs and benefits, being the additional costs and benefits to a community compared to the status quo or compared to what would be expected from national policy/direction. The degree of costs and benefits can depend on the local context including level of deprivation in the local community and ability to withstand changes in costs. Where this local context is relevant, it has been considered in assessing the costs and benefits.

246. Costs and benefits have spatial distributions so they will vary in different locations. The regional context described in the previous section is relevant in considering locations of impacts, for example where different land uses are affected. Costs and benefits also have temporal distribution and can change over time. They are affected by changes that would occur anyway, separate to the changes as an immediate result of RPS changes. For example, it is assumed that there is technological improvement and changes in practice over time so that where proposed policies may encourage a change of land use, intensification, or protection of fresh water, a degree of this would have occurred over time anyway so the cost of the RPS change may be focused on the cost/benefit of making that change occur slightly more quickly or avoided costs by not delaying that change too far into the future.

247. Environmental, economic, cultural and social effects categories are not necessarily separate and distinct, and often have complex relationships that overlap, for example there is a cultural perspective across the other domains of effects. Further, environmental effects can often eventually result in economic effects. The four effects domains relate to who is affected. Effects may have environmental, economic, social and cultural dimensions in their likelihood, scope, scale, location, timing, and their positive or adverse significance. Effects may also be direct or indirect.

248. In this assessment, the following approach has been adopted in distinguishing the four effects domains[89], noting that an overview of all domains is also evaluated to provide a focus on the *outcomes* anticipated from Change 1 or alternative options assessed:

- Environmental: effects to natural resources, natural sites or areas, natural conditions
- Economic: effects to a community, land-owner, business or authority including economic growth, administrative costs, employment, development potential, compliance costs, production costs

[86] Memo to Climate Emergency Programme Board, Review of GW's internal cost carbon values, 7 October 2021.
[87] It is generally not appropriate to monetise the non-market impacts
[88] Meaning of these terms taken from MfE Guide to Section 32, page 18.
[89] Approach to effects domains taken from MfE Guide to Section 32, page 58

- Cultural: cultural effects on Māori which incorporates aspects of economic well-being of iwi/Māori and opportunities for business development, spiritual values towards the environment, places and areas of significance to Māori, natural resources of value to Māori, changes to Māori communities
- Social: effects on communities and society including places or sites valued by a community, social cohesion.

249. Economic growth is the net increase in the size of the economy where the economy is made up of natural, built, human and financial capital. It is measured by activity where both quality and quantity of activity is relevant to economic wellbeing. A broad perspective on 'economy' is essential as a 'solution' or change in how we respond to an issue, will likely need to be a different type of response to the one that created the issue, in order to effect change. Employment opportunities are the potential for job or work opportunities to be generated by the change. An increase in economic output and employment is not automatically a benefit and economic activity can include both benefits and costs. Economic resilience is a relevant component of a strong economy and an aspect in assessing economic effects.

250. The risk of acting or not acting can be an assessment of the differences between acting now or later. While there may be a greater level of information or certainty in leaving changes to later, this is not always guaranteed in many policy topics with ongoing levels of uncertainty.

251. Uncertainty is the situation involving imperfect and/or unknown information. It applies to physical measurements that are already made, to predictions of future events, and to the unknown. We are all, in our daily lives, frequently presented with situations where a decision must be made when we are uncertain of exactly how to proceed. Risk is the consequence of the uncertainty combined with the associated likelihood of occurrence. In an RMA sense, this could relate to uncertainty in information about natural resources, with a risk of failure to achieve outcomes (for example fresh water objectives).[90] Uncertainty and risk are closely linked in this Section 32 assessment, and where there is identified risk or uncertainty, this is described in the evaluation tables below.

252. Where is a low level of risk and uncertainty, and the proposal is a minor change, then the level of assessment is relative to the scale and significance of the change, as outlined in the introduction to this evaluation section of the section 32 report (section 7).

253. As a number of the proposed changes in Change 1 are responding to national direction, much of the evaluation of the provisions is provided as a qualitative assessment. Benefits and costs have been assessed separately by government in development the NPS through the Section 32 reports for those NPS, and the regulatory impact statements for the related process of government confirming the regulation[91]. This also applies to draft NPS (NPS-IB) and other national policy, for example climate change legislation has been through a regulatory impact process.[92]

254. More detailed assessment of the provisions is provided where Change 1 goes further than the national direction and the existing RPS.

255. Implementation of the changes to the RPS do not always have a direct impact that can be described in terms of costs and benefits now. This is because many impacts of the policy changes will largely be determined and managed through subsidiary documents, including the Natural Resources

[90] MfE - A Guide to Communicating and Managing Uncertainty, page 6 – 7
[91] Each NPS has a section 32 reports and Regulatory impact statement. For NPS-UD and NPS-FM - National policy statements | Ministry for the Environment. For NPs-IB - Draft National Policy Statement for Indigenous Biodiversity | Ministry for the Environment. Climate change legislation - Regulatory impact statement Zero Carbon Bill | Ministry for the Environment
[92] Ministry for the Environment (2019), 'Regulatory Impact Statement Linking the Zero Carbon Act 2019 and the Resource Management Act 1991', refer: Regulatory Impact Assessment - Impact Summary Template (environment.govt.nz)

Regional Plan and District Plans. The costs and benefits of the rules and other methods implemented through these RMA plans will be assessed at the time they are developed.

256. Costs and benefits compared to the status quo or national direction, are described and categorised to assist the reader understand the likely magnitude of costs and benefits as:

- Nil – no costs/benefits anticipated
- Low – some noticeable costs/benefits are anticipated but these would be minimal
- Medium – moderate costs/benefits
- High – more significant costs/benefits.

257. There have been constraints in doing this efficiency and effectiveness evaluation for the RPS changes. Notably, the timeframe available given the deadline in the NPS-UD, has limited the extent of both qualitative and quantitative analysis completed. Evaluation will be ongoing as the Change 1 process continues.

258. A summary of the assessment of identifiable costs and benefits associated with the proposed policies is provided in the following tables. For this evaluation section of the section 32 report, the topics are worked through in the order that the provisions appear in the RPS. This evaluation of proposed changes should be read alongside the changes themselves outlined in a separate document.

259. The tables assess these groupings of provisions and order as per the RPS:

- Policies for integrated management
- Policies for climate change
- Policies for natural character in the coastal environment
- Policies for Te Mana o te Wai
- Policies for indigenous ecosystems
- Policies for urban development
- Provisions for regionally significant infrastructure.

7.0 SUMMARY OF PREFERRED OPTION

Summary – preferred option

260. A new objective is included for integrated and respectful environmental stewardship that embraces Te Ao Māori and prioritises the health of the natural environment. Amendments are proposed across the Change 1 topics with integrated management in mind, including considering effects of climate change when setting freshwater limits; and ensuring integrated land management for both land/freshwater outcomes.

261. New objectives, policies and methods would contribute to achieving well-functioning urban environments, including through giving regulatory weight to the Wellington Regional Growth Framework and putting the relevant requirements of the NPS-UD into the RPS. The current RPS does not give effect to the NPS-UD. There is more work to be done to supplement a future spatial approach informed by a Future Development Strategy (FDS) yet to be prepared, fully incorporating the recent government initiatives for intensification. Proposed changes include provisions:

- Ensuring sufficient development capacity and enabling intensification
- Maintaining and enhancing the quality of the natural environment
- Enabling Māori to express cultures and traditions within urban development
- Public transport oriented, compact urban design
- Green infrastructure/low impact urban design for new urban development
- Encouraging water sensitive urban design.

262. New and amended objectives (including freshwater visions and objectives for Rangitāne o Wairarapa and Kahungunu ki Wairarapa) and new and amended freshwater policies are required as the existing RPS does not give effect to the NPS-FM 2020. The proposed objectives and policies are preferred based on recommendations of the Whaitua Implementation Programmes, and working with mana whenua / tangata whenua on the specific response in the RPS in relation to the NPS-FM.

263. While the NPS-FM does not require amendments to RPS and plans until 2024, putting forward this change to the RPS now is preferred to provide guidance to the regional council and territorial authorities in district and regional plan reviews and implementation. The status quo is not an appropriate option to give effect to the NPS-FM. Work with mana whenua / tangata whenua is ongoing and further changes to implement Te Mana o te Wai into the RPS will occur in 2023-24.

264. Change 1 provides the opportunity to align the RPS with Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020. The changes are part of implementing and integrating the NPS-FM, NPS-UD, and whaitua recommendations. The preferred option will also contribute to the Council's climate change goals, and pre-emptively align with the policy direction and implementation requirements in the NPS-IB exposure draft expected to come into effect in late 2022. Overall, the proposal is to expand and strengthen the current approach in the RPS by amending existing provisions and inserting new objectives, policies and methods including:

- Setting a deadline of 2024 for district plans to identify and protect significant natural areas
- Driving improved outcomes when managing effects of development including through offsetting / compensation
- Provide for mana whenua / tangata whenua values and role as kaitiaki
- Establish targets and priorities for restoration, using a collaborative process
- Promoting the protection, restoration and enhancement, of ecosystems that provide multiple benefits.

265. A new Climate Change Chapter is proposed to be inserted into the RPS. The new provisions will provide strong direction by setting greenhouse gas emission reduction targets for the Wellington Region aligned with "the Paris Agreement", the legally binding international treaty on climate change to which New Zealand is a signatory, and setting a clear framework to make meaningful progress in mitigating and adapting to climate change. The new chapter aligns with national policy direction and incorporates Objectives, Policies and Methods on:

- Ensuring a low-emission and climate-resilient region
- Reducing emissions from transport (including new transport infrastructure), agriculture, energy, waste and industry
- Providing for nature-based solutions to climate change
- Identifying priority ecosystems across the region that make a significant contribution to climate change mitigation and/or adaptation and promoting their protection.
- Ensuring resilience to climate change through adaptation in land and water use planning
- Acknowledging mana whenua / tangata whenua strategic role in climate change action
- Supporting business and communities to act.

Relevant existing provisions amended

266. This Change will add, amend, delete or replace existing provisions in the following parts of the RPS:

- Section 3 issues, objectives and summary of policies and methods to achieve the objectives in the RPS:
    - New overarching issues and objective for integrated management
    - New Section 3.1A – Climate change
    - Section 3.3 – Energy, infrastructure and waste
    - Section 3.4 – Fresh water (including public access)
    - Section 3.6 – Indigenous ecosystems
    - Section 3.8 – Natural hazards
    - Section 3.9 – Regional form, design and function
- Section 4.1 Regulatory policies – direction to district and regional plans and the Regional Land Transport Plan
    - Amendments to Policy 2, 3, 7, 9, 10, 11, 12, 13, 14, 15, 17, 18, 23, 24, 29, 30, 31, 32, 33,
    - New policies inserted for energy, infrastructure and waste, fresh water, indigenous ecosystems, urban development, and climate change
- Section 4.2 Regulatory policies – matters to be considered
    - Amendments to Policy 39, 40, 41, 42, 43, 44, 45, 47, 51, 52, 55, 56, 57, 58
    - New policies inserted for fresh water, indigenous ecosystems, urban development, climate change, integrated management
- Section 4.3 Allocation of responsibilities
    - Amendments to Policy 61
    - New policy inserted for fresh water
- Section 4.4 Non-regulatory policies
    - Amendments to Policy 65, 67
    - New policy inserted for fresh water, indigenous ecosystems, climate change
- Section 4.5 Methods to implement policies amended

  Appendix 1A inserted, Limits to biodiversity offsetting

  Appendix 3 Definitions amended

8.0 EVALUATION OF APPROPRIATENESS OF OBJECTIVES / PURPOSE OF CHANGE

Integrated management evaluation – appropriateness of objectives

Objective A: Integrated Management		
New Objective A focuses on the greater integration of natural resources management and decision making, that recognises Te Ao Māori as part of the holistic and inclusive natural resource management system. **Objective A**: Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (a) incorporates mātauranga Māori; and (b) recognises ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and (c) protects and enhances mana whenua/tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and (d) recognises the dependence of humans on a healthy natural environment; and (e) recognises the role of both natural and physical resources in providing for the characteristics and qualities of well-functioning urban environments; and (f) responds effectively to the current and future pressures of climate change, population growth and development.		
Intent of change:		
The intent of this new objective is to provide greater clarity and direction to the Regional Council and Territorial Authorities about what is meant by integrated management of natural resources, as well as recognising importance of Te Ao Māori and Mātauranga Māori in natural resources management and decision making. The objective is aligned to NRP provisions including Policy P1: Ki uta ki tai and integrated catchment management in the RPS, as well as reflecting requirements of NPS-FM. The objective recognises the importance of an integrated management approach in responding to the pressure on the built environment from increased population in terms of development capacity and housing .		
Other objective options:		
Status quo: No integrated management objective. In the operative RPS under the 'Setting the Scene' there is a dedicated section 'Integrating management of natural and physical resources'. This section does not contain any objectives or policies. The existing RPS Policy 64 is non-regulatory, alongside Method 29 which only promotes integrated management.		
Other relevant objectives both proposed and operative:		
N/A		
	Preferred option – new Objective	Status quo
Relevance:		

Addresses the relevant resource management issue?	Objective A provides for a clear description of what the success of achieving integrated management of natural and physical resources looks like. It provides for the policies that focus on the key principles of integrated management and uniquely to Aotearoa recognises importance of Te Ao Māori in natural resources management and decision making.	There is no current objective and the RPS does not adequately address integrated management.
Gives effect to national direction?	The preferred option gives effect to central government direction, in particular to the NPS-FM, but is also integral in implementing the NPS-UD.	It does not give effect to national direction.
Usefulness:		
Will provide clear direction to decision makers and territorial authorities?	Objective A gives clear direction and more certainty to both regional and district councils about the desired outcome of successful integrated management and what this should look like.	The existing RPS does not provide any direction. It has not led to the effective integrated management across natural resource management.
Will it impose an unreasonable cost and disruption to the community?	No, it will not impose unreasonable costs and disruption. Some costs may arise for additional resourcing in implementation, at least initially. However, more connected and joined up management and decision making will identify issues early and should ultimately reduce issues, resulting in better outcomes for the environment and people.	The status quo provisions would not impose unreasonable costs or disruption. However, given the nature of the status quo provisions, the costs and disruption to the community are less defined and more unclear than the preferred option.
Can direction be reasonably implemented?	Providing clear direction will enable more efficient implementation, as well as give effect to the central government direction.	Given the status quo provisions are generic and do not clearly give effect to national direction, they cannot be reasonably implemented.
Achievability:		
Can be achieved with tools and resources available, or likely to be available, to Greater Wellington Regional Council or those implementing the RPS?	The preferred option can be implemented, and the objective worked towards using Greater Wellington Regional Council tools and resources, in collaboration with mana whenua / tangata whenua, territorial authorities and the community. The NRP policies support implementation.	The status quo option is achievable using Greater Wellington Regional Council tools and resources.

Climate change evaluation – appropriateness of objectives

Climate change
New Objectives CC.1-CC.6: Climate Change Mitigation and Adaptation Objective CC.1 By 2050, the Wellington Region is a low-emission and climate-resilient region, where *climate change mitigation* and *adaptation* are an integral part of: (a) sustainable air, land, freshwater and coastal management, (b) well-functioning urban environments and *rural areas*, and (c) well-planned infrastructure. Objective CC.2 The costs and benefits of transitioning to a low-emission and climate-resilient region are shared fairly to achieve social, cultural, and economic well-being across our communities. Objective CC.3 To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced: (a) By 2030, to contribute to a 50% reduction in greenhouse gas emissions from 2019 levels, including a: (a) 35% reduction from 2018 levels in land transport-generated greenhouse gas emissions, (b) 40% increase in active travel and public transport mode share from 2018 levels, and (c) 60% reduction in public transport emissions, from 2018 levels, and (b) By 2050, to achieve net-zero *emissions*. Objective CC.4 *Nature-based solutions* are an integral part of *climate change mitigation* and *adaptation*, improving the health and resilience of people, biodiversity, and the natural environment.

Objective CC.5

By 2030, there is an increase in the area of *permanent forest* in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well-being.

Objective CC.6

Resource management and adaptation planning increase the resilience of communities and the natural environment to the short, medium, and long-term effects of climate change.

Objective CC.7

People and businesses understand what climate change means for their future and are actively involved in planning and implementing appropriate *mitigation* and *adaptation* responses.

Objective CC.8

Iwi and hapū are empowered to make decisions to achieve climate-resilience in their communities.

Intent of change:

As outlined in Section 3.0 of this report, Resource Management Issues, there is international, national and regional direction for proactive and courageous climate action. The Climate Change Commission recognises that all levels of central and local government must come to the table with strong climate plans to get us on the right track, concluding that bold climate action is possible when we work together. [93] The important role of local government in reducing emissions is further articulated in the Emission Reduction Plan as follows:

> *Local government is fundamental to meeting our 2050 targets, mitigating the impacts of climate change and helping communities to adapt to climate change.*
>
> *Local government makes decisions in many sectors that will need to transition. Councils provide local infrastructure and public services…They also have planning and decision-making powers in relation to land use and urban form.*
>
> *Many councils are already working on initiatives to address the impacts of climate change and support an equitable transition. Councils play an important role in engaging with their communities to help with the significant behavioural shifts required to meet our climate goals…*
>
> *…Central and local government will work in partnership, alongside Māori, to align policies and deliver actions to meet our 2050 targets*[94].

[93] New Zealand Climate Change Commission, 2021: *Ināia tonu nei: a low emissions future for Aotearoa*

[94] Ministry for the Environment (2022), 'Towards a productive, sustainable and inclusive economy', pg 34. Refer: Aotearoa New Zealand's first emissions reduction plan (environment.govt.nz)

The RPS change will also support the implementation of the 2019 Greater Wellington Regional Council declaration of a climate emergency. The Council has pledged to become carbon neutral by 2030 and take a leadership role in developing a Regional Climate Emergency Response Programme. This involves working collaboratively with iwi, key institutions and agencies to reduce greenhouse gas emissions and prepare for the unavoidable effects of climate change, supporting international and central government targets for emissions reductions and adaptation planning.

The proposed objectives are intended to ensure that the RPS helps to support achievement of the Paris Agreement, the national emission reduction targets in the CCRAA, and the broad range of actions outlined in the first Emissions Reduction Plan. The Emissions Reduction Plan recognises the important role of the resource management/planning system to complement emission pricing and other policy initiatives and includes a number of key actions to be delivered, directly or indirectly, through the resource management/planning system in relation to transport, urban planning, energy and industry, and forestry.

While the operative RPS includes some provisions that respond to climate change, apart from some natural hazard provisions, these are generally weak, in terms of being promotional rather than directive, and are not integrated across the RPS. The intent of these proposed changes is to update the RPS to identify climate change as a significant resource management issue for the region, recognising that almost all local government roles and responsibilities are in some way affected by climate change and/or can influence the achievement of desired climate change outcomes[95]. Amendments will establish strategic regional priority actions and a statutory framework that drives the integrated management of natural and physical resources to support the mitigation of, and adaptation to, climate change. Establishing climate change as a central pillar of the RPS recognises that it is inextricably connected to a broad range of key resource management issues, including biodiversity loss, the degradation of aquatic and terrestrial ecosystems, and the development of well-functioning urban environments.

The proposed objectives are intended to recognise that avoiding the very worst impacts of climate change by limiting warming to 1.5°C may still be possible, but will require rapid, strong and sustained reductions in GHG emissions through significant transitions in the way that we use and develop our land, water, energy, industry, buildings, transport, and cities. Inaction now will simply result in steeper reductions in the future at a greater overall cost to society. The proposed objectives also recognise that changes to increase resilience and adaptation to climate change are critical to address the impacts of climate change that are now unavoidable. The suite of proposed objectives focuses on those transitions able to be influenced by local government roles and responsibilities under the RMA.

Climate change is an incredibly complex problem[96] and requires multiple, often inter-connected, solutions[97]. It also requires actions and decisions when there is uncertainty in the problem, effects, and consequences of action to avoid most costly responses (mitigation and adaptation) in the future. Many

[95] Local Government New Zealand, June 2017: How climate change affects local government: a catalogue of roles and responsibilities. https://www.lgnz.co.nz/assets/Uploads/f86bfef615/44476-LGNZ-How-climate-change-affects-local-government2.pdf

[96] Sometimes referred to as a "wicked problem" where there is considerable uncertainty in knowledge, values and consequences

[97] He Pou a Rangi - Climate Change Commission (2021), 'Ināia tonu nei: a low emissions future for Aotearoa'.

climate solutions can provide multiple benefits, for example sequestering carbon while also enhancing indigenous biodiversity and water quality, giving effect to both Te Mana o te Wai (NPS-FM) and Te Rito o te Harakeke (exposure draft NPS-IB), foundational principles in the NPS-FM and exposure draft NPS-IB. The proposed objectives introduce a new management framework for regional climate change mitigation and adaptation, integrating with other objectives, for example, for energy and waste, natural hazards, fresh water, and indigenous ecosystems.

The new objectives framework seeks to drive a step-change in resource management to transition the Wellington Region into a low-emission and climate resilient region. The framework draws upon and responds to the Climate Change Response (Zero Carbon) Amendment Act 2019, the latest science from the IPCC, the latest advice from the NZ Climate Change Commission, the National Emissions Reduction Plan and the National Adaptation Plan.

Other objective options:

Status quo: The RPS includes one objective (Objective 9) to reduce greenhouse gas emissions from transportation and one objective (Objective 21) that aims for communities to become more resilient to natural hazards, including the impacts of climate change, and people to be better prepared for the consequences of natural hazard events. The status quo also includes objectives to implement the NPS-UD, to improve fresh water in accordance with the NPS-FM, and to maintain, enhance and restore indigenous biodiversity in alignment with the ANZBS and exposure draft NPS-IB. These objectives are not directive, strategic nor specific enough to drive the necessary actions to secure climate change mitigation and adaptation in the Wellington Region and implement or align with relevant climate change national direction, legislation and policy initiatives/actions.

Both the National Adaptation Plan and the National Emissions Reduction Plan expressly state that climate adaptation and mitigation have been delayed for far too long. IPCC recognises that climate change is the result of more than a century of unsustainable energy and land use, lifestyle and patters of consumption and production[98]. Without a significant change to the status quo, our communities, particularly future generations, face significant risks to the quality of their lives and their livelihoods, along with a significant decline in ecosystem health and biodiversity.

Other relevant objectives both proposed and operative:

Objective A:	Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (a) incorporates mātauranga Māori; and (b) recognises ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and (c) protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and (d) recognises the dependence of humans on a healthy natural environment; and

[98] https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_SPM.pdf

	(e) recognises the role of both natural and physical resources in providing for the characteristics and qualities of well-functioning urban environments; and (f) responds effectively to the current and future pressures of climate change, population growth and development.
Objective 9	The region's energy needs are met in ways that: (a) improve energy efficiency and conservation; (b) diversify the type and scale of renewable energy development; (c) maximise the use of renewable energy resources; (d) reduce dependency on fossil fuels; and (e) reduce greenhouse gas emissions from transportation
Objective 11	The quantity of waste disposed of is reduced.
Objective 16	Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are ~~maintained~~ *protected*, enhanced, and restored to a healthy functioning state.
Objective 16A	The region's indigenous ecosystems are *maintained*, enhanced, and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to *Te Rito o te Harakeke*.
Objective 19	The risks and consequences to people, communities, ~~their~~ business~~es~~, property, ~~and~~ infrastructure and the environment from natural hazards and the effects of climate change ~~effects~~ are ~~reduced~~ *minimised*.
Objective 20	Natural hazard and *climate change mitigation and adaptation* activities minimise the risks from natural hazards and impacts on *Te Mana o te Wai*, *Te Rito o te Harakeke*, natural processes, indigenous ecosystems and biodiversity. ~~Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events.~~
Objective 21	The resilience of our ~~C~~communities ~~are more resilient to natural hazards, including the impacts~~ and the natural environment to the short, medium, and long-term effects of climate change~~,~~ and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.
Objective 22	Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning *urban environments*, which: (a) Are compact and well designed; and

	(b) Provide for sufficient development capacity to meet the needs of current and future generations; and (c) Improve the overall health, well-being and quality of life of the people of the region; and (d) Prioritise the protection and enhancement of the quality and quantity of freshwater; and (e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and (f) Support the transition to a low-emission and climate-resilient region; and (g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and (h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and (i) Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and (j) Provide for commercial and industrial development in appropriate locations, including employment close to where people live; and (k) Are well connected through multi-modal (private vehicles, public transport, walking, micro-mobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space. ~~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;~~ ~~(k) efficiently use existing infrastructure (including transport network infrastructure); and~~ ~~(l) essential social services to meet the region's needs.~~	
Objective 30	Soils maintain those desirable physical, chemical and biological characteristics that enable them to retain their ecosystem function and range of uses.	
	Preferred option – The suite of six new objectives	Status quo – Retain existing objectives plus changes required to implement NPS-UD
Relevance:		
Addresses the relevant resource management issue?	The new climate change objectives, supported by new objectives in the integrated management, urban development, fresh water, indigenous ecosystems, and natural hazards chapters, address the six new climate change issues defined. The six objectives establish a targeted and integrated objectives framework that will drive the integrated management of the region's natural and physical resources to support the mitigation of, and adaptation to, climate change. The framework provides a clear set of outcomes relating to the three key strategic climate change responses: reducing emissions, increasing sinks (through nature-based solutions), and developing adaptation and resilience for people and the natural environment. The proposed framework aligns with the climate change related objectives in the Wellington Regional Growth Framework to: • Enable growth that protects and enhances the quality of the natural environment and accounts for a transition to a low/no carbon future. • Build climate change resilience and avoid increasing the impacts and risks from natural hazards.	Existing objectives provide some support for climate solutions. For example, objectives that aim to protect and/or restore natural ecosystems and ecological processes will provide co-benefits for climate change mitigation and adaptation, Objectives 19 and 21 aim to reduce risk and increase resilience, but focus narrowly on natural hazards, rather than developing resilience to the full suite of climate change effects on people and nature. Reducing greenhouse gas emissions is considered partially, but generically, in Objective 9; in relation to energy and transport – seeking to reduce the region's dependency on fossil fuels and reduce greenhouse gas emissions from transport. However, this objective has not proven to be specific or directive enough to address the resource management issues by the quantum of change required. The limited scope and direction in Objective 9 is insufficient to give effect to, and align with, more recent national direction, legislation and policy that the planning system requires to play a key role in reducing emissions across multiple sectors (as outlined in the Emission Reduction Plan).

	The Climate Change Commission and central government (though the Emissions Reduction Plan) are both clear that local government and the planning system have important roles to play in climate change mitigation, to complement the NZ Emissions Trading Scheme and national policy initiatives, particularly for sectors unaffected by, or less responsive to, emissions pricing. Objective CC.1 recognises that rapid and large-scale changes are required to the way in which we manage our natural and built environments to transform the Wellington Region into a low-emission and climate-resilient region. Objective CC.2 responds to the issue that the impacts of climate change will not be felt equitably across our communities. Some communities have no, or only limited, resources to enable mitigation and adaptation and will therefore bear a greater burden than others, with future generations bearing the full impact Objective CC.3 aligns with the goal of the Paris Agreement to limit global warming to well below 2, preferably 1.5 ^{o}C, compared to pre-industrial levels. This is the threshold to avoid catastrophic impacts on the natural environment, the health and well-being of our communities, and our economy. To keep global warming to no more than 1.5^{o}C, emissions need to be reduced to net zero by 2050. Objective CC.3 also includes a 2030 target to reduce absolute greenhouse gas emissions by 50% from 2019 levels as we work towards net zero emissions by 2050. This is within the range (34-60% reduction from 2019 levels) calculated by the Intergovernmental Panel on Climate Change as being required to give a 50% chance of staying below 1.5^{o}C with no or limited	The NPS-UD (implementation of which is part of the status quo) includes objectives and policies that support reductions in emissions. However, the requirements of the existing RPS and the NPS-UD are of a generic nature and not specific, and do not address the need to mitigate the effects of climate change through RPS direction. The status quo objectives do not address the full range of greenhouse gas emission sources, set targets, timeframes, or identify priorities for action.

	overshoot[99]. The objective also incorporates the 2030 targets set in the Regional Land Transport Plan to reduce greenhouse gas emissions from transport, giving these targets statutory weight in resource management decision making. Objective CC.3 is framed in a way to make it clear that the RPS can only contribute to achieving these emission reduction targets, recognising that local government holds only some of the levers required to drive emissions reductions. This is discussed more in section 5 above in relation to the Climate Change (Zero Carbon) Amendment Act and the broad range of actions recognised in the National Emissions Reduction Plan as contributing to meeting emission reduction targets and budgets. Options for setting these targets are considered in the technical memo "Options for setting regional greenhouse gas reduction targets" July 2022[100]. The main alternatives are to: a) Adopt the targets set in the Climate Change Response (Zero Carbon) Amendment Act and government's emissions budget and targets. The Act takes a split gas approach, requiring long-lived gases to be brought to net zero by 2050, with biogenic methane to be reduced by 10% from 2019 levels by 2030 and by between 24% and 47% by 2050. Adopting these targets would be the simplest approach to defend as they are aligned to the national level of ambition. As the Paris Agreement is written on the basis of all gases being brought to net zero, the approach in the CCRAA essentially means that residual biogenic methane emissions must be compensated for by CO_2 removals from the	

[99] https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_SPM.pdf
[100] Internal Greater Wellington Technical Memo prepared by Jake Ross, July 2022

	atmosphere in order to meet New Zealand's international commitments. While NZ's targets for long-lived gases may well be 1.5℃-consistent or close to it, when coupled with the dead weight of our residual biogenic emissions, the combined national target is much weaker. From a global, 'all-gases' perspective, the emission reduction targets are not a sufficient contribution to limiting global heating to 1.5℃. b) To not include a reduction target and refer only to contributing to the national and global efforts to limit warming to 1.5℃. While this option has benefits in terms of being flexible, the lack of direction and specificity on the amount of emission reductions needed in the region creates risk of continued inaction and/or ineffective policy responses. This option does not adequately recognise the urgency to respond to the climate change or the scale of emissions reductions needed. The target adopted in Objective CC.3 is considered to be an appropriate and effective target for the Wellington Region that is ambitious and science-based. The proposed target requires a smaller emissions reduction than a fully "fair share" target (one that recognises the higher level of historic emissions and benefits that developed countries, such as New Zealand, have gained by using fossil fuels), but a higher and faster emissions reduction pathway than the national emissions budget. It aligns at a global level with what is required to limit global warming to the bounds set by the Paris Agreement and sets a level of aspiration or a "call to action" relevant to the Wellington Region that the RPS, and consequential regional and district plans, can work towards achieving through to 2050.	

	Objective CC.4 recognises that climate change and the decline of ecosystem health and biodiversity are intertwined. Nature-based solutions provide a critical opportunity to both mitigate and adapt to climate change, with co-benefits for the health of people and the natural world. Protecting and restoring the health of natural ecosystems is critical to ensure that they are resilient, can persist into the future and continue to provide the range of ecosystem services that support our lives and livelihoods. These ecosystem services include carbon sequestration and storage, natural hazard mitigation, and the provision of food and amenity, while also working to reverse the national decline in indigenous biodiversity. Objective CC.5 recognises the need to increase the area of permanent forest in the region to provide carbon sequestration to contribute to achieving net zero greenhouse gas emissions by 2050, while recognising the risk that large-scale, potentially unmanaged (primarily exotic) forestry poses to the social and economic well-being of rural communities[101].The objective therefore seeks to maximise the benefits for indigenous biodiversity, land stability, water quality, and social and economic well-being. The objectives framework also recognises that, as emphasised by the Climate Change Commission, while fast-growing exotic species have a role to play, they cannot be used in place of reducing emissions.[102] Carbon sequestration from reforestation is greatest as the forest grow, and before they reach maturity. The Emissions Reduction Plan identifies a *"significant opportunity to develop native forests that both act as long-term carbon sinks and support biodiversity … forests continue to play*	

[101] These concerns were recently tested by the Government through consultation on changes to the NZ ETS relating to permanent exotic forestry: Managing exotic afforestation incentives (mpi.govt.nz)

[102] https://ccc-production-media.s3.ap-southeast-2.amazonaws.com/public/Inaia-tonu-nei-a-low-emissions-future-for-Aotearoa/Inaia-tonu-nei-a-low-emissions-future-for-Aotearoa.pdf

	a critical role as carbon sinks, directly offsetting emissions". Best practice in relation to carbon sinks is to undertake as much practical action to avoid or reduce emissions before offsetting (residual) emissions[103]. Therefore, Objective CC.5 is intended to work with other proposed provisions in Change 1 to the RPS aimed at reducing gross emissions to be most effective in supporting Objectives CC.1 and CC.3. Objective CC.6 addresses the need for strategic adaptation planning with respect to the way in which we use and manage our natural and physical resources, to plan and implement actions that will help people and natural systems to adjust to the current and predicted effects of climate change. Objective CC.7 recognises the critical importance of knowledge and information to support people and businesses to both prepare for the changes to come and to work to reduce the impact of their lifestyles on greenhouse gas emissions. The IPCC finds that having the right policies, infrastructure, and technology in place to enable changes to our lifestyles and behaviour can result in a 40-70% reduction in greenhouse gas emissions by 2050. The evidence also shows that these lifestyle changes can result in significant improvements in our health and wellbeing[104]. Objective CC.8 responds to the particular vulnerability of Māori to the impacts of climate change and the importance of mana whenua / tangata whenua, as resource management partners, being empowered to make decisions that will help to develop climate-resilience in their communities. Objectives CC.6, CC.7 and CC.8 all align with, and help to give effect to, the National Adaptation Plan.	

[103] MfE Guidance for voluntary carbon offsetting – updated and extended until 31 December 2021
[104] https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_FinalDraft_FullReport.pdf

Gives effect to national direction?	The preferred option supports central government direction to: • achieve net zero greenhouse gas emissions by 2050, as required by the "Paris agreement" to limit global warning to 1.5°C; • ensure the planning system plays a key role in helping to reduce emissions alongside emission pricing and other policy initiatives as outlined in the Emissions Reduction Plan[105]; • incorporate and prioritise nature-based solutions to climate change into our planning and regulatory systems, aligning with the goals of the Aotearoa New Zealand Biodiversity Strategy (2020)[106] and the directives of the Emissions Reduction Plan; • recognise the role of indigenous biodiversity in providing ecosystem services relating to carbon sequestration consistent with the direction in the NPS-IB exposure draft; • increase the development and utilisation of renewable electricity generation in the region consistent with the policy direction in the NPS-REG; and • support people, places and systems to be resilient and able to adapt to the effects of unavoidable climate change in a fair, low-cost and ordered manner, as required by the National Adaptation Plan (2022)[107].	The limited nature of the status quo provisions in the RPS means that they contribute very little directive regional response to contribute to the national and global effort to limit global warning to 1.5°C. The status quo includes the minimum changes to the RPS required to respond to the NPS-UD. The objectives required by the NPS-UD to achieve well-functioning urban environments that support reductions in emissions are of a generic nature and do not provide specific direction to mitigate the effects of climate change through RPS direction. These objectives are focused on urban development and do not address the full suite of integrated responses required to address climate change in the Wellington Region.
Usefulness:		

[105] Te hau mārohi ki anamata Towards a productive, sustainable and inclusive economy AOTEAROA NEW ZEALAND'S FIRST EMISSIONS REDUCTION PLAN https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf

[106] Te Mana o te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020 (doc.govt.nz)

[107] Ministry for the Environment. 2022. Aotearoa New Zealand's first national adaptation plan. Wellington. Ministry for the Environment. https://environment.govt.nz/assets/publications/climate-change/MFE-AoG-20664-GF-National-Adaptation-Plan-2022-WEB.pdf

Will provide clear direction to decision makers and territorial authorities?	The proposed objectives provide clear and integrated direction to require, promote, support, and prioritise actions to reduce emissions, promote and support nature-based solutions, and drive and support adaptation planning. They provide clarity on the regional emission reduction targets to be achieved by 2030 and 2050 and will ensure that these targets are given statutory weight and consideration in planning and consenting processes in the region. The proposed objectives also provide clear direction on the benefits of achieving synergies with other environmental outcomes, including indigenous biodiversity and water quality, and the need for buy-in and support from iwi and hapū, businesses and communities to implement appropriate mitigation and adaptation responses.	The status quo provisions provide no direction to reduce emissions from sources other than transport and energy use, and in these areas the direction is only to seek a general reduction (not specific direction). This limited direction is now not aligned with more recent national direction and policy that the planning system plays a key role in reducing emissions across multiple sectors (as outlined in the Emission Reduction Plan).
Will it impose an unreasonable cost and disruption to the community?	Proposed Objective CC.3 provides a clear target to contribute to a 50% reduction in emissions by 2030 (based on 2019 levels) and achieve carbon neutrality (net-zero) by 2050. This aligns with the IPPC target, while recognising that local government interventions to mitigate climate change are part of a broader suite of actions required to meet regional, national and international emission reduction targets. It is possible to compare an emissions pathway set by the proposed RPS targets to a counterfactual scenario and quantify the additional emissions that would be saved as a result (and therefore the avoided costs of inaction). The approach to estimate the quantum of avoided emissions under the RPS target pathway is outlined in an internal technical memo to inform this section 32 evaluation[108] with the results shown in the figure below. The area between the lines is the total greenhouse gas emissions avoided if the RPS emission reduction targets are met, assuming a linear progression between the targets.	The status quo provisions do not impose unreasonable costs or disruption. However, the costs of not responding to climate change, or responding in a very slow and piece-meal way, will ultimately have severe costs to people and nature in the region. The status quo therefore presents unreasonable costs to the community, with future generations in the region bearing significantly increased costs due to inaction now. It is accepted in the international science community that the international and national cost of not acting is catastrophic for the human race, threatening hundreds of millions of people with hunger, water shortages, and severe economic deprivation. As concluded by Stern Review on the Economics of Climate Change, climate change is *"the greatest market failure the world has ever seen."* [113]

[108] Greater Wellington Internal Technical Memo, Evaluation of the Preferred Regional Greenhouse Gas Reduction Target for the Wellington Region, prepared by Jake Ross, August 2022
[113] Stern, N., 2006: Stern Review on the Economics of Climate Change

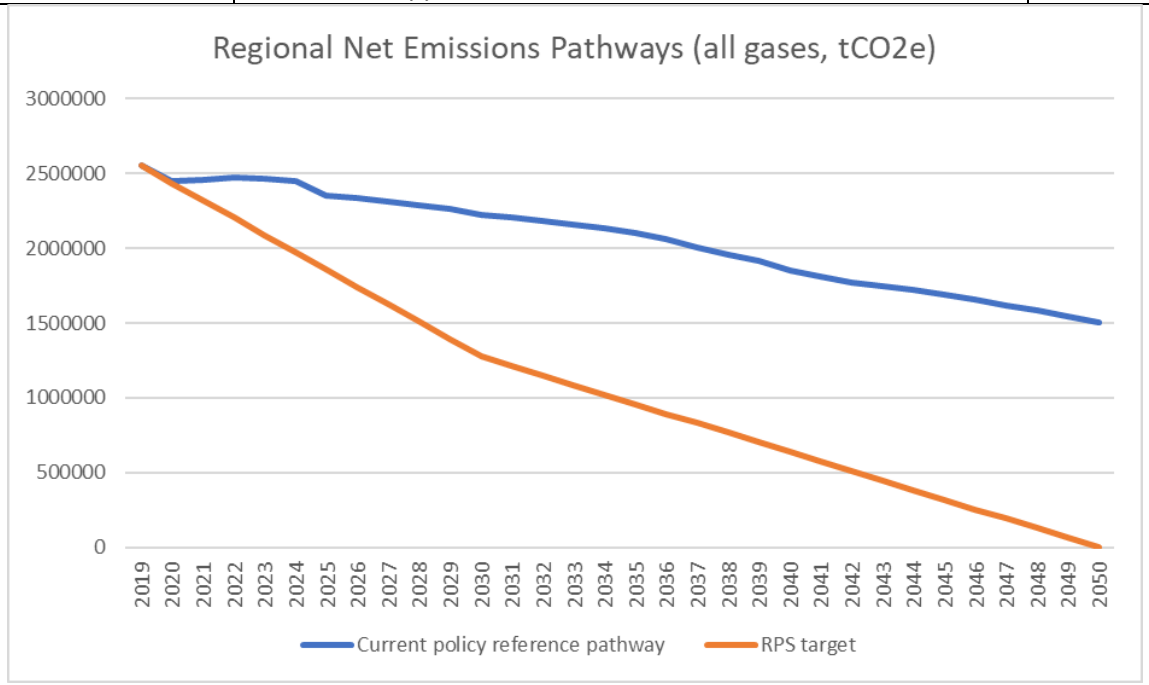
	The total cumulative emissions avoided/abated under the RPS pathway are 5,634 $kTCO_2e$ by 2030 and 30,725 $kTCO_2e$ by 2050. For these estimates of emissions avoided, it is then possible to estimate the avoided costs of the RPS emission pathway compared to the counterfactual scenario using the two methods outlined in section 6 – Treasury's shadow emission price estimate and the 'global social cost of carbon'. The three key areas of response are to: • Reduce gross greenhouse gas emissions; • Increase natural sinks to sequester carbon; and • Support adaptation, and build resilience for people and nature, to the impacts of climate change, particularly through the use of nature-based solutions. Achieving the objectives will result in short-term costs and disruption to the community. However, these costs and disruption are already anticipated by national legislation and direction. The long-term costs of inaction are significantly higher than those of acting in the short-medium term. The best available science tells us that we must reach the goal of limiting warming to 1.5°C goal to avoid catastrophic costs – but with every passing year of insufficient action, this becomes a harder (and more costly) task.[109] The explanation of the intent of the proposed climate change objectives above explains the rationale for the emission reduction targets in Objective CC.3 and the estimated volume of emissions reduced under this pathway compared to the 'counterfactual'. This then enables the benefits to the	

[109] https://climateanalytics.org/briefings/15c/

	community from the proposed RPS emission reduction targets (in terms of avoided emissions and associated costs) to be estimated using two methods outlined in section 5 of this report – Treasury's shadow emission price and the 'global social cost of carbon' (GSCC)[110]. This indicates that there are significant benefits to the community in terms of avoided costs from the RPS emission reduction pathway ranging, which range from $5,871m by 2050 (medium Treasury shadow emission price values) to $10,754m (Greater Wellington's GSCC value[111]). While these estimates are subject to a number of uncertainties and broad assumptions, they do indicate that there are significant benefits to the community from the proposed climate change objectives and that these benefits far outweigh the expected abatement costs (some of which are negative cost). The costs and disruption are not unreasonable in the context of the significant predicted effects of climate change for the region, such as the increasing cost of natural hazards to individuals, businesses, local and central government, and the predicted disruption to rural land use in the face of increasing extreme climate events. There are also efficiency gains to be realised through reducing emissions, such as significant health benefits, more efficient and sustainable land management practices, and reduced urban congestion. The New Zealand Climate Change Commission has concluded that the technology and the tools New Zealand needs to reach its climate targets already exist and that climate action is affordable.[112] The Commission also concluded that we are not on track to meet our emission reductions targets and that:	

[110] Greater Wellington Internal Technical Memo, Evaluation of the Preferred Regional Greenhouse Gas Reduction Target for the Wellington Region, prepared by Jake Ross, August 2022
[111] $350/CO2 equivalent tonne.
[112] New Zealand Climate Change Commission, 2021: *Ināia tonu nei: a low emissions future for Aotearoa*

	"Short-term thinking has delivered Aotearoa to where we are now in addressing climate change. Transformational change takes time, and people need certainty around the speed and direction of travel to invest in changing how they live, work and operate. There needs to be some hard work done now that will pay dividends later." The proposed objectives will provide clarity as to the outcomes sought by the RPS, while also acknowledging and providing the flexibility needed (not one-size-fits-all) for investment decisions and actions to achieve a low-emissions and climate-resilient region. A more certain regulatory setting is important to facilitate community and business responses to climate change and better support economic decisions.	



Can direction be reasonably implemented?	The objectives align with the objectives and work programmes of central government to reduce emissions, increase nature-based solutions and increase climate change adaptation efforts. The regional council can reasonably implement the objectives using its powers under the RMA, combined with local, national and international actions to effectively mitigate and adapt to climate change. The reasonableness of implementation actions and methods to give effect to the objectives will also be assessed in more detail through future regional plan changes processes to give effect to the RPS.	The status quo provisions are generic and can be reasonably implemented (but with limited effect).
Achievability:		
Can be achieved with tools and resources available, or likely to be available, to Greater Wellington Regional Council or those implementing the RPS?	The Resource Management Amendment Act 2020 will enable regional councils to regulate and consider the effects of discharges of greenhouse gas emissions on climate change from 20 November 2022[114]. The RMA already gives Greater Wellington Regional Council sufficient powers to drive other key climate solutions. The preferred option can therefore be implemented, and the target worked towards, using Greater Wellington Regional Council powers, authorities, and skills, although additional resources will be required to implement the objectives (e.g., additional non-regulatory support through a climate change extension programme). Further, to be effective the preferred option will require partnering with mana whenua / tangata whenua, and collaboration with territorial authorities, other key agencies and organisations, landowners, and the community. A regional leadership role, alongside use of powers by Greater Wellington Regional Council, is critical to reduce	The status quo option is achievable using Greater Wellington Regional Council tools and resources.

[114] By repealing the current 'statutory bars' in section 70A, 70B, 104E and 104F that were inserted in 2004 through Resource Management (Energy and Climate Change) Amendment Act 2004.

	emissions and drive ambitious adaptation and resilience measures.	

Natural character in the Coastal Environment evaluation – appropriateness of objectives

Natural character		
Objective/purpose of this change: The purpose of this set of changes is to amend the relevant policy in the RPS (Policy 3 – Protecting high natural character in the coastal environment) to achieve consistency with the NZCPS. The current policy incorporates aspects of social values, which are not relevant to natural character in accordance with NZCPS Policy 13.		
Intent:		
The intent of amending RPS Policy 3 is to ensure the policy approach for protecting high natural character in the coastal environment gives effect to NZCPS Policy 13. Natural character ratings are comprised of abiotic, biotic, and experiential values (as directed by NZCPS Policy 13), thus social values should not be considered when identifying high natural character in the coastal environment. The policy change will then set out an appropriate approach to achieve Objective 4 of the RPS.		
Other objective options:		
Status quo: Retain Policy 3 as drafted		
Other relevant objectives both proposed and operative:		
Objective 4	The natural character of the coastal environment is protected from the adverse effects of inappropriate subdivision, use and development.	
	Preferred option – amend RPS for consistency with NZCPS	Status quo – no amendment to natural character provisions
Relevance:		
Addresses the relevant resource management issue?	The NZCPS Policy 13 clarifies that natural character is comprised of biotic, abiotic and experiential values. The preferred approach gives effect to the direction of NZCPS Policy 13 and therefore will addresses the relevant resource management issue of protecting high natural character in the coastal environment.	In addition to the values which comprise natural character (biotic, abiotic and experiential values), the status quo also directs social values to be considered, as an additional assessment criterion. The inclusion of social values does not give effect to the direction of NZCPS Policy 13, the status quo will not accurately assess high natural character and therefore is not appropriately addressing the relevant resource management issue.

Gives effect to national direction?	The preferred option gives effect to NZCPS Policy 13.	The status quo does not accurately give effect to NZCPS Policy 13.
Usefulness:		
Will provide clear direction to decision makers and territorial authorities?	The preferred approach provides a clear direction to territorial authorities and decision makers, that the approach for protecting natural character (in the coastal environment) in Policy 3 of the RPS gives effect to, and is consistent with, the direction of Policy 13 of the NZCPS.	The status quo does not provide a clear direction to territorial authorities and decision makers, given the approach (adding social values as an additional assessment criteria, in addition to the prescribed values set out in NZCPS Policy 13) for protecting natural character in the coastal environment does not give effect to NZCPS Policy 13.
Reasonableness:		
Will it impose an unreasonable cost and disruption to the community?	The preferred approach will not put unreasonable costs or disruption on the community. Clarifying the approach to assessing natural character consistent with the NZCPS will avoid costs associated with assessing values that are not relevant.	The status quo will put unreasonable costs on local authorities to engage with communities and mana whenua / tangata whenua partners to determine social values and then subsequently incorporate social values into a natural character assessment. Further, given inclusion of social values is generally not accepted by specialists who undertake these assessments, it would likely be problematic and/or more costly to engage a specialist (such as a landscape planner) to follow a methodology anticipated in the current policy.
Can direction be reasonably implemented?	Yes, it can be reasonably implemented.	Given the status quo does not give effect to NZCPS Policy 13, it cannot be reasonably implemented.
Achievability:		
Can be achieved with tools and resources available, or likely to be available, to Greater Wellington Regional Council or those implementing the RPS?	The preferred option is achievable.	Implementing current Policy 3 of the RPS can be achieved using Greater Wellington Regional Council tools and resources.

Te Mana o te Wai objective evaluation – appropriateness of Te Mana o te Wai objective

Te Mana o te Wai
Replace Objective 12: Te Mana o te Wai objective Natural and physical resources of the region are managed in a way that prioritises: (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future; and Te Mana o te Wai encompasses six principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this RPS and its implementation. The six principles are: (a) Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater (b) Kaitiakitanga: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations (c) Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others (d) Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future (e) Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations, and (f) Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation. And the Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa. ~~The quantity and quality of fresh water:~~ ~~(a) meet the range of uses and values for which water is required;~~ ~~(b) safeguard the life-supporting capacity of water bodies; and~~ ~~(c) meet the reasonably foreseeable needs of future generations.~~ Note the evaluation of the statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa are provided separately in the two tables that follow.

Intent of change:		
To give effect to NPS-FM section 3.2(3) for Te Mana o te Wai objectives The intent is to add expressions of what Te Mana o Te Wai means from each of the six iwi of the region. This plan change includes expressions of Te Mana o Te Wai from Rangitāne o Wairarapa and Kahungunu ki Wairarapa. Others will be added in future plan changes, or as part of the Schedule 1 process through submissions.		
Other objective options:		
The NPS-FM is directive. There are no other options considered reasonable. Status quo: Do not add Te Mana o Te Wai objective		
Other relevant objectives both proposed and operative:		
Objective 13	The region's rivers, lakes and wetlands support healthy functioning ecosystems.	
	Preferred option Add new Te Mana o te Wai Objective to replace Objective 12	Status quo Retain existing objectives, and do not add Te Mana o Te Wai objective
Relevance:		
Addresses the relevant resource management issue?	The NPS-FM addresses significant freshwater degradation issues. Giving effect to the NPS-FM will address these issues	Status quo does not address freshwater issues to the extent required by the NPS-FM. Objective 12 and supporting policies are inconsistent with the NPS-FM as they do not prioritise uses and values
Gives effect to national direction?	Yes specifically responds to the NPS-FM.	No does not give effect to the NPS-FM.
Usefulness:		
Will provide clear direction to decision makers and territorial authorities?	Direction is provided for the preparation of both Regional and District Plans as required by the NPS-FM	The existing provisions are inadequate to give effect to the NPS-FM
Will it impose an unreasonable cost and disruption to the community?	The provisions will impose significant costs (over the status quo) to the regional council, Territorial Authorities and resource users during the transition phase. There are long term benefits for the community and avoided costs associated with not having good fresh water. The government considered the costs and benefits in developing the NPS-FM and considered the costs to be justified. Costs associated with the	The status quo does not impose unreasonable costs immediately, however as it does not give effect to the NPS-FM. Retaining the status quo will delay and inflate the cost and disruption to both the environment and the community which is unavoidable in implementing the NPS-FM.

	preferred option for the Greater Wellington Region are consistent with, not additional to, the NPS-FM.	
Can direction be reasonably implemented?	Yes, through regulation in regional and district plans, as well as non-regulatory methods	The status quo can be reasonably implemented through the existing RPS.
Achievability:		
Can be achieved with tools and resources available, or likely to be available, to Greater Wellington Regional Council or those implementing the RPS?	Yes. There is no choice but to give effect to the NPS-FM. Freshwater visions are required to be *goals that are ambitious but reasonable (that is, difficult to achieve but not impossible)* and within *a timeframe to achieve those goals that is both ambitious and reasonable (for example, 30 years after the commencement date)*	The status quo can be implemented but will not achieve the NPS-FM objectives.

Te Mana o te Wai objective evaluation - Te Mana o te Wai expression - Rangitāne o Wairarapa

Te Mana o te Wai
The Statement of Rangitāne o Wairarapa forms part of proposed Objective 12 and is set out below Table 4 in Chapter 3.4. The Statement sets out: • Vision • Principles • Objectives 01-07 for Hauora o te Wai, Tino Rangatiratanga, Mauri o te Wai, Ako o te Wai, Tikanga ā hāpu, Mana Mātauranga ā hāpu, and Rangahau me Auaha • Step changes to achieve the objectives.
Intent of change:
To give effect to section 3.2(3) of the NPS FM which states that every regional council must include an objective in its regional policy statement that describes how the management of freshwater in the region will give effect to Te Mana o te Wai. The proposed objectives are Rangitāne o Wairarapa's expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in their rohe.
Other objective options:
The NPS-FM is directive and requires that objectives that describe how management of freshwater in the region will give effect to Te Mana o te Wai are included in the Regional Policy Statement. The NPS-FM further directs that every local authority must actively involve tangata whenua (to the extent they wish to be involved) in freshwater management, including in identifying the local approach to giving effect to Te Mana o te Wai (see clause 3.4(1)) and in changing the regional policy statement in relation to freshwater management. Te Mana o te Wai is a Te Ao Māori concept. Therefore, it should be

expressed, interpreted and applied by tangata whenua. The Regional Council has asked Rangitāne o Wairarapa to provide their expression of this concept and how it should be applied. Therefore no other options are considered reasonable. Status quo: The status quo would be to retain current Objective 12 and not include Rangitāne o Wairarapa expression of Te Mana o Te Wai. Objective 12 does not accurately reflect the concept of Te Mana o te Wai as set out in the NPS-FM.	
Other relevant objectives both proposed and operative:	
Various	There are a number of other objectives, both proposed and operative, which are relevant to the management of freshwater and Te Mana o te Wai, including those that relate to integrated management, freshwater, climate change and resource management with mana whenua / tangata whenua. The most relevant operative objective is Objective 12. A new objective to replace operative Objective 12 is proposed (see table above).
Objective 12 (operative)	The quantity and quality of fresh water: (a) meet the range of uses and values for which water is required; (b) safeguard the life-supporting capacity of water bodies; and (c) meet the reasonably foreseeable needs of future generations.
New Objective (proposed)	Natural and physical resources of the region are managed in a way that prioritises: (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future; and Te Mana o te Wai encompasses six principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this RPS and its implementation. The six principles are: (a) Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater (b) Kaitiakitanga: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations (c) Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others

	(d) Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future (e) Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations, and (f) Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation. And the Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa.	
	Replace Objective 12 with the new Te Mana o te Wai objectives and Rangitāne statement	Status quo – Retain operative Objective 12 unchanged
Relevance:		
Addresses the relevant resource management issue?	Yes, the Rangitāne expression of Te Mana o te Wai and Te Mana o te Wai objectives address the relevant resource management issue, by defining what Rangitāne o Wairarapa consider is necessary to give effect to Te Mana o te Wai. Collectively the objectives address the well-being of wai in a holistic sense, capturing the spiritual, cultural and physical dimensions of Wai, and encompass the principles of mana whakahaere, kaitiakitanga and manaakitanga as set out in the NPS-FM.	The status quo does not reflect the fundamental concept of Te Mana o te Wai as defined in the NPS-FM 2020. Objective 12 does not accurately reflect the hierarchy of obligations or provide protection for the mauri of the wai; nor does it capture the aspirations/direction of tangata whenua as to how to give effect to Te Mana o te Wai in the local context.
Gives effect to national direction?	Yes, the Rangitāne expression of Te Mana o te Wai and Te Mana o te Wai objectives have been developed to respond directly to the NPS FM direction in Part 3 and specifically clause 3.2(3). The proposed objectives are consistent with the objective 2.1 in the NPS FM.	Objective 12 and supporting policies are inconsistent with the fundamental concept of Te Mana o te Wai, which places the health and well-being of waterbodies and freshwater ecosystems first and foremost, and which is focused on protecting the mauri of the wai. Continuing with the status quo will not achieve the sustainable management purpose of the RMA.
Usefulness:		
Will provide clear direction to decision makers and territorial authorities?	Yes, the Rangitāne expression of Te Mana o te Wai and the Te Mana o te Wai objectives provide direction as to what needs to be achieved to protect the mauri of the wai and restore and preserve the balance between the water, the wider	The existing provisions do not provide appropriate direction as to how to achieve Te Mana o te Wai. Objective 12 does not set the health and well-being of waterbodies and

	environment and the community (see clause 1.3(1) of the NPS-FM).	freshwater ecosystems as the first priority, or protect the mauri of the wai.
Will it impose an unreasonable cost and disruption to the community?	The provisions will impose increased costs (over the status quo) to the regional council, territorial authorities and resource users. More upfront costs will save money in the long run and be more sustainable for the environment. These costs are seen as necessary, because the status quo has not safe-guarded the life supporting capacity of water. Nor has the status quo provided for active participation of tangata whenua in decision making or natural resource management. Tangata whenua values, Te Ao Māori and mātauranga Māori have not been given appropriate recognition in decision-making. There will be considerable physical, social, cultural and wider economic benefits, for the environment, mana whenua and the wider community of adopting and implementing these objectives, because providing for the health of the Wai, provides for the health and wellbeing of people. The NPS-FM is national direction, and the costs and benefits of implementing the NPS-FM have been considered through that process. The s32 analysis for government's Essential Freshwater package estimates that there will be a net cumulative benefit of implementing the NPS-FM (of 193 million per annum over 30 years)[115]. The government has recognised that the existing freshwater management framework is not achieving the sustainable management of freshwater resources and that greater weight needs to be given to the kaitiaki role of tangata whenua and the relationships that iwi, hapū and whānau have with freshwater. It is not acceptable for future generations to bear the costs of	The status quo has not been sufficient in halting the ongoing degradation of freshwater in the region or in reversing past damage and as a consequence, significant adverse cultural, social and economic effects have occurred, with particularly adverse impacts on the relationship between tangata whenua and freshwater and te taiao. This has had and will continue to have a significant cost for the wellbeing of current and future generations, with a disproportionately adverse effect on Māori.

[115] Action for Healthy Waterways. Section 32 Evaluation. Ministry for the Environment. Accessed at: https://environment.govt.nz/assets/Publications/Files/action-for-healthy-waterways-section-32-evaluation-report.pdf

	further degradation of freshwater, especially in light of the challenges of climate change.	
Can direction be reasonably implemented?	Yes. The objectives are strategic and broad ranging and implementation is likely to require a stepped approach over time. This is appropriate at the RPS level, which sets the strategic direction for the region, and in the context of upcoming legislative reform, including the Strategic Planning Act. Tangata whenua recognise that implementation will require progressive steps over a period of time. Implementation will also require a range of regulatory and non-regulatory methods, and a willingness to do things differently, including by recognising and incorporating other knowledge systems. The NPS-FM directs that the regional council must enable the application of diverse systems of value and knowledge, such as mātauranga Māori, to the management of freshwater (see clause 3.2(2)(d)).	The status quo can be reasonably implemented through the existing RPS. The status quo does not explicitly provide for the application of diverse knowledge or value systems to freshwater management, such as mātauranga Māori.
Achievability:		
Realistically can be achieved using GWRC powers, authorities and skills?	As indicated above, achieving the objectives will require a progressive and stepped approach, and may require new ways of working and a combination of regulatory and non-regulatory methods. Mechanisms exist within the RMA to achieve these objectives, including through transfer or delegation of powers under s33, mana whakahono a rohe arrangements under subpart 2 of Part 5 and Joint Management Agreements under section 36B. The NPS-FM directs regional councils to actively involve tangata whenua in freshwater management, including decision making processes (see clause 3.2(2)), to the extent they wish to be involved. This includes working with tangata whenua to investigate the use of the mechanisms listed above (see clause 3.4(3)), and developing and implementing mātauranga Māori and other monitoring. Tangata whenua	Yes. However the status quo does not explicitly provide for the active involvement of tangata whenua in freshwater management.

	will require support for their role in implementing these objectives, (for example to undertake monitoring in mātauranga Māori), and this may require financial, technical or capacity building support from the regional council.	

Te Mana o te Wai objective evaluation – Te Mana o te Wai expression - Kahungunu ki Wairarapa

Te Mana o te Wai
The Statement of Kahungunu ki Wairarapa forms part of Objective 12 and is set out below Table 4 in Chapter 3.4. The Statement sets out: • Vision • Values and objectives • Objectives 01-06 to connect tangata whenua to water, keep water healthy, Mātauranga to inform the Mana of specific water bodies, appreciate the mana of water through monitoring, communicate how Te Mana o te Wai is significant, and reflect the Mana water brings people through rights and interests.
Intent of change:
The intent of this change is to give effect to section 3.2(3) of the NPS-FM which states that every regional council must include an objective in its regional policy statement that describes how the management of freshwater in the region will give effect to Te Mana o te Wai. The proposed objectives are Kahungunu ki Wairarapa's expression of how Te Mana o te Wai applies to water bodies and freshwater ecosystems in their rohe.
Other objective options:
The NPS-FM requires Greater Wellington to include objectives that describe how management of freshwater in the region will give effect to Te Mana o te Wai in the Regional Policy Statement. The NPS-FM further directs that every local authority must actively involve tangata whenua (to the extent they wish to be involved) in freshwater management, including in identifying the local approach to giving effect to Te Mana o te Wai (see clause 3.4(1)) and in changing the regional policy statement in relation to freshwater management. Te Mana o te Wai is a Te Ao Māori concept. It should be expressed, interpreted and applied by tangata whenua. The Regional Council has asked Kahungunu ki Wairarapa to provide their expression of Te Mana o te Wai and how it should be applied. For that reason, no other options are considered reasonable. Status quo: The status quo would be to not include Kahungunu ki Wairarapa's expression of Te Mana o te Wai and to keep the current Objective 12 in the RPS.
Other relevant objectives both proposed and operative:
There are a number of other objectives, both proposed and operative, which are relevant to the management of freshwater and Te Mana o te Wai, including those that relate to integrated management, freshwater, climate change and resource management with tangata whenua. The most relevant

operative objective is Objective 12. A new Objective 12 has been proposed to replace the operative Objective 12 that repeats the Fundamental concept of Te Mana o te Wai from the NPS FM. Both the operative and proposed objective are provided below.	
Objective 12 (operative)	The quantity and quality of fresh water: (a) meet the range of uses and values for which water is required; (b) safeguard the life-supporting capacity of water bodies; and (c) meet the reasonably foreseeable needs of future generations.
Objective 12 (proposed)	Natural and physical resources of the region are managed in a way that prioritises: (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future; and Te Mana o te Wai encompasses six principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this RPS and its implementation. The six principles are: (a) Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater (b) Kaitiakitanga: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations (c) Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others (d) Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future (e) Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations, and (f) Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation. And the Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa.

	Replace Objective 12 with the new Te Mana o te Wai objectives (and Kahungunu ki Wairarapa statement)	Status quo – Retain operative Objective 12 unchanged
Relevance:		
Addresses the relevant resource management issue?	Kahungunu ki Wairarapa's expression of Te Mana o te Wai address the relevant resource management issues in the RPS. In particular, tangata whenua values have been insufficiently taken into account in relation to freshwater decision-making – leading to a declining quality/quantity of freshwater over many years and adversely impacting the relationship between tangata whenua and the taiao. Tangata whenua hold significant cultural, social, economic, and spiritual connections to the taiao (environment). This includes a responsibility and obligation as kaitiaki of care and protection for future generations; and kaitiriao: and to find natural based solution that include and improve ecosystems. In addition, Māori have made great use of the environment and worked in conjunction with it to develop their physical world (resources) sustainably, bringing certainty and safety to their communities and those of future generations. These practices and way of life have been eroded drastically by contemporary resource management practices and policies. The management of rivers, aquifers, lakes, wetlands, and waterways in general is seldom undertaken in a way that is consistent with Te Ao Māori view, let alone in keeping with local tikanga or kawa. Despite the best efforts of tangata whenua to work with Councils, there has been little positive change to environmental outcomes over the years. Kahungunu ki Wairarapa's expression of Te Mana o te Wai provides clarity to decision-makers about the Kahungunu ki Wairarapa's priorities and values in relation to Te Mana o Te Wai so that they can more effectively be taken into account in future. In addition, it also provides a pathway for improvement of the health of waterbodies in a holistic manner including through: • Actively involving tangata whenua in decision-making;	The status quo does not reflect the fundamental concept of Te Mana o te Wai as defined in the NPS-FM 2020 – or provide clarity about how tangata whenua values in relation to Te Mana o Te Wai should be given effect to in decision-making.

	• Understanding and using Mātauranga Māori / monitoring; • Leadership and rebalancing of freshwater; • Communication; and • Addressing rights and interests.	
Gives effect to national direction?	Kahungunu ki Wairarapa expression of Te Mana o te Wai gives effect to the NPS FM direction, in particular to: • Objective 2.1 in the NPS FM around managing resources in a way that is consistent Te Mana o te Wai; • Clause 3.2(2)(a), to actively involve tangata whenua in freshwater management, including decision making processes to the extent they wish to be involved. • Clause 3.2(2)(d) to enable the application of diverse systems of value and knowledge, such as mātauranga Māori, to the management of freshwater; and • In particular, Clause 3.2(3) that requires the regional council to include an objective in its regional policy statement that describes how it will give effect to Te Mana o Te Wai. Te Tiriti o Waitangi (the Treaty of Waitangi) as the foundation of the Crown and iwi/hapū relationships regarding resource management matters is also very relevant to this mahi. In 1987, the Court of Appeal determined the Treaty principles as part of a decision on a case bought by the Māori Council[116]. The Regional Policy Statement should recognise the pending legislation, Joint Deed of Settlement and the Ngāti Kahungunu ki Wairarapa Tamaki-Nui-A-Rua. Aspects that are important with	The Regional Policy Statement as it stands does not give effect to the NPS-FM or include an objective required under part 3.2(3) of the NPS-FM.

[116] The Treaty Principles were determined as being:
- The duty to act reasonably and in good faith
- Active Crown protection of Māori interests – the duty of the Crown was not just passive but extended to active protection of Māori people in the use of their lands and waters 'to the fullest extent practicable'
- the government should make informed decisions
- the Crown should remedy past grievances
- the Crown has the right to govern

	respect to water include but are not restricted to: The Statutory Committee and The Status of Wairarapa Moana.	
Usefulness:		
Will provide clear direction to decision makers and territorial authorities?	The Kahungunu ki Wairapapa expression of Te Mana o te Wai helps to provide clarity around the meaning of Te Mana o te Wai so that the health and wellbeing of waterbodies can be effectively put first. In addition, the expression of Te Mana o te Wai provides the strategic level direction needed for implementing the National Objectives Framework under the NPS-FM, through the regional plan. Kahungunu ki Wairarapa consider if this term and concept are not properly given effect to (i.e., if recognition is not meaningful and it is being referred to only in a tokenistic manner) they should be removed from national policy.	The implementation of the current regulatory framework in the Greater Wellington region doesn't give effect to Te Mana o te Wai nor the preservation of Mauri, Mahinga Kai, and rights of tangata whenua in general.
Will it impose an unreasonable cost and disruption to the community?	The provisions will impose some direct increased costs (over the status quo) to the regional council, territorial authorities and resource users. In particular, it is likely to include greater resourcing of tangata whenua to be actively involved in the improvement of freshwater and monitoring the health of the water bodies. However, in relation to the status quo additional costs are inline where the council is already heading including in better resourcing and involvement of tangata whenua in decision-making around freshwater. This additional cost is justified given the fundamental importance of water to human health and the severe harm that has been caused to tangata whenua (both directly and indirectly) through its degradation. The NPS-FM is national direction, and the costs and benefits of implementing the NPS-FM have been considered through that process. The s32 analysis for government's Essential Freshwater package estimates that there will be a net cumulative benefit of implementing the NPS-FM (of $193 million per annum over 30	The status quo has not been sufficient in halting the ongoing degradation of freshwater or in addressing frustrations and disappointments that have inadequately and continually failed to address the long-standing concerns of tangata whenua. As a consequence, significant adverse cultural, social and economic effects have occurred, with particularly adverse impacts on the relationship between tangata whenua and te taiao. This has had and will continue to have a significant cost for the wellbeing of current and future generations, with a disproportionately adverse effect on Māori.

	years)[117]. The government has recognised that the existing freshwater management framework is not achieving the sustainable management of freshwater resources and that greater weight needs to be given to the kaitiaki role of tangata whenua and the relationships that iwi, hapū and whānau have with freshwater. It is not acceptable for future generations to bear the costs of further degradation of freshwater, especially in light of the challenges of climate change.	
Can direction be reasonably implemented?	The objectives set the strategic direction to be implemented at a more granular/spatial level through the setting of targets, outcomes and limits (i.e. the National objectives framework) under the regional plan that apply to Freshwater Management Units. In addition, it will also provide appropriate direction for 'action plans' at the catchment level also required under the NPS-FM. Kahungunu ki Wairarapa's expression of Te Mana o te Wai and values is the first step in the process to guide what the rest of the framework will focus on. Tangata whenua recognise that implementation will require progressive steps over a period of time.	The status quo would not provide sufficient direction to the development of the National Objectives Framework under the NPS-FM.
Achievability:		
Realistically can be achieved using GWRC powers, authorities and skills?	The requirements as part of Kahungunu ki Wairarapa's expression of Te Mana o Te Wai – in particular, involvement of tangata whenua in decision making as well as greater monitoring and use of Mātauranga Māori are things that can be influenced through the RPS. Implementation of Kahungunu ki Wairarapa's objectives will require the building of skills within councils on Mātauranga Māori and Te Ao Māori to ensure they are delivered effectively in partnership with Kahungunu ki Wairarapa. In addition, mechanisms exist within the RMA to achieve these objectives, including through transfer or delegation of powers under s33, mana whakahono a rohe arrangements under subpart 2 of Part 5 and Joint Management Agreements under section 36B.	The status quo does not explicitly provide for the active involvement of tangata whenua in freshwater management.

[117] Action for Healthy Waterways. Section 32 Evaluation. Ministry for the Environment https://environment.govt.nz/assets/Publications/Files/action-for-healthy-waterways-section-32-evaluation-report.pdf

Indigenous ecosystems evaluation – appropriateness of objectives

Indigenous ecosystems
Objectives 16, 16A, 16B, 16C: Indigenous Ecosystems **Objective 16** Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are ~~maintained~~ *protected*, enhanced, and restored to a healthy functioning state. **Objective 16A** The region's indigenous ecosystems are *maintained*, enhanced, and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to *Te Rito o te Harakeke*. **Objective 16B** Mana whenua / tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous *ecosystem health* and well-being, are given effect to in decision-making, and mana whenua / tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity. **Objective 16C** Landowner and community values in relation to indigenous biodiversity are recognised and provided for and their roles as stewards are supported.
Intent of change:
Objective 16 is amended to acknowledge that indigenous ecosystems and habitats can have significant values that are broader than for indigenous biodiversity, e.g. modified wetland ecosystems can have significant values for improving water quality or for slowing the flow of water. Protecting and restoring ecosystem values is of particular significance for increasing resilience, for both natural systems and people, to the impacts of climate change. An amendment to replace 'maintain' with 'protect' will provide consistency with RMA s6(c) which requires protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as a matter of national importance that must be recognised and provided for. Protection is already used in Policy 24 which requires district and regional plans to include provisions to protect indigenous ecosystems and habitats with significant indigenous biodiversity values. The amendment to the objective will therefore result in little additional impact but will provide improved certainty in the outcome sought and achieve better alignment with the RMA and policy direction in the exposure draft NPSIB. The objective also incorporates the concept of *Te Rito o te Harakeke* which is a fundamental concept at the core of the exposure draft NPS-IB. Te Rito o te Harakeke refers to the need to maintain the integrity of indigenous biodiversity. It recognises the intrinsic value and mauri of indigenous biodiversity as well

as people's connections and relationships with it, that our health and wellbeing are dependent on the health and wellbeing of indigenous biodiversity and that, in return, we have a responsibility to care for it. The concept also acknowledges the web of interconnectedness between indigenous species, ecosystems, the wider environment, and the community.

The intent of new objective 16A is to provide for the maintenance, enhancement and restoration of indigenous biodiversity generally, not just significant indigenous biodiversity, as required by the RMA s30(ga)[118], the ANZBS[119] and the exposure draft NPS-IB (2022)[120]. This objective also recognises that healthy ecosystems are more resilient to increasing environmental pressures, of critical importance to support indigenous biodiversity and its associated values in the face of the unavoidable effects of climate change.

The intent of new Objective 16B is to recognise and provide for Māori values for indigenous biodiversity and their role as kaitiaki – this is required by Outcome 4 of Te Mana o te Taiao, which aims to ensure that Te Tiriti partners, whānau, hapū and iwi are exercising their full role as rangatira and kaitiaki. It is also aligned with the exposure draft NPS-IB policy direction and implementation requirements in terms of:

(a) Its fundamental concept of Te Rito o te Harakeke, which requires incorporation of Te Ao Māori and mātauranga Māori, and engagement with mana whenua / tangata whenua.
(b) Clear policy direction to recognise the role of mana whenua / tangata whenua as kaitiaki and enable mana whenua / tangata whenua to exercise this role for indigenous biodiversity in their rohe.
(c) Requirements to identify and protect taonga species, populations, and ecosystems (in agreement with mana whenua / tangata whenua).

New objective 16C seeks to better recognise the important role that landowners have as stewards for indigenous biodiversity. This aligns the exposure draft NPS-IB which seeks to better recognise and provide for the role of landowners and community members as stewards of indigenous biodiversity, with a number of provisions supporting landowner and community restoration and conservation efforts. It also gives effect to Objectives 8 and 9 of the ANZBS which seek to better support and collaborate with landowners and community members on conservation.

Change 1 is an important opportunity to align the RPS with the imminent NPS-IB. While this is at exposure draft stage now (so not gazetted), the direction is clear and If the NPS-IB is gazetted later this year as intended by the government, Council can address any matters of misalignment through the Schedule 1 process. Feedback from mana whenua / tangata whenua partners is very supportive of amended indigenous biodiversity provisions, including strengthened and new provisions to recognise and provide for their values.

Other objective options:

[118] Every regional council shall have the following functions for the purpose of giving effect to this Act in its region: (ga) the establishment, implementation, and review of objectives, policies, and methods for maintaining indigenous biological diversity

[119] ANZBS Objective 1: The health, integrity and connectivity of ecosystems have been maintained and/or restored, including in human-dominated areas

[120] NPS-IB Exposure draft 2022: To protect, maintain, and restore indigenous biodiversity …

Status quo: This would retain current Objective 16 and there would be no new objectives to better provide for the maintenance of (significant and non-significant) indigenous biodiversity, recognise the critical interconnection of biodiversity with climate change mitigation and adaptation, or recognise and provide for the values and roles of iwi and landowners as kaitiaki and stewards of indigenous biodiversity. This option would put on hold any changes to the RPS until the NPS-IB is gazetted. Changes would be required in the future to give effect to the NPS-IB within a timeframe set in the NPS. Territorial authorities are supportive of the status quo option at this time.	
Other relevant objectives both proposed and operative:	
Objective A	Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (a) incorporates mātauranga Māori; and (b) recognises ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and (c) protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and (d) recognises the dependence of humans on a healthy natural environment; and 1. recognises the role of both natural and physical resources in providing for the characteristics and qualities of well-functioning *urban environments*; and 2. responds effectively to the current and future pressures of climate change, population growth and development.
Objective CC.4	*Nature-based solutions* are an integral part of *climate change mitigation* and *adaptation*, improving the health and resilience of people, biodiversity, and the natural environment.
Objective CC.5	By 2030, there is an increase in the area of *permanent forest* in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well-being.
Objective 12	Natural and physical resources of the region are managed in a way that prioritises: (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future; and *Te Mana o te Wai* encompasses six principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this RPS and its implementation.

	The six principles are: (a) Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater (b) Kaitiakitanga: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations (c) Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others (d) Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future (e) Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations, and (f) Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation. And the Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa
Objective 13	The region's rivers, lakes and wetlands support healthy functioning ecosystems.
Objective 20	Natural hazard and *climate change mitigation and adaptation* activities minimise the risks from natural hazards and impacts on *Te Mana o te Wai*, *Te Rito o te Harakeke*, natural processes, indigenous ecosystems and biodiversity.
Objective 22	Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning *urban environments*, which: 1. Are compact and well designed; and 2. Provide for sufficient development capacity to meet the needs of current and future generations; and 3. Improve the overall health, well-being and quality of life of the people of the region; and 4. Prioritise the protection and enhancement of the quality and quantity of freshwater; and 5. Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and 6. Support the transition to a low-emission and climate-resilient region; and 7. Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and

	8. Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and 9. Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and 10. Provide for commercial and industrial development in appropriate locations, including employment close to where people live; and 11. Are well connected through multi-modal (private vehicles, public transport, walking, micro-mobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space.	
Objective 30	Soils maintain those desirable physical, chemical and biological characteristics that enable them to retain their ecosystem function and range of uses.	
	Preferred option – Amend Objective 16, new objectives 16A, 16B, 16C	Status quo – retain current Objective 16
Relevance:		
Addresses the relevant resource management issue?	The amended and new objectives better address the identified resource management issues for indigenous ecosystems. Amended Objective 16 recognises that indigenous ecosystems provide significant values that are broader than just for biodiversity, e.g., ecosystem functions and services such as holding water in the landscape and improving water quality. Both Objective 16 and 16A recognise the importance of indigenous ecosystems in adapting to, and mitigating the effects of, climate change. Objective 16A recognises the importance of maintaining all indigenous ecosystems. Objectives 16B and 16C recognise the values of indigenous ecosystems for mana whenua / tangata whenua, landowners and community members and to ensure that their roles as kaitiaki and stewards are provided for, which is a key resource management issue to address in order to better protect, maintain and restore indigenous biodiversity in the region.	Does not address the relevant resource management issues. Provides no recognition for the other ecosystem values and services of significant areas (including carbon sequestration/climate regulation), the importance of indigenous biodiversity outside significant areas, or the roles of biodiversity in mitigating and adapting to climate change. Does not specifically recognise the values or roles of mana whenua / tangata whenua, landowners, or community members in protecting, maintaining, and restoring indigenous biodiversity in the region.

Gives effect to national direction?	The amended and new objectives align with the direction of the ANZBS and anticipated policy direction in the exposure draft NPS-IB, and support central government's climate change objectives as set out in the Emissions Reduction Plan and the National Adaptation Plan. Some of the implementing policies seek to ensure that action is taken earlier than currently proposed in the exposure draft NPSIB which is assessed further in section 9 of this report. This is considered justified given that the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna has been a matter of national importance since 1991 (RMA s6), the potential delay in the NPSIB coming into effect (noting that, while the current version has been in development since 2018, the government first discussed the prospect of a NPS on biodiversity in 1999, with a number of different versions developed over the intervening period and none reaching notification[121]), and continued inaction by some local authorities in the region to identify and protect significant natural areas despite the existing direction in the RPS since 2013.	Operative Objective 16 does not fully give effect to the Greater Wellington Regional Council functions under RMA s30(1)(c)(iiia) or (ga), the direction of the ANZBS, nor the anticipated policy direction in exposure draft NPS-IB. It also does not recognise the value that indigenous ecosystems provide to support the achievement of the government's climate change objectives as set out in the National Emissions Reduction Plan and the draft National Adaptation Plan.
Usefulness:		
Will it provide clear direction to decision makers and territorial authorities?	The amended and new objectives provide clear direction on the new issues that need to be addressed to better protect, maintain, and restore indigenous biodiversity in the region. The proposed objectives also better give effect to more recent national direction to ensure this is then given effect to in subordinate regional and district planning and in consenting processes by decision-makers.	Operative Objective 16 only provides direction to maintain (rather than protect) indigenous ecosystems and habitats with significant biodiversity values. It does not address the new issues identified, provides unclear direction on how to meet obligations under section 6(c) of the RMA, and no clear direction to decision-makers on how to meet obligations to maintain indigenous biodiversity under section 30(1)(ga) and 31(1)(b)(iii) of the RMA.
Will it impose an unreasonable cost and	The amended and new objectives will impose new costs on the community because of the additional resourcing	The status quo imposes no new costs or disruption on the community. However, failure to align the RPS with anticipated

[121] https://environment.govt.nz/assets/publications/biodiversity/npisb-cabinet-paper-2010.pdf

disruption to the community?	required to fund incentives and work programmes required to give effect to the objectives through implementing policies and methods. Method CC.8 is for the regional council to provide support and seek new sources of funding (such as through innovative social good funding) for programmes to protect priority sites for their indigenous biodiversity or nature-based solutions values. The implementing policies also require some key actions anticipated through the exposure draft NPS-IB (mapping and protection of significant natural areas) to be implemented sooner which will have costs to the community. These costs are considered reasonable and in line with expectations from national direction. The reasons for taking action earlier than is proposed in the exposure draft NPSIB is explained above and assessed further in section 9 of this report. The costs to the community are considered to be reasonable given the recognised threats to indigenous biodiversity and ecosystems and, consequently, the ecosystem services they provide. These threats are recognised in the ANZBS and the exposure draft NPS-IB, as is the need for collective action from the community to address these threats. Further, the proposed objectives seek to better recognise the role of mana whenua / tangata whenua as kaitiaki and landowners as stewards of indigenous biodiversity which is expected to deliver benefits to these communities throughout the region.	national direction in the exposure draft NPSIB and address identified issues may simply result in more costs and disruption to the community in future, including the costs associated with the loss of ecosystem services if the ecosystem health of indigenous ecosystems is not maintained. It may also result in more costs to the community through the need for an additional, future change to the RPS rather than addressing key issues for indigenous biodiversity now through Plan Change 1 in a manner consistent with anticipated national direction.
Can direction be reasonably implemented?	The new direction is able to be implemented through corresponding policies and methods which spread responsibilities across Greater Wellington Regional Council, territorial authorities in the region, mana whenua / tangata whenua, landowners and community members. This ensures	The status quo can be reasonably implemented and it requires no new resourcing.

	that no group is unduly burdened and the objectives can be reasonably implemented in a collaborative manner.	
Achievability:		
Can be achieved with tools and resources available, or likely to be available, to Greater Wellington Regional Council or those implementing the RPS?	This option is achievable given Greater Wellington's powers, authorities and skills, which include statutory obligations in the RMA to protect areas of significant indigenous vegetation and significant habitat of indigenous fauna under section 6(c) and maintain indigenous biodiversity under section 30(1)(ga). Council and territorial authorities already have a range of regulatory and non-regulatory methods and initiatives underway to meet these obligations. Achieving the new and amended objectives will require additional resourcing, and partnerships with other local authorities and organisations, but this is considered realistic and achievable for local authorities in the region.	The option is achievable given Greater Wellington's powers, authorities and skills.

Natural hazards evaluation – appropriateness of objectives

Climate change and natural hazards
Amended Objective 19 The risks and consequences to people, communities, ~~their~~ business~~es~~, property, ~~and~~ infrastructure and the environment from natural hazards and the effects of climate change ~~effects~~ are ~~reduced~~ *minimised*. **Amended Objective 20** Natural hazard and *climate change mitigation and adaptation* activities minimise the risks from natural hazards and impacts on *Te Mana o te Wai, Te Rito o te Harakeke*, natural processes, indigenous ecosystems and biodiversity. ~~Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events.~~ **Amended Objective 21**

The resilience of our ~~C~~communities ~~are more resilient to natural hazards, including the impacts~~ and the natural environment to the short, medium, and long-term effects of climate change~~,~~ and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events. **New Objective CC.6** Resource management and adaptation planning increase resilience for communities and the natural environment to the short, medium, and long-term effects of climate change.
Intent of change:
Many areas affected by natural hazard in the region also have values for mana whenua / tangata whenua, indigenous biodiversity and ecosystems as they are commonly associated with water; rivers, coasts and wetlands. Subdivision, use and development in these areas places activities at risk, usually requiring hard engineered mitigation works that further degrade the life supporting capacity of the environment and interfere with natural processes. Climate change will exacerbate these risks. The amended Objective 20 and new climate change objective acknowledge the important links to social and environmental values for better integrated management of natural hazard mitigation and adaptation activities.
Other objective options:
Status quo: Retain current objective 20 without any amendment.

Other relevant objectives both proposed and operative	
Objective 3	Habitats and features in the coastal environment that have significant indigenous biodiversity values are protected; and Habitats and features in the coastal environment that have recreational, cultural, historical or landscape values that are significant are protected from inappropriate subdivision, use and development.
Objective 6	The quality of coastal waters is maintained or enhanced to a level that is suitable for the health and vitality of coastal and marine ecosystems.
Objective 7	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.
Objective 13	The region's rivers, lakes and wetlands support healthy functioning ecosystems
Objective 16	Indigenous ecosystems and habitats with significant ecosystem functions and services and/or biodiversity values are ~~maintained~~ *protected*, enhanced, and restored to a healthy functioning state.
Objective 16A	The ecosystem health, ecological integrity and ecological connectivity of the region's indigenous ecosystems, and the ecological processes that support them, are maintained and restored, indigenous biodiversity and mahinga kai is thriving and is resilient to the effects of climate change.

Objective 19	The risks and consequences to people, communities, ~~their~~ business~~es~~, property, ~~and~~ infrastructure and the environment from natural hazards and the effects of climate change ~~effects~~ are ~~reduced~~ *minimised*.	
Objective 21	The resilience of our ~~C~~communities ~~are more resilient to natural hazards, including the impacts~~ and the natural environment to the short, medium, and long-term effects of climate change~~,~~ and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.	
Objective CC.4	*Nature-based solutions* are an integral part of *climate change mitigation* and *adaptation*, improving the health and resilience of people, biodiversity, and the natural environment.	
	Preferred option – amended Objectives 19, 20 and 21 and add new Objective CC.4	Status quo – retain current Objectives 19, 20 and 21
Relevance:		
Addresses the relevant resource management issue?	Yes, recognises and allows approaches to integrate hazard risk management activities across a range of social, cultural, environmental and mana whenua / tangata whenua values that seeks to balance and reduce the adverse effects that these can have on the environment, natural processes and ecosystems.	Maintains a siloed approach to the management of natural hazards and does not recognise or provide for the many values that are impacted by hazard management activities.
Gives effect to national direction?	Gives effect to NZCPS Policy 2 – Te Tiriti, mana whenua / tangata whenua and Māori heritage; Policy 4 – Integration; Policy 11 – Indigenous Biodiversity; Policy 26 – Natural defences against coastal hazards. Recognises the integrated issues associated with natural hazards and climate change as highlighted in the National Adaptation Plan and issues traversed in the exposure draft NPS-IB.	No, does not give effect to national guidance and direction that has been released over the past 10 years since the RPS become operative in 2013.
Usefulness:		
Will provide clear direction to decision makers and territorial authorities?	Yes, the amended objectives are clear in the intent that is being signalled to provide integrated decision making for hazard risk management that incorporates a range of values in an assessment of environmental effects and seeks to ensure that natural hazard and climate change mitigation	The current objectives provide clear direction but they do not do so in an integrated way. They only provide for a narrow definition of hazard management that does not recognise the many values people have of the natural environment or the adverse impacts that hazard mitigation measures can have on

	and adaption activities do not adversely affect the natural environment.	these values; activities that are likely to increase as a result of climate change.
Will it impose an unreasonable cost and disruption to the community?	There will be additional components for Greater Wellington Regional Council and territorial authorities to consider in the development of natural hazard provisions for regional, city and district plans and for consideration in assessments of environmental effects for resource consents. This may lead to innovative climate adaptation and hazard mitigation solutions that carry higher short term costs than maintaining the status quo, but provide efficiency in long term payback in terms of greater resilience and ecosystem and climate change mitigation services.	Failure to recognise the important relationships and connections between our hazard management and adaptation activities and impacts on the natural environment will result in a larger cost and disruption to the community in the longer term as it will result in poor or maladaptation to natural hazards and climate change and increasingly expensive impacts from natural disasters and loss of biodiversity and ecosystems that have the ability to provide an important buffer from hazards and provide climate change mitigation services.
Can direction be reasonably implemented?	Yes, it will be implemented by regional and territorial authorities by incorporating into polices and rules of regional and district plans and consenting considerations that is part of the day to day work of local authorities. It may require some innovative thinking and design solutions and cooperative processes to incorporate more fully mana whenua / tangata whenua and environmental values into the planning and decision making process, but this is within the capabilities of councils and contractors.	The status quo has been partially implemented through district plan reviews and can continue to be implemented as those reviews continue.
Achievability:		
Can be achieved with tools and resources available, or likely to be available, to Greater Wellington Regional Council or those implementing the RPS?	Yes. Regional councils have powers and functions under the RMA to manage the significant risks from natural hazards. This objective allows for greater consideration and integration of the issues and objective into polices and rules of regional and district plans and consenting considerations that falls within the statutory mandate of local government.	Maintaining the status quo presents the potential that Greater Wellington Regional Council responsibilities in natural environment management may not be met, along with failure to recognise important mana whenua / tangata whenua values and Te Tiriti responsibilities.

Urban development evaluation – appropriateness of objectives

Urban development

Objective 22

Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning urban environments, which:

1. Are compact and well designed; and
2. Provide for sufficient development capacity to meet the needs of current and future generations, and
3. Improve the overall health, well-being and quality of life of the people of the region, and
4. Prioritise the protection and enhancement of the quality and quantity of freshwater; and
5. Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity, and
6. Support the transition to a low-emission and climate-resilient region, and
7. Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households, and
8. Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga, and
9. Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification, and
10. Provide for commercial and industrial development in appropriate locations, including employment close to where people live, and
11. Are well connected through multi-modal (private vehicles, public transport, walking, micro-mobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space.

Objective 22B

Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features identified in this RPS are managed effectively.

Intent of change:

To provide overarching direction to achieve well-functioning urban environments in the Wellington Region to respond to the two issues[122] identified:

1. The Wellington Region lacks sufficient, affordable and quality (including healthy) housing supply and choice to meet current demand, the needs of projected population growth and the changing needs of our diverse communities. There is a lack of variety of housing types, including papakāinga. Housing affordability has declined significantly over the last decade, causing severe financial difficulty for many lower-income households, leaving some with insufficient income to provide for their basic needs and well-being. There is a lack of supporting infrastructure to enable the development of sufficient housing and ensure quality urban environments.

[122] Minor consequential changes are also proposed for the existing issues 1 and 2.

2. Inappropriate and poorly managed urban land use and activities in the Wellington region have damaged, and continue to jeopardise, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increased the exposure of communities to the impacts of climate change and natural hazards. This has adversely affected mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.	
Other objective options:	
Status quo: Retain current Objective 22 Alternative: Only mandatory requirements of the NPS-UD in order to not conflict with intensification direction.	
Other relevant objectives both proposed and operative:	
Objective CC.1	By 2050, the Wellington Region is a low-emission and climate-resilient region, where *climate change mitigation* and *adaptation* are an integral part of: (a) sustainable air, land, freshwater, and coastal management, (b) well-functioning *urban environments* and *rural areas*, and (c) well-planned infrastructure.
Objective CC.3	To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced: (b) By 2030, to contribute to a 50 percent reduction in net greenhouse gas *emissions* from 2019 levels, including a: (i) 35 percent reduction from 2018 levels in land transport-generated greenhouse gas *emissions*, and (ii) 40 percent increase in active travel and public transport mode share from 2018 levels, and (iii) 60 percent reduction in public transport *emissions*, from 2018 levels, and (c) By 2050, to achieve net-zero *emissions*.
Objective CC.6	Resource management and adaptation planning increase the resilience of communities and the natural environment to the short, medium, and long-term effects of climate change.
Objective 20	Natural hazard and *climate change mitigation and adaptation* activities minimise the risks from natural hazards and impacts on *Te Mana o te Wai*, *Te Rito o te Harakeke*, natural processes, indigenous ecosystems and biodiversity.

Objective 21	The resilience of our ~~C~~communities ~~are more resilient to natural hazards, including the impacts~~ and the natural environment to the short, medium, and long-term effects of climate change~~,~~ and sea level rise is strengthened, and people are better prepared for the consequences of natural hazard events.
Te Mana o te Wai replacement Objective 12	Natural and physical resources of the region are managed in a way that prioritises: (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future; and Te Mana o te Wai encompasses six principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this RPS and its implementation The six principles are: (a) Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater (b) Kaitiakitanga: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations (c) Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others (d) Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future (e) Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations, and (f) Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation. And separate statements of Te Mana o te Wai expressions of Kahungunu ki Wairarapa and Rangitāne o Wairarapa.
Objective 22A	To achieve sufficient development capacity to meet expected housing demand in the short-medium and long term in any tier 1 urban environment within the Wellington Region, the housing bottom lines in Table 9a are to be met or exceeded in the short-medium and long term in the tier 1 urban environment.

	Note: Objective 22A and Table 9A are inserted into the Regional Policy Statement directly under section 55(2)(b) of the Resource Management Act 1991, i.e. without reference to RMA Schedule 1, as directed by the NPS-UD. The short-medium term (2021- 2031) and long term (2031- 2051) housing bottom lines are drawn from the Wellington Regional Housing and Business Development Capacity Assessment, Housing update – May 2022.		
	Preferred option – new Objective 22 and 22B	Status quo – retain existing Objective 22	Alternative – minimum amendments to meet mandatory NPS-UD requirements
Relevance:			
Addresses the relevant resource management issue?	Objective 22 adopts the concept of well-functioning urban environment that is introduced through Policy 1 of the NPS-UD and directs to provide for the qualities and characteristics which are specifically listed. Included in these qualities and characteristics are those identified in Policy 1 of the NPS-UD, including housing supply and a variety of housing, along with integration with other key direction of the RPS. Specifically, clauses (d) and (e) reference freshwater (NPS-FM direction) and other values and features identified through the RPS. Alignment is also provided within climate change direction through clause (f). Objective 22B is a consequential addition through the changes to Objective 22 and reflects the status quo direction which has not been identified as an issue in this plan change.	Does not address either of the resource management issues.	Partially addresses issue 1 through enabling intensification that aligns with the NPS-UD. Does not address issue 2.
Gives effect to national direction?	Objective 22 reflects the NPS-UD direction for enabling sufficient development capacity and to provide for the qualities and characteristics of well-functioning urban environments. The	Current objective is not consistent with NPS-UD as it does not provide for development capacity and requires further urban	Would partially give effect to the NPS-UD in that it reflects the minimum requirements as directed in the NPS-UD. However, it does not

	objective also provides for other aspects of the NPS-UD such as intensification and responsive planning. Clauses (d) aligns with the NPS-FM direction to protect significant freshwater values and to give effect to Te Mana o Te Wai. Clause (e) and (f) also aligns with the New Zealand Coastal Policy Statement direction as it relates to urban development within the Coastal Environment.	development to be in accordance with the 2007 Wellington Regional Strategy. It does not provide for the level of intensification required nor enable non-contiguous growth. The current objective also does not provide for any environmental integration for giving effect to the NPS-FM and NZCPS.	give effect to all directions in the NPS-UD, such as the nature and level of intensification and responsive planning.
Usefulness:			
Will provide clear direction to decision makers and territorial authorities?	The adoption of the same terminology as the NPS-UD ensures that decision makers have clear articulation from national direction down to regional. The direction sets out clear outcomes that account for both the existing and new resource management issues.	The current objectives do not fully align with or reflect the language in the NPS-UD which could create uncertainty between national and regional policy direction. In addition, the current objective does not provide sufficient clarity on what is to be achieved.	By undertaking the minimal changes contained in the NPS-UD, it is likely that the direction would be inconsistent with other existing RPS direction, thereby reducing their usefulness.
Reasonableness:			
Will it impose an unreasonable cost and disruption to the community?	As the objective is replaced in its entirety, there will be some additional cost in implementing the direction through district plan reviews. The direction also provides for a stronger link to management of the biophysical environment through clause (d) and (f) which will impose a higher financial cost for developers in achieving high quality environmental outcomes. This cost is not considered unreasonable and is outweighed by the benefits that come in relation to environmental, social and cultural values.	The financial cost would remain low. This option would also be familiar to plan users and not require specific revision of district plans to give effect to it. The social, cultural and environmental cost would remain high through the direction ineffectively providing for development capacity, well-functioning urban environments and not addressing the identified resource management issue.	Minimal changes would result in low cost to the community for implementing and little disruption. The social, cultural and environmental cost would potentially be high through the direction ineffectively providing for development capacity and well-functioning urban environments and not addressing the identified resource management issue.

Can direction be reasonably implemented?	The primary intent of this change is to give effect to the NPS-UD which has been in effect since August 2020. The direction therefore does not introduce new concepts or requirements. In particular, the term "well-functioning urban environments" is derived from Policy 1 of the NPS-UD and is a well understood term. Direction can be reasonably implemented.	As direction is not consistent with national direction, this cannot be reasonably implemented.	Minimal changes would be required to effectively implement policies and methods to achieve these objectives and would be consistent with NPS-UD requirements.
Achievability:			
Can be achieved with tools and resources available, or likely to be available, to Greater Wellington Regional Council or those implementing the RPS?	This option is achievable using Greater Wellington Regional Council powers, authorities and skills, in collaboration with territorial authorities implementing the RPS.	Option does not require any specific action by Greater Wellington Regional Council. However, would result in not fully giving effect to higher order direction, in particular the NPS-UD.	This option is achievable using Greater Wellington Regional Council powers, authorities and skills, in collaboration with territorial authorities implementing the RPS.

Regionally significant infrastructure evaluation – appropriateness of objectives

Amendments to the definition of regionally significant infrastructure (RSI)
Objective/purpose of this change: The purpose of this set of changes is to amend the relevant definition in the RPS to achieve consistency with the RMA and NRP (following appeals) and achieve the purpose of the policies relying on this definition.
Intent:
The regional policy statement includes a definition of regionally significant infrastructure, which defines specific infrastructure providers in the Wellington Region that provide a regional level benefit. The definition of RSI is linked to RPS Policies 7 and 8. During development of the Proposed Natural Resources Plan (PNRP) the definition of RSI was adopted from the RPS for provisions on beneficial use and development (for defining regionally significant infrastructure providers). During the PNRP process, issues were raised by providers of telecommunications and radiocommunications infrastructure with the definition as to the meaning of 'strategic' in those two clauses. During the Plan and Appeals process substantive amendments were made to the PNRP definition of RSI including adding identified local arterial roads and three regionally significant landfills as well as minor amendments to clarify the scope of pipeline, transport, port

and electricity distribution RSI. However, the definition for telecommunications and radiocommunications was not amended during the Plan and Appeals process, as there were no appeals seeking an amendment to the telecommunications and radiocommunications aspect of the definition. There are two components to this proposal – firstly to change the definition of telecommunication and radiocommunication facilities to remove uncertainty with the use of 'strategic', and secondly to incorporate changes made to the definition of RSI as part of the Plan and Appeals process for the PNRP into the definition of RSI in the RPS. The definition of 'Strategic Transport Network' is included as this definition relates to the changes made for RSI for transport as part of the Plan and Appeals process on the PNRP.			
Options:			
Options are 1. Preferred: Amend definition as per PNRP plus amend the definition of telecommunications and radiocommunications facilities within the definition. 2. Status quo: no change to RPS 3. Alternative: Amend definition as per PNRP definition			
Other relevant objectives both proposed and operative:			
N/A			
	Preferred option - amendment of the definition of telecommunications and radiocommunications, along with other amendments as per PNRP	Status quo - no change in the operative version of the RPS definition	Alternative – amend as per PNRP amendments only
Relevance:			
Addresses the relevant resource management issue?	The preferred option addresses the uncertainty through removing the undefined reference to strategic facilities while still referencing activities of the telecom and radiocom networks to the respective Acts and therefore ensuring connectedness with the Acts.	The status quo is relevant as the operative definition provides information or direction to RSI activities.	This option is relevant to the proposal to improve consistency in the definition of RSI across both the RPS and the PNRP.
Gives effect to national direction?	The telecommunications definition has been adopted from National Policy Statement on Urban Development (NPS-UD), from the definition of 'additional infrastructure (page 5, NPS-UD)	Partially. The status quo is an updated definition of RSI, whilst sub-clauses may give effect to higher order documents, sub-clauses are not explicit to higher order documents.	Partially. The proposal is an updated definition of RSI, whilst sub-clauses may give effect to higher order documents, sub-clauses are not explicit to higher order documents.
Usefulness:			

Will provide clear direction to decision makers and territorial authorities?	The proposal usefully provides clarity and certainty to decision makers and territorial authorities on the correct definition of RSI including telecommunication and radiocommunications.	It us not useful to retain the definition of RSI in the RPS which is in effect out of date with the decisions and appeals made on the PNRP. Remaining with the status quo will mean difficulties in giving effect to the RPS for decision makers and territorial authorities, an uncertainty /inconsistency for regional resource consent applications requiring assessment under the RPS and PNRP.	It is considered useful to maintain consistency between the RPS and the PNRP where the information is the same and the outcomes are similar for meeting plan objectives. It is a logical next step to include the amendments made for RSI during a related Schedule 1 process.
Reasonableness:			
Will it impose an unreasonable cost and disruption to the community?	It is preferable to use a definition that is clear and certain than one that is not. This option is reasonable and allows plan users to determine more easily what is RSI. As the definition is largely the result of a comprehensive PNRP process, it is a fair conclusion that any cost and disruption is deemed acceptable, or more likely is resolved in the amendment of the definition.	To not include the new parts of the definition is not a reasonable outcome for plan users and decision makers. The amendments made in the PNRP will create ambiguity and uncertainty for decisions that are required for RSI and will likely result in similar submissions and appeals to those received on the PNRP. It is not reasonable to rely on the notified version of the definition, because of the difficulty interpreting what strategic means in the context of these telecom and radiocom infrastructure providers.	It is reasonable to accept that the decisions made in the Appeals process on the PNRP should be passed up to the operative version of the same definition in the RPS. This alignment between the two documents means that decisions concerning RSI are consistent
Can direction be reasonably implemented?	Yes, the proposed option can be reasonably implemented as part of the RPS.	Currently implemented.	Yes.
Achievability:			
Can be achieved with tools and resources available, or	The preferred option is achievable.	There is no impediment to the achievability of the status quo, but the	This option is achievable.

likely to be available, to Greater Wellington Regional Council or those implementing the RPS?		definition would remain problematic to RPS and plan users.	

9.0 EVALUATION OF EFFICIENCY AND EFFECTIVENESS OF THE PROPOSED POLICIES AND METHODS TO ACHIEVE OBJECTIVES

Integrated management evaluation – efficiency and effectiveness of provisions

This policy package is to achieve the objective: New Objective A Integrated Management
It is not one specific policy package that will achieve the New Objective A. Many existing policies in the RPS, and new and amended policies through Change 1 will contribute towards achieving this objective. The integration and how the provisions across the RPS work together will collectively contribute to achieving the New Objective A. However, there is a suite of new policies that specifically address the ineffectiveness of the non-regulatory approach to the integrated management of natural resources. They provide greater clarity of what is considered the key components of integrated management in our region, and what it is required to achieve that. The new provisions also enhance the holistic approach providing Te Ao Māori and Mātauranga Māori with the appropriate and respectful place in resource management and decision making.
Intent of this policy package: The intent of this policy package is to provide clear direction to the Regional Council and Territorial Authorities on what is required to achieve the integrated management of natural resources in the Wellington Region.
Policy package Option 1 – Preferred option New policies are proposed to: (a) Provide greater clarity and direction on what integrated management is (b) Ensure that the Regional Council and Territorial Authorities are partnering with mana whenua / tangata whenua, as well as providing support to mana whenua / tangata whenua to be adequately and appropriately involved in resource management and decision making (c) Give Te Ao Māori and Mātauranga Māori the appropriate and respectful place in resource management and decision making (d) Protect Mātauranga Māori from inappropriate use and treatment (e) Enable a more efficient, connected and holistic approach to resource management that looks beyond organisational or administrative boundaries (f) Provide greater and more efficient cooperation between organisations with shared or overlapping jurisdiction or responsibility for management of resource or issues (g) Ensure equity and inclusiveness in resource management and decision making.

Policy IM.1: Integrated management - ki uta ki tai – consideration

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be given to:

(a) partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua involvement in resource management and decision making; and

(b) recognising the interconnectedness between air, freshwater, land, coastal marine areas, ecosystems and all living things – ki uta ki tai; and

(c) recognising the interrelationship between natural resources and the built environments; and

(d) making decisions based on the best available information, improvements in technology and science, and mātauranga Māori; and

(e) upholding Māori data sovereignty; and

(f) requiring Māori data and mātauranga Māori to be interpreted within Te Ao Māori; and

(g) recognising that the impacts of activities may extend beyond immediate and directly adjacent area, and beyond organisational or administrative boundaries.

Method IM.1: Integrated management - ki uta ki tai

To achieve integrated management of natural resources, the Wellington Regional Council, district and city councils shall:

(a) partner with and provide support to mana whenua / tangata whenua to provide for their involvement in resource management and decision making; and

(b) partner with and provide support to mana whenua / tangata whenua to include and apply mātauranga Māori in natural resource management and decision making; and

(c) work together with other agencies to ensure consistent implementation of the objectives, policies and methods of this RPS; and

(d) enable connected and holistic approach to resource management that looks beyond organisational or administrative boundaries; and

(e) recognise that the impacts of activities extend beyond immediate and directly adjacent area; and

(f) require Māori data, including mātauranga Māori, sites of significance, wāhi tapu, wāhi tūpuna are only shared in accordance with agreed tikanga and kawa Māori; and

(g) share data and information (other than in (f) above) across all relevant agencies; and

(h) incentivise opportunities and programmes that achieve multiple objectives and benefits.

Implementation: Wellington Regional Council and city and district councils*

Method IM.2 Protection and interpretation of Mātauranga Māori and Māori data

By 2025, the Wellington Regional Council in partnership with each mana whenua / tangata whenua will develop and uphold tikanga and kawa for Māori data sovereignty, including but not limited to:

(a) how Māori data and information is collected, stored, protected, shared and managed; and

(b) how mātauranga Māori and other forms of Māori data is analysed and interpreted.

Implementation: Wellington Regional Council

New Policy IM.2 Equity and inclusiveness – consideration

When considering an application for a notified resource consent, notice of requirement, or a change, variation or review of a regional and district plan particular regard shall be given to achieving the objectives and policy outcomes of this RPS in an equitable and inclusive way, by:

(a) avoiding compounding historic grievances with iwi/Māori; and

(b) not exacerbating existing inequities, in particular but not limited to, access to public transport, amenities and housing; and

(c) not exacerbating environmental issues; and

(d) not increasing the burden on future generations.

Policy package option 2:

The second option is Status Quo - the existing RPS provisions.

Existing RPS provisions relating to integrated management:

(a) Policy 64: Supporting a whole of catchment approach – non- regulatory
Take a whole of catchment approach that recognises the inter-relationship between land and water, and support environmental enhancement initiatives to restore and enhance:

- coastal features, ecosystems and habitats;
- aquatic ecosystems and habitats; and

- indigenous ecosystems and habitats

(b) Methods 26-47 set out actions that will be taken by Wellington Regional Council and other organisations to manage resources in an integrated way. These methods are needed to ensure that where resources are managed by more than one agency, it is done collaboratively

(c) Method 29: Take a whole of catchment approach to works, operations and services. Take a whole of catchment approach that recognises the inter-relationships between the values of natural resources when undertaking and planning works, operations and services. Implementation: Wellington Regional Council* and city and district councils.

	Option 1 (Preferred) – new policy package	Option 2 (Status quo)
Costs:		
Environmental	Nil identified. Environmental benefit described below.	High – The provisions in this RPS have been in place since the RPS became operative. While Option 2 does include provisions relating to integrated management, a lack of clear objective and specific polices with specific direction of what it means for implementing integrated management, as well as what is required, have contributed to ongoing environmental degradation[123].
Social	Nil identified – benefits described below.	Low – The social costs of this option are expected to be low and slow.
Economic	Medium – the economic costs of these provisions in the short term will fall on the councils predominantly for resourcing any additional processes required to implement those polices, and also for resourcing and supporting mana whenua / tangata whenua to exercise their role in natural resource management and decision making. However, mid to long term the economic cost will be low by achieving greater efficiencies across organisations with shared or overlapping jurisdiction or responsibility for management of resource or issues. No specific effect on economic growth or employment have been identified.	Nil – There would be no change from the current situation.
Cultural	Low – Dependant on the form and extent to which mana whenua / tangata whenua wish to be involved, there may be	High – negative impacts on cultural identity through ineffective natural resource management and exclusion of mana whenua /

[123] Refer to Section 3.0 on page 15 where the integrated management issue is described and documents and data referenced.

	additional resourcing required for mana whenua / tangata whenua.	tangata whenua from natural resource management and decision making. Not providing for realisation of Te Tiriti o Waitangi have further compounded environmental grievances and excluded mana whenua / tangata whenua from an active role in natural resource management and decision making.
Benefits:		
Environmental	High – Option 1 is expected to provide significant benefits to the environment. Managing natural resources in the integrated way, enabling mana whenua / tangata whenua to exercise their right in managing natural resources and decision making, recognition of Te Ao Māori and Mātauranga Māori as integral components of natural resource management will significantly strengthen the holistic and integrated nature of the environment and people.	Low – Option 2 maintains the existing direction of the RPS and environmental benefits of this option are expected to be low. Even with best efforts to implement integrated management we have failed to realise its potential due to lack of clear direction and objectives that describe how the successful integrated management for our regions looks like. Poor and inconsistent inclusion of mana whenua / tangata whenua in natural resource management and decision making have exacerbated the environmental grievances as well as historical grievances.
Social	High – the social benefits of Option 1 are expected to be high, as this option puts at the forefront the considerations that will result in more, equitable and inclusive natural resource management. The benefit will come from a policy requiring an active regard to interconnections between the natural environment and built environment, and active assessment of any existing or potential inequities within or between communities from a decisions. This will benefit communities that may have been historically subject to unfavourable decisions on matters such as public transport access, housing options, or amenity values.	Low. This option is expected to maintain the current direction which provides for some consideration of integrated management, but limited direction so only generating low outcomes for matters such as equity between communities (such as amenity outcomes and housing access), and limited implementation across organisations and administrative boundaries.
Economic	Low to medium – Option 1 in the short term is not likely to yield any noticeable economic benefits. However, in the medium term it is likely to see benefits of the efficiencies gained through cooperation across organisations with shared or overlapping jurisdiction or responsibility for management of environmental	Low – Option 2 maintains the status quo hence the economic benefits are anticipated to be low.

	or resource management issues. An economic benefit may also come from more holistic and connected natural resources management. For example, the costs will lie more equitably with those adversely impacting natural resources, rather than with the wider community or sections of the community. No specific effect on economic growth or employment have been identified, although there may be additional employment to support iwi authority resourcing.	
Cultural	High – clear direction in mana whenua / tangata whenua and natural resource management and decision making, as well as providing support to mana whenua / tangata whenua to be adequality and appropriately involved is a step towards realisation of Te Tiriti o Waitangi obligations. Giving Te Ao Māori and Mātauranga Māori appropriate and respectful place in resource management and decision making provides mana whenua / tangata whenua with ability to express and exercise their traditional knowledge and methodologies as part of the wider natural resource management system.	Low – Option 2 does not provide for mana whenua / tangata whenua to adequately exercise their traditional knowledge and methodologies, nor has it provided opportunities for their active participation in natural resource management and decision making.
Effectiveness:		
How successful will you be in providing the outcome set by the objective?	Option 1 – Greater Wellington Regional Council has resources and systems in place to implement Option 1. Integrated management is a core function of the Council. The option is aligned to NRP provisions including Policy P1: Ki uta ki tai and integrated catchment management already in the RPS, as well as reflecting requirements of NPS-FM, hence providing an effective combined approach to achieving the objective. Greater Wellington Regional Council has existing partnerships with mana whenua / tangata whenua to form a base to continue to support and grow this partnering in resource management approach and decisions. Measuring the effectiveness of the objective and policies will, at least initially,	Option 2 maintains the current status quo which has proven to be insufficient and ineffective in achieving the holistic integrated natural resource management that enables mana whenua / tangata whenua to actively participate in natural resource management and decision making failing to meet Te Tiriti o Waitangi obligations.

	be focused on the processes (partnering, cross-organisation, how Te Ao Māori and Mātauranga Māori are applied) and how considerations across natural resources and communities are part of decision-making. It is acknowledged that environmental, social and cultural outcomes may not be easily linked specifically to this policy package.	
Efficiency:		
Will the option contribute to achieving the objective at the lowest total cost or highest net benefit to all members of society?	Yes, Option 1 will achieve a low cost to society and will result in more fair, equitable and inclusive natural resource management. It will result in a high net benefit to society, since it appropriately provides for fair, equitable and inclusive natural resource management, meeting Te Tiriti obligations.	No, Option 2 will not be successful in achieving Objective A, and would result in increasing net cost to society, since it does not avert the significant adverse effect that can be somewhat mitigated by more holistic, connected and inclusive resource management.
Risks of acting or not acting if there is uncertain or insufficient information:	N/A – there is sufficient information available to progress Option 1. The scope to improve integration is documented[124] and mana whenua / tangata whenua support Te Ao Māori and Mātauranga Māori having a stronger and respectful place in resource management and decision making. There is a risk of uncertainty in measuring outcomes specific to this policy package, however ongoing partnering and management of processes will support this.	
Overall evaluation	Overall, Option 1 is recommended as it provides greater direction in how to better realise integrated management of natural resources. It supports a more equitable and inclusive approach to decision making and considerations in natural resource management. It also gives greater direction for councils to enable mana whenua / tangata whenua to exercise their role and actively participate in natural resource management and decision making. Retaining Status Quo is not a viable option since it has not resulted in the holistic natural resource management required. The whaitua processes and the respective Whaitua Implementation Programmes have highlighted inadequacies in Greater Wellington Regional Council's current implementation of integrated resource management under the status quo arrangement.	

Climate change – efficiency and effectiveness of provisions

The proposed policies and methods to achieve the climate change objectives are evaluated in tables below with assessment focused on the following packages of proposed provisions:

(c) Reducing greenhouse gas emissions from transport
(d) Reducing greenhouse gas emissions from agriculture

[124] Refer Section 3.0.

(e) Reducing greenhouse gas emissions from biogenic organic waste
(f) Reducing greenhouse gas emissions from energy
(g) Reducing greenhouse gas emissions from industrial processes
(h) Nature based solutions – carbon sinks
(i) Natural hazards and adaptation – resilience

It is intended that the policy packages work together to contribute to achieving new Objective CC.3.

Climate change and transport – Reducing greenhouse gas emissions

This policy package is part of a suite that contribute to achieving new Objective CC.3 To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced: 1. By 2030, to contribute to a 50 percent reduction in net greenhouse gas *emissions* from 2019 levels, including a: (a) 35 percent reduction from 2018 levels in land transport-generated greenhouse gas *emissions*, and (b) 40 percent increase in active travel and public transport mode share from 2018 levels, and (c) 60 percent reduction in public transport *emissions*, from 2018 levels, and 2. By 2050, to achieve net-zero *emissions*.
Intent of this policy package: The intent of this policy package is to decarbonise the transport system, promote mode shift from private vehicle use to active and public transport, and provide for low or zero carbon transport services prior to development occurring.
Policy package option 1 - preferred: New and amended policies are proposed to: • Optimise transport demand, maximise mode shift to active and public transport, and reduce carbon emissions. • Recognise the benefits of regionally significant infrastructure, in particular low and zero carbon regionally significant infrastructure. • Require Travel Demand Management Plans in certain circumstances to minimise private vehicle use and maximise active and public transport. • Require District Plans to include provisions enabling infrastructure that supports uptake of zero and low-carbon transport. • Integrating land use and transport by supporting a safe, reliable, inclusive and efficient transport network and to give effect to NPS-UD direction

- In the consideration of applications:
  - consider the benefits of energy from renewable sources and regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions.
  - Consider whether the proposal minimises overall transport demand, maximises mode shift, by reducing emissions and increasing active and public transport
  - For freight activities, consider proximity to efficient transport networks to minimise emissions.
  - A whole of life carbon emissions assessment is encouraged for infrastructure.
  - the importance of reducing gross greenhouse gas emissions as the first priority, rather than applying offsetting
  - Ensure land use and transport planning within Wellington Region is integrated.
  - Ensure development is sequenced so multi modal, and low or zero carbon transport serving a given area is provided.

1. With regard to the Regional Land Transport Plan, amend to:
   - Include provisions to reduce emission of greenhouse gass and other harmful emissions.
   - Include provisions that promote affordable and accessible active mode and car share infrastructure and public transport services.
   - Include provisions that support well-functioning urban environments and a reduction in emissions.

Policy package option 2 – status quo with minimum NPS-UD requirements:

The second option is to retain the existing RPS provisions, as well as implementing the minimum requirements of the NPS-UD.

Existing RPS provisions relating to transport and climate change:

- Policy 9: The Wellington Regional Land Transport Strategy shall include objectives and policies that promote a reduction in:
  (a) the consumption of non-renewable transport fuels; and
  (b) the emission of carbon dioxide from transportation
- Policy 33: The Wellington Regional Land Transport Strategy shall contain objectives and policies that support the maintenance and enhancement of a compact, well designed and sustainable regional form.
- Policy 31: District plans shall:
  (a) identify key centres suitable for higher density and/or mixed use development; identify locations, with good access to the strategic public transport network, suitable for higher density and/or mixed use development; and
  (b) include policies, rules and/or methods that encourage higher density and/or mixed use development in and around these centres and locations, so as to maintain and enhance a compact, well designed and sustainable regional form.
- Policy 57: When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy:

(a) whether traffic generated by the proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network;
(b) connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity, open spaces or recreational areas;
(c) whether there is good access to the strategic public transport network;
(d) provision of safe and attractive environments for walking and cycling; and
(e) whether new, or upgrades to existing, transport network infrastructure have been appropriately recognised and provided for.

- Policy 58: When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, particular regard shall be given to whether the proposed subdivision, use or development is located and sequenced to:
  (a) make efficient and safe use of existing infrastructure capacity; and/or
  (b) co-ordinate with the development and operation of new infrastructure.

Minimum requirements of the NPS-UD:

- Relevantly, the NPS-UD requires tier 1 territorial authorities to identify, by location, the building heights and densities required by Policy 3 of the NPS-UD.
- Policy 3 of the NPS-UD:

In relation to tier 1 urban environments, regional policy statements and district plans enable:

in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and

in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and

building heights of at least 6 storeys within at least a walkable catchment of the following:

(i) existing and planned rapid transit stops

(ii) the edge of city centre zones

(iii) the edge of metropolitan centre zones; and

within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.

Policy package option 3 – alternative option with additional measures:

The third option is to implement Option 1 (proposed new and amended policies) plus the following additions:

• Method to develop more ambitious regional transport emission reduction targets (including a target for reducing the proportion of internal combustion engines) with robust data to support the targets. • Regulatory policies that direct which areas in the region are suitable for urban development to occur, to ensure that new development offers public, active and multimodal low carbon and efficient transport options. • Regulatory policies to direct urban design to remove dependence on private vehicles (for example related to vehicle kilometres travelled). • Method to invest in transforming and decarbonising urban design to eliminate dependence on private vehicles.			
	Option 1 (Preferred)	Option 2 (Status quo including NPS-UD)	Option 3 (Alternative with additional measures)
Costs:			
Environmental	Low – Option 1 provides a suite of policies that will guide a transition to lower transport emissions. While there will still be environmental cost of emissions, they are low compared to the existing environmental costs of the current transport system.	Medium – While Option 2 does include policies that will gradually reduce transport emissions over time, these policies are not directive and will not transform the emissions of the transport system.	Low – Option 3 is more directive than Option 1 in that it specifically targets the dependence on private vehicles, and proposes to direct suitable areas for urban development more forcefully. These measures are expected to reduce emissions at a greater rate and therefore environmental costs are low.
Social	Medium – The policies of Option 1 are expected to result in changes to travel patterns and modes in the Wellington Region over time. These changes are expected to generate medium costs for some individuals in the short to medium-term as they adjust to new forms of travel including the cost of some independence and inconvenience due to variable availability of public transport. In the longer term, with better transport options, costs would reduce.	Low for transport options – Option 2 would result in a more gradual shift to low or zero emission forms of transport. The social costs of this option are expected to be low. High for health impacts – Option 2 would not address the high social costs resulting from anthropogenic health impacts of $PM_{2.5}$ and NO2 pollution. The costs of NO2 pollution from anthropogenic sources in New Zealand in 2016 ($9.5 billion) were assumed to result from motor vehicles alone while the costs of $PM_{2.5}$pollution from anthropogenic sources in New Zealand in 2016 ($6.1	Medium – Option 3 directs the removal/elimination of the dependence on private vehicles. This would result in higher social costs (in terms of access to opportunities and household transportation costs) as public and active transport systems are not sufficiently extensive, regular, interconnected and affordable enough in some parts of the region to act an effective replacement for car travel. As investment in public and active transport increases over time, the social costs of this option would reduce. The flow on costs of infrastructure/land development meeting targets more

		billion) was partly associated with motor vehicles (17%). In the Wellington Region, 85% of all anthropogenic health costs were contributed by motor vehicles and 30% by domestic fires. The air pollution health burden due to anthropogenic sources increased by 10.2% between 2006 and 2016[125]	quickly would also flow on to communities in forms and affordability of travel.
Economic	Medium-Low – the economic costs of changing to low and zero carbon transport and infrastructure could be in higher costs for project development with costs falling on the developers of infrastructure and new urban development. However, there is some evidence that low emission infrastructure can have lower whole of life costs in the long term. Actual or perceived costs for infrastructure could have flow on effects on the broader economy and the government's tax-base as these costs are passed on, or potential reduction in economic growth and employment as some developers elect not to progress those projects which have a significant transport infrastructure component.	Medium - Low –Option 2 is less directive and slower in managing the transition to a low or zero carbon transport system, largely following anticipated changes over time. The economic costs are therefore expected to be low. Ongoing increases (at worst) or volatility (at best) of fuel prices will result in higher costs on individuals and businesses if the status quo reliance on traditional hydrocarbon fuels continues.	Medium - High – the costs of Option 3 are similar to Option 1, with the addition that the directive nature of the provisions will pick winners and losers in land markets, depending on whether owners are located in areas marked for urban development. There will therefore be areas of higher economic cost. The costs exist to some extent already as the WRGF seeks to achieve good access to rapid transit or high frequency public transport to all future urban/greenfield development areas, however this option would increase those costs through the directive regulation of Option 3.
Cultural	Medium - Ministry of Transport research into transport emissions pathways has identified that Māori tend to experience more transport inequities than other New Zealanders because they have lower	Medium – since Option 2 generally maintains the status quo and results in a slower transition to low or zero emissions from transport, this will allow some Māori more time to adjust to changes	High – the directive nature of Option 3 means that some Māori communities may feel forced to change their way of life. This is likely to result in high cultural costs, at least in some areas.

[125] Health and Pollution in NZ (HAPINZ) report, July 2022 - Health and air pollution in New Zealand 2016 (HAPINZ 3.0): Findings and implications | Ministry for the Environment

	incomes on average. They are also more likely to have an impairment at younger ages than other ethnicities. Many Māori people live and work in areas that are not well served by public transport.[126] These are just some of the reasons that Māori are likely to experience a medium cost as a result of transitioning to a zero or low emissions transport system, since they will need to adjust to alternative transport modes and technologies, or live in higher density environments.	that occur at a slower pace having lower cost, however for some Māori the continued transport inequities (refer Option 1) will also result in ongoing costs.	
Benefits:			
Environmental	High – Option 1 will direct a timely transition (than the status quo) to a low and zero carbon transport system, and therefore will provide high environmental benefits. In the Wellington Region, the main source of greenhouse gas emissions is transport (39% total load in 2018-19). This RPS option would focus on this key area where reductions can have best regional benefit. This option, and its benefits, aligns with the ERP and assumed update of EVs, and building on that expectation to support the transition. Indirect environmental benefits may result, for example improved air, stormwater and soil quality from changes in travel modes.	Low – Option 2 generally maintains the existing direction of the RPS, which has not resulted in strong reductions in transport emissions in the past. Therefore, environmental benefits of this option are expected to be low.	High – Option 3 provides all the benefits of Option 1 while taking further steps to eliminate the dependence on private vehicles, and more forcefully directing areas for and design of suitable urban development. Environment benefits are therefore expected to be high. Extreme weather events and sea level rise are already impacting our region, including on natural hazards, biodiversity, and water quality and availability. In the Wellington Region, the main sources of greenhouse gas emissions are transport (39% total load in 2018-19), agriculture (34%), and stationary energy (18%). This RPS option would focus on these key

[126] https://www.transport.govt.nz/assets/Uploads/Discussion/Transport-EmissionsHikinateKohuparaDiscussionDoc.pdf

			areas where reductions can have best regional benefit.
Social	High – the social benefits of Option 1 are expected to be high, as this option will support significantly higher quality urban environments for current and future residents, with good mode choice and improved access to facilities. The provisions would result in an indirect social benefit through improved air quality due to reduced traffic related air pollution. This health benefit would particularly benefit people living near, or working near, busy roads. Traffic-related air pollution is estimated to cost our region $846.5 million per year in social costs. Social costs are the total costs to society of health effects associated with air pollution, not just the direct medical costs but also the wider costs due to loss of output (income and time off work or school for those who need to care for affected family and friends) and recovery. Across the region, exposure to traffic-related air pollution at place of residence was estimated for adults to result in 182 premature deaths per year, 744 hospital admissions and 1,183 cases of childhood asthma. [127] These benefits are however, reliant on an equitable transition to a low emissions	Low – Option 2 does not transform the nature of the transport system or the character of the built environment. Therefore, this option is expected to maintain the current trajectory of emissions reduction and urban intensification, only generating low social benefits.	High – the social benefits of Option 3 are expected to be high, as this option will result in significantly higher quality urban environments for current and future residents, with excellent mode choice and improved access to facilities. Health benefits would be higher than Option 1, and particularly benefit people living near, or working near, busy roads. These benefits are however, reliant on an equitable transition to a low emissions transport system being achieved. Some parts of society will continue to experience barriers to multi-modal, low or zero emission transport systems, exacerbating poor outcomes for existing marginalised communities. A just transition is therefore critical, which as per Option 1, Policy CC.9 is proposed for the RPS to provide for equity and inclusiveness. In addition, a caveat to the high social benefits is that there will be a portion of society that would prefer to achieve reductions in transport emissions by other methods, e.g by rapidly adopting low-emissions vehicles in line with the ERP. Option 3 has the additional social

[127] HAPINZ 2022 report.

	transport system being achieved. Policy IM.2 (Equity and inclusiveness – consideration) is proposed for the RPS to acknowledge this caveat, requiring that the consideration of applications shall give particular regard to equity and inclusiveness. In line with the ERP, Option 2 relies partially on rapid private adoption of low emission vehicles to achieve the emissions reductions required from the transport sector. This in turn relies on increased renewable electricity provision from the National Grid, or within the region; tying in with proposed amendments to renewable energy provisions of the RPS. This option will also support implementation of the NPS-UD in the form of urban development.		benefits from Option 3 of resolve greater adverse social impacts of car dependency e.g. health impacts from sedentary lifestyles and traffic accidents, social isolation and mental health impacts[128], as well as economic inefficiency impacts of congestion[129]. This option would however require the greatest change in transport behaviours from the community.
Economic	Medium – Option 1 will support the provision of low or zero carbon infrastructure in the Wellington Region. Some low carbon infrastructure can be constructed at a lower cost (e.g. active travel mode infrastructure) than regular carbon intensive infrastructure, (e.g. roading). Some urban development costs may be higher, however the proposals may also encourage savings by promoting more	Medium – Option 2 maintains the status quo from an infrastructure delivery perspective, with some additional intensification around centres. Since this infrastructure delivery approach remains carbon intensive the economic benefits are anticipated to be moderate.	Medium– Option 3 will provide low or zero carbon infrastructure in the Wellington Region. Some low carbon transport infrastructure will be constructed at a lower cost than regular carbon intensive infrastructure (e.g roading). Urban development costs may be higher, however the proposals may also encourage savings by promoting more efficient uses of land. The option

[128] Public Health Advisory Committee research (Healthy Places, Healthy Lives: Urban environments and wellbeing).
[129] The estimated that the cost of road congestion Wellington City was $680,000 on a typical weekday in 2016 - Estimates of costs of road congestion in Wellington.

	efficient uses of land. The option may provide limited benefits when viewed purely from a short-term economic perspective. However, in the longer-term, low or zero carbon infrastructure will result in more connected communities, lower individual travel costs and better access to jobs and services. This is not expected to increase employment opportunities but would contribute to more efficient travel for employment and possibly provide a wider employment pool for some employers. This more sustainable model of infrastructure delivery and use is expected to reduce the long-term economic costs of the transport system, potentially increase economic growth, and result in medium economic benefits overall. The option will also provide good information based on whole of life carbon emissions in transport infrastructure, benefitting the regional strategy with sound data. A focus on transport is a provides the highest potential benefit for emissions improvements as transport is the highest emissions source, and also opportunity for gathering the data base for future consideration in other sectors.		may provide limited benefits when viewed purely from a short-term economic perspective. However, in the longer-term, low or zero carbon infrastructure will result in more connected communities, lower individual travel costs and better access to jobs and services. This more sustainable model of infrastructure delivery and use is expected to reduce the long-term economic costs of the transport system, resulting in medium economic benefits overall.
Cultural	High - A shift to low carbon transport modes will help to reduce air and noise	Low – The slow transition to a low or zero emission transport system will result in	Medium – The directive nature of Option 3 means the benefits outlined in Option 1

	pollutants, and encourage more active travel. This will deliver better health outcomes, including for Māori. Electric Vehicles, in comparison to Internal Combustion Engine (ICE) vehicles, are cheaper to operate. They have lower maintenance requirements. Charging costs are also more stable and predictable than petrol costs, as retail electricity prices in Aotearoa tend to change slowly over time. Aotearoa also has an abundance of renewable energy sources to generate more electricity as demand increases. In the long-term, the shift from ICE vehicles to electric vehicles will therefore lead to lower and more stable transport costs for most households and communities, including Māori. It is usually not viable to provide frequent public transport services in rural areas due to the low population densities. It can also be difficult for people to walk or bike to places for work, healthcare, education, amenities, and places of cultural importance due to the long travel distances involved [130]. The large-scale adoption of electric vehicles across society (including by Māori) can overcome the issue of high transport emissions in rural and low-density environments.	similar benefits to those of Option 1, but at a much slower pace. Therefore, the cultural benefits of this option are low.	will be realised more rapidly, resulting in high cultural benefits. However, as outlined under the cultural costs above, the directive nature of Option 3 means that some Māori communities may feel forced to change their way of life more rapidly than they are comfortable with. Therefore, on balance, the cultural benefits of Option 3 are considered to be medium.

[130] https://www.transport.govt.nz/assets/Uploads/Discussion/Transport-EmissionsHikinateKohuparaDiscussionDoc.pdf

	In addition to the cost savings outlined above, the transition of the transport sector to low or zero emissions is considered to be consistent with the Māori worldview that acknowledges the interconnectedness of society with the environment. Given the financial savings and alignment of Option 1 with the Māori worldview, the cultural benefits of Option 1 are expected to be high.		
Effectiveness:			
How successful will you be in providing the outcome set by the objective?	Option 1 will support a transition to a net zero transport system, over time, and will therefore contribute to the outcome set by Objective CC.3. The initiatives to achieve the target are all aligned with international climate obligations, national climate policy directives including the ERP, and practice for communities to reduce carbon emissions. There is the chance that later regional emission reduction targets may be more ambitious and the policy package no longer adequate, however future amendments can address this. The option is considered the most effective option to achieve the objective at this time.	Option 2 generally maintains the current emissions trajectory, which is not consistent with net zero by 2050 and has not been demonstrated in the status quo setting to be effective in achieving the necessary emissions reduction.	Option 3 will achieve the transition to a net zero transport system, given time, and will therefore successfully achieve the outcome set by Objective CC.3. It will likely do so more promptly than Option 1. The initiatives to achieve the target are all aligned with international climate obligations, national policy directives, including the ERP, and practice for communities to reduce carbon emissions.
Efficiency:			
In being successful, will the total cost to society	Yes, Option 1 will achieve a low net cost to society to appropriately managing the	No, Option 2 is not successful in achieving Objective CC.3, and would result in high	No, Option 3 would result in a moderate net cost to society, since it forcefully

be low or net benefit to society be high?	transition to a net zero transport system. It will result in a high net benefit to society, since it appropriately provides for a transition to a net zero transport system, averting some of the adverse effects expected from climate change.	environmental costs due to the increasing adverse effects of climate change. It would result in a net cost to society, since it does not avert the worst effects expected from climate change.	directs the elimination of a reliance on private vehicle use and suitable areas for urban development, which some of the community may not support as being the most efficient means of reducing transport sector emissions. This option would require the greatest change in transport behaviour, which could cause anxiety in some pockets of society.
Risks of acting or not acting if there is uncertain or insufficient information:	While there is good data and projections on the impacts of climate change in the Wellington region[131], there is not full certainty on the exact effects of climate change or the results of mitigation measures. However, the risk of not acting is very high as the ongoing discharge of greenhouse gas emissions to the environment (which would be expected if the current trajectory of infrastructure delivery and the operations of the transport system is maintained) will exacerbate the adverse effects of climate change, which are already being felt in the region. In addition, given global efforts to act on climate change are being implemented to varying timeframes and at varying rates of success, it is unlikely that global warming will be limited to 1.5 degrees Celsius, further elevating the need for action. There is sufficient information, and direction in international and national policy, to act in this current RPS Change.		
Overall evaluation	Overall, Option 1 is recommended as it sets the transport system on a path to achieve net zero emissions by 2050. The Option 1 incudes a suite of policies that are in alignment with the central government direction see *Te hau mārohi ki anamata Towards a productive, sustainable and inclusive economy.* Option 1 also reflects the Avoid, Shift, Improve Framework outlined in the Ministry of Transport Green Paper *Hīkina te Kohupara – Kia mauri ora ai te iwi: Transport Emissions: Pathways to Net Zero[132] by 2050*, and appropriately manages this transition over time. As opposed to Option 2, which does not set a path to net zero, and Option 3, which seeks to transition at a pace that may not be compatible with community aspirations and tolerance for costs and changes.		

[131] Refer Section 3 above outlining the resource management issue related to climate change impacts
[132] Hīkina te Kohupara - Kia mauri ora ai te iwi (transport.govt.nz)

Climate change and agriculture – Promote and support rural resilience[133] to climate change and agricultural greenhouse gas emission reductions

This policy package is part of a suite of provisions designed to contribute towards achieving all of the new climate change objectives CC.1-CC.6. The purpose of these objectives is to support the Greater Wellington Region to transform into a low-emission and climate-resilient region, focusing on reducing greenhouse gas emissions and increasing the resilience of communities and nature to the effects of climate change.
Intent of this policy package: The intent of this policy package is to promote and support rural resilience to climate change and reductions in greenhouse gas emissions from the agricultural sector and avoid increases in gross agricultural greenhouse gas emissions
Policy package option 1 (Preferred approach): **The preferred approach - includes New policies CC.5, CC.13, and CC.15, supported by new Methods CC.5 and CC.8.** The proposed policy approach is primarily a non-regulatory one, working to establish a regional land management extension programme that actively promotes and supports changes in land use and/or land management practices, including practices to help restore the health, resilience, diversity and productivity of ecosystems. The focus of this extension programme is to both assist the rural community to increase their resilience to the effects of climate change and assist farmers to reduce their greenhouse gas emissions**.** There is also a regulatory component to the proposed policy approach to set a clear expectation there shall be no increase in gross agricultural greenhouse gas emissions and that these should be reduced where practicable, which will be primarily implemented through a future regional plan change (Policy CC.5) along with some immediate consideration through consenting and plan change processes (Policy CC.15). The proposed non-regulatory approach works to support central government adaptation and agricultural greenhouse gas emission reduction programmes and leverage off Greater Wellington Regional Council's existing rural networks, databases and environmental expertise that support change and improved management practices at a farm level. Existing programmes run by the Council's Land Management Department already focus on working with farmers to improve freshwater, reduce soil erosion, and protect/restore biodiversity, integrating these actions at a farm level. Council is therefore well placed to complement the extension work being signaled by the Primary Sector Climate Action Partnership between Government, the Primary Sector, and iwi/Māori - He Waka Eke Noa (HWEN). Central government has taken the lead role in the policy space for reducing greenhouse gas emissions from agriculture through HWEN. The aim of the initiative is to equip farmers to measure, manage and reduce agricultural emissions and develop an appropriate pricing mechanism for agricultural emissions at the farm

[133] Resilience to climate change is the ability to anticipate, prepare for, and respond to to hazardous events, trends, or disturbances related to climate. Improving climate resilience involves assessing how climate change will create new, or alter current, climate-related risks, and taking steps to better cope with these risks.

level by 2025. Government legislated emissions reduction targets[134] are out of scope for HWEN. In May 2022, HWEN made recommendations to implement a framework by 2025 to reduce agricultural greenhouse gas emissions. Key recommendations include:

- A farm-level pricing system (split-gas levy) is set up and running by 2025, to encourage emissions reductions and as an alternative to pricing agricultural emission via the New Zealand Emissions Trading Scheme (NZ ETS).
- This is supported by the development of a centralised calculator/tools for calculating emissions.
- The system will recognise reduced emissions from on-farm efficiencies and mitigations, including change in practice, technology uptake and on-farm sequestration.
- All farms having a written plan in place to measure and manage their greenhouse gas emission by 2025.
- Levy revenue will be invested in research, development, providing technical advice/information and a dedicated fund for Māori landowners.
- A System Oversight Board will set levy rates and prices.

Central government has indicated that a decision on whether agricultural emissions reductions will be driven by the New Zealand Emissions Trading Scheme (NZ ETS) or through the development of a different pricing mechanism will be made by December 2022, taking into account the recommendations of HWEN and advice from the Climate Change Commission.

As of 30 November 2022, restrictions on considering the effects of discharge of greenhouse gas emissions on climate change under the RMA will be repealed[135] and regional plans will be able to regulate the effects of greenhouse emissions on climate change. As agriculture is the second largest emitter of greenhouse gas in the region, contributing 34% of the region's greenhouse gas emissions, reducing greenhouse gas emissions from this sector is critical to achieve Objective CC.3. There is also a need to act now given the ongoing uncertainty of the national policy approach and the likely timeframes for this to be in place. Given the scale of emissions reductions that are required from the agricultural sector in the region to support Objective CC.1 and CC.3, and the need to ensure that the costs of the transition are shared fairly in accordance with Objective CC.2, there is an urgency to address agricultural emissions and ensure that there is no increase in gross agricultural greenhouse gas emissions from changes in land use and management practices now.

As such, Greater Wellington Regional Council is proposing to act now to establish a baseline where there is a minimum expectation that there should be no increase in gross agricultural greenhouse gas emissions in the region. The way in which this is to be implemented will be largely determined through a future regional plan change process. This will allow for the regional provisions to be designed and implemented in a way that best meets the objectives CC.1-CC.8 (and other RPS objectives), including providing a just and fair transition to a low-emissions and climate-resilient region. Issues of equity, for example for landowners that have low intensity land use, will be addressed as part of this process as will alignment with regional plan provisions relating to freshwater, indigenous biodiversity, and nature-based solutions. Issues of equity and potential costs will be particularly important for any areas of underdeveloped Māori

[134] Methane (CH_4) emissions reduced by 10% below 2017 levels by 2030, and by 24 – 47% by 2050; nitrous oxide (N_2O) and carbon dioxide (CO_2) to reduce to net zero by 2050.
[135] Sections 70A, 70B, 104E and 104F of the RMA.

land. By the time these provisions are developed, it is expected that the national approach to agricultural greenhouse gas emissions will be adopted by central government, which will enable the regional plan provisions to be aligned and ensure there is not unnecessary duplication and associated compliance costs.

In the interim, a 'consideration policy' is proposed as part of the policy approach when considering resource consent applications and plan changes associated with a change in intensity or type of agricultural land use. This will require that 'particular regard is given to' managing agricultural greenhouse gas emissions following a hierarchy:

- Reducing gross greenhouse gas emissions as a priority, where practicable, and
- Where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and
- Avoiding any increase in gross greenhouse gas emissions.

This is intended to align with proposed Policy CC.13, making it clear that the priority is to reduce gross emissions where practicable before any offsetting measures should be considered to achieve a net reduction in greenhouse gas emissions. It also sets a clear expectation that there should be no increase in gross agricultural greenhouse gas emissions as a key consideration when assessing resource consent applications for changes in type or intensity of agricultural land-use prior to the regional plan change process under proposed Policy CC.5.

The proposed package includes provisions to review the regional policy approach by 31 December 2024 (the date for notification of a full RPS review) to respond to any predicted changes in greenhouse gas emissions from the agricultural sector in the region and any new national direction.

Policy package option 2 (Status quo):

There are no policies in the operative RPS to promote and support climate-resilience in rural areas or consider agricultural greenhouse gas emissions. Greater Wellington Regional Council land management staff do provide incidental advice on climate change matters when working with farmers through existing programmes (e.g., hill country erosion and freshwater programmes). The status quo is for the Greater Wellington Regional Council to do nothing more to reduce agricultural greenhouse gas emissions or improve climate-resilience in the agricultural sector, and rely on central government policy initiatives. The key HWEN recommendations are outlined above, although it is not yet clear the extent to which these recommendations will be adopted or rejected by central government. The CCRA requires central government to have a system for farm-level accounting and reporting of 2024 agricultural greenhouse gas emissions at the farm level is in use by all farms by 1 January 2025[136]. The He Waka Eke Noa Recommendations Report[137] cites modelling estimates that by 2030, agricultural emissions of methane will reduce by 4.4% under existing government policies (e.g., NPS-FM, and Forestry in the NZ ETS) and market and economic drivers. This

[136] Climate Change Response (Emissions Trading Reform) Amendment Act 2020
[137] He Waka Eke Noa (2022), '*Recommendations for pricing agricultural emissions - Report to Ministers*', refer https://hewakaekenoa.nz/wp-content/uploads/2022/06/FINAL-He-Waka-Eke-Noa-Recommendations-Report.pdf and Resource Economics, 2022, Pricing agricultural GHG emissions: sectoral impacts and cost benefit analysis.

modelling also estimates that an additional 4 – 5.5% reduction in gross methane emissions could be achieved if a farm-level split-gas levy was applied to agricultural emissions along with incentives for actions to reduce emissions (while noting uncertainties about any future emission pricing)[138].

Policy package option 3 (Additional measures):

This option will involve the establishment of a target for reducing agricultural greenhouse gas emissions by set dates, with the regional plan establishing a regulatory approach to allocate the reduction target across the region. This regulatory approach would be supported by the extension programmes, outlined in relation to Option 1, aimed at supporting rural landowners and communities to increase resilience to climate change and reduce agricultural greenhouse gas emissions. This could be implemented through regulatory farm plans and be integrated with freshwater farm plans where required by the NES-F, and integrate with other initiatives such as erosion control and protection of indigenous biodiversity.

	Option 1 (Preferred – new policies and methods)	Option 2 (Status quo)	Option 3 (Alternative with additional measures)
Costs:			
Environmental	Low. This approach is mainly reliant on non-regulatory initiatives (particularly in the short-term) which may limit the effectiveness of the provisions to reduce agricultural greenhouse gas emissions and improve the resilience of rural communities to climate change. This option does not set clear targets for reducing agriculture greenhouse gas emissions and will therefore be less effective than Option 3 (greater environmental costs).	Medium – High. This approach will result in the least increase in rural resilience to climate change and decrease in greenhouse gas emissions from the agricultural sector for the Wellington Region. It risks delaying on-farm action to address agricultural greenhouse gas emissions and increases in emissions from the sector in the short term, contrary to the proposed climate objectives CC.1-CC.6. At the local level, there is an associated environment cost, as delaying the implementation of activities to reduce greenhouse gas emissions mean associated environmental co-benefits (e.g. nature-based solutions and improved management of livestock,	Nil. This option has no environmental costs compared to the alternative options. It would be the most effective to reduce agricultural greenhouse gas emissions by setting clear, timebound emission reduction targets specific to agriculture. It will also improve the resilience of rural communities to climate change, consistent with Option 1.

[138] Resource Economics, 2022, Pricing agricultural GHG emissions: sectoral impacts and cost benefit analysis.

		nutrients and pasture) are also delayed/not-realised.	
Social	Low-medium. The establishment of a minimum expectation of no increase in gross agricultural greenhouse gas emissions may impose an opportunity cost for some landowners, with wider social costs to rural communities. It may also lead to equity issues for some landowners/communities where current land use is low intensity and there is limited/no ability to change to more intensive/productive uses. However, the actual social costs to implement this approach will be primarily determined through a future regional plan change process which will consider these issues and impacts in detail. In the interim, proposed Policy CC.13 provides some flexibility to reduce net emissions through planting/offsetting while ensuring reducing gross agricultural greenhouse gas emissions is the priority where practicable. The social costs of the policy approach will also be reduced through the non-regulatory methods and support provided by Greater Wellington Regional Council through the targeted climate change extension programme to rural landowners and communities to help them reduce emissions and improve resilience to climate change.	Low-Medium. Option 2 has been designed by the HWEN partnership to reduce agricultural greenhouse gas emissions at a rate that will enable agricultural productivity to be maintained. The social costs to the rural community should therefore be reasonably low, although there may be some social resistance and anxiety associated with the introduction of new requirements. There are wider social costs of this approach in relation to fairly sharing the costs of transitioning to a low-emission and climate-resilient region. The other proposed climate provisions in the RPS require reductions in greenhouse gas from all other key emitting sectors in the region (e.g. transport, stationary energy and waste). If the RPS approach allows for increased emissions from the agricultural sector, which is the second largest source of emissions in the region, this will result in a social equity cost in the short term, transferring the burden of transitioning to a low-emissions and climate resistant region to other sectors.	Medium – High. Option 3 is likely to result in higher social costs to affected farmers and rural communities, although the nature and scale of social costs will be dependent on the agricultural greenhouse gas emission target and the way in which it is allocated. These social costs would be assessed in detail through a future regional plan change process. As with Option 1, social costs will be reduced to some extent by the targeted climate change extension programme to rural landowners and communities provided by Greater Wellington Regional Council.

Economic	Low-Medium. Relatively low cost to existing farming operations but potential future opportunity cost where existing farming operations want to move to a more intensive/productive use. Opportunity costs likely to be greater for lower intensity farming operations with future intentions to intensify their overall land-use. This may translate to impacts on land values for properties with less intensive land-use/lower greenhouse gas emissions. However, the actual additional economic costs directly attributable to the provisions are expected to be relatively low given existing NRP freshwater provisions which already place controls on more intensive agricultural land-uses. Many rural landowners are also aware that there is a need to reduce (or at least not increase) their agricultural greenhouse gas emissions in response to national policy – the provisions seek to ensure that this action starts now to avoid more costly action in the future. The future regional plan change required under Policy CC.5 is likely to result in increased resource consent costs for applications for land-use change that will, or may, result in an increase in agricultural greenhouse gas emissions. Actual costs will	Low (short-term) – high (long-term). Low short-term cost to agricultural landowners but there are potential costs of not reducing methane at a faster rate in terms of failing to meet the expectations of international markets. At a general level, greenhouse gas emission mitigation actions tend to become more expensive the longer they are delayed, given the scale of change/action required (in compressed timeframes) and the interim increases in emissions which then also need to be reduced. Therefore, delaying action to reduce agricultural greenhouse gas emissions in the short-term risks greater costs to the agricultural sector overall with steeper reductions required in the future. Another potential cost is transferring the burden of reducing greenhouse gas emissions unfairly to other sectors, when the agricultural sector is the second largest source of regional emissions. This could have adverse economic implications for businesses in other sectors. No additional implementation costs for Greater Wellington Regional Council compared to Option 1 and 2.	Medium-High. There could be significant costs for individual agricultural landowners depending on how ambitious the target is and the allocation approach. Regardless, economic opportunity and compliance costs are likely to be higher under this option compared to Option 1 and 2. There will also be greater cost to Greater Wellington Regional Council (recovered through rates) to administer an allocation system through regulatory farm plans.

	be assessed in detail through that future regional plan change process. Some cost to regional ratepayers for Greater Wellington Regional Council to initiate and resource a dedicated climate-change focused land management extension programme. However, this extension programme builds on current initiatives underway so the actual increase in costs for ratepayers is expected to be minor.		
Cultural	Low-Medium. Mana whenua / tangata whenua hold significant cultural, social, economic, and spiritual connections to the taiao (environment). Climate change is not viewed in isolation. There will be both environmental and economic costs for Māori land-based businesses. Existing socio-economic disparities of many Māori groups and a collective land ownership model can impact on the ability and speed at which Māori businesses and their communities are able to make strategic decisions regarding climate change. This option responds partly to concerns expressed by some iwi groups that agricultural emissions should be reduced along with other emission sources, and that an increase in gross agricultural	Medium (slightly higher than Option 1) due to the low scale response and implementation delay to take action to reduce agricultural greenhouse gas emissions. While Māori agribusiness partners have been involved in the development of HWEN, there is no indication that Māori landowners with undeveloped rural land will be treated any differently under HWEA. The Government has yet to make any decisions in relation to the system and must uphold Treaty obligations.[139]	Low-Medium. May result in potential equity issue associated with restrictions on the ability to intensify undeveloped Māori land. However, an emissions reduction scheme for agricultural greenhouse gas emissions could be designed using a fair-share allocation system to ensure owners of undeveloped Māori land are not unfairly penalised.

[139] The government has announced funding to help mana whenua / tangata whenua owners to reduce agricultural emissions. https://www.beehive.govt.nz/release/government-backs-m%C4%81ori-climate-action

	greenhouse gas emissions should be avoided. However, others have raised concerns about the impacts of a "no-increase" line on the ability of Māori landowners to intensify use on currently undeveloped land. The actual cultural costs to implement this approach will be primarily determined through a future regional plan change process which will consider these issues and potential impacts of Māori landowners in detail. In the interim, proposed Policy CC.13 provide some flexibility to reduce net emissions through planting/offsetting while ensuring reducing gross agricultural greenhouse gas emissions is the priority where practicable.		
Benefits:			
Environmental	Medium. Will ensure gross agricultural greenhouse gas emissions do not increase and reduce overtime, contributing to the regional, national and international response to climate change. Reducing agricultural greenhouse gas emissions presents one of the most immediate opportunities to reduce emissions and help slow the rate of global warming, helping to avert the most acute climate risks, including adverse effects on the environment and indigenous biodiversity, including taonga species.	Low. Some environmental benefit from BAU, particularly through freshwater farm planning, coupled with the small emission reductions predicted from HWEN initiatives (once these are implemented).	Medium-High. This option would be the most effective to deliver reductions in agricultural greenhouse gas emissions. It will be the most effective to drive land-use practices and change in rural areas to reduce emissions. Land uses and activities that have lower greenhouse gas emissions are likely to be more sustainable for the wider farm system (e.g. lower stock numbers and fertiliser use, integration of nature-based solutions/regenerative farming practices). More sustainable farming has associated benefits for the sustainability,

	The proposed approach is based on a combination of non-regulatory and regulatory methods which is generally accepted as being most effective to improve environmental outcomes through changes in land-use practices and land-use, including reducing greenhouse gas emissions. The proposed approach will achieve synergies between multiple environmental outcomes, including reducing greenhouse gas emissions, carbon sequestration, indigenous biodiversity, land stability and water quality.		and therefore climate-resilience, of farms and communities. This option also has the same environmental benefits as Option 1 in terms of achieving synergies between multiple environmental outcomes, including reducing greenhouse gas emissions, carbon sequestration, indigenous biodiversity, land stability and water quality.
Social	Medium. The proposed approach focuses on non-regulatory support for rural communities to improve land management practices and land-use to improve resilience to climate change and reduce gross agricultural greenhouse gas emissions. This will directly benefit rural communities in the region and lead to more sustainable, resilient rural communities and economies. May lead to improved social cohesion in rural communities through collective efforts to reduce agricultural greenhouse gas emissions.	Low. The approach could provide social benefits in terms of a nationally consistent approach to the reduction of agricultural greenhouse gas emissions, which may lead to improved perceptions of being treated fairly in the industry. It would allow additional time for the agricultural sector to prepare for reducing their emissions in the future. However, the sector has been aware for some time that emissions reductions will be required so any social benefits expected to be minor.	Low. Social benefits similar to Option 1 but there is the risk of resistance in rural communities if the greenhouse gas emission reduction targets are viewed as being too ambitious, onerous and costly. This could result in limited uptake and social benefits within rural communities.
Economic	Medium. The proposed approach ensures action is taken now to reduce agricultural greenhouse gas emissions though non-	Low-Medium. This approach will potentially result in short term benefit to the agricultural sector, by imposing no	Medium. The short-term economic costs will be higher under this option, but the economic benefits are also expected to

	regulatory and regulatory measures. As outlined in section 3.0 (The impacts of climate change), there are significant economic benefits in acting now in relation climate change to avoid more costly climate change responses (mitigation and adaption) in the future. The proposed approach sets a clear expectation that there should be no increase in gross agricultural greenhouse gas emissions, while providing some flexibility on how this is best achieved through a future regional plan change (which will be subject to s32 requirements) and at the landowner level when land-use change is proposed. This allows for cost-effective approaches to be developed to help achieve a just, fair transition. In the interim, proposed Policy CC.13 provide some flexibility to reduce net emissions through planting/offsetting while ensuring reducing gross agricultural greenhouse gas emissions is the priority where practicable. The approach is primary based on-non regulatory measures to support rural landowners improve land management practices and land-use to improve resilience to climate change and reduce gross agricultural greenhouse gas emissions. This will ensure that there are benefits or limited impacts/costs for the majority of rural landowners and	restriction on increasing greenhouse gas emissions from land use change to more intensive/productive uses in the short-term. However, any short-term economic benefits are expected to be outweighed by the costs of making greater and steeper emission reductions in the future.	be higher in the long-term. As with Option 1, there are significant economic benefits in acting now in relation climate change to avoid more costly climate change responses (mitigation and adaption) in the future. Higher emission reduction efforts sooner should increase the preparedness of the rural sector for bigger changes that may be required by central government in the future. This could also put the region is a leading position in terms of rural sustainability with associated economic benefits.

	communities (except those with intentions to intensify their current land-use).		
Cultural	Low-Medium. Cultural benefits associated with improving the resilience of Māori land to climate change. Reducing agricultural greenhouse gas emissions now will help to slow climate change and the potential adverse effects on current and future generations of mana whenua / tangata whenua, including impacts on indigenous biodiversity and taonga species.	Low – generally maintains the status quo and relies on national response. It is unclear if/how the national response will have specific provisions relating to greenhouse gas emissions from agriculture on Māori land.	Low-Medium. Responds to concerns from mana whenua / tangata whenua about a lack of equity by setting a clear target to reduce agricultural greenhouse gas emissions in the region.
Effectiveness:			
How successful will you be in providing the outcome set by the objective?	This option is considered to be effective in achieving climate change objectives CC.1-CC.6. The proposed approach will support central government initiatives with a proactive regional land management extension programme and a requirement for no increase in gross agricultural greenhouse gas emissions in the region and reduction where practicable. This combined non-regulatory and regulatory approach will be effective in achieving: • Low emission and climate-resilient rural areas (Objective CC.1) • A fair transition (Objective CC.2) • Contributing to new-zero emissions by 2050 (Objective CC.3).	The effectiveness of BAU depends on the strength of the measures adopted by central government in response to the recommendations of HWEN. As noted above, the He Waka Eke Noa Recommendations Report[140] cites modelling estimates that agricultural emissions of methane will reduce by 4.4% by 2030 under existing government policies and an additional 4 – 5.5% reduction can be achieved through implementation of their recommendations. These total reductions are in line with the legislated 10% reduction target by 2030 for methane[141]. However, it is noted that meeting this target is contingent on a number of	A fair-share or proportionate agricultural greenhouse gas reduction target, combined with a strong regulatory approach, combined with the emission reductions sought from transport, energy, waste and industry, is likely to be effective in achieving Objective CC.3. However, this approach is potentially inconsistent with national policy response being considered by central government and may impose significant restriction on the use of land for more intensive agriculture. It may therefore not be supported by agricultural industry and rural communities more broadly, compromising its effectiveness in achieving objectives CC.1-CC.8.

[140] He Waka Eke Noa (2022), '*Recommendations for pricing agricultural emissions - Report to Ministers*', refer https://hewakaekenoa.nz/wp-content/uploads/2022/06/FINAL-He-Waka-Eke-Noa-Recommendations-Report.pdf and Resource Economics, 2022, Pricing agricultural GHG emissions: sectoral impacts and cost benefit analysis.
[141] He Waka Eke Noa (2022), '*Recommendations for pricing agricultural emissions - Report to Ministers*', refer https://hewakaekenoa.nz/wp-content/uploads/2022/06/FINAL-He-Waka-Eke-Noa-Recommendations-Report.pdf

	However, not setting specific emission reduction targets for agricultural greenhouse gas emissions is likely to be less effective and certain in terms of supporting the achievement of Objective CC.3 – a 50% net reduction of greenhouse gas in the Wellington Region by 2030 and net-zero emissions by 2050 compared to Option 3.	uncertainties. Market and economic drivers will be influenced by a range of matters, including the price signals of the NZ ETS.	
Efficiency:			
How successful will you be in providing the outcome set by the objective?	This option is considered to be effective in achieving climate change objectives CC.1-CC.6. The proposed approach will support central government initiatives with a proactive regional land management extension programme and a requirement for no increase in gross agricultural greenhouse gas emissions in the region and reduction where practicable. This combined non-regulatory and regulatory approach will be effective in achieving: • Low emission and climate-resilient rural areas (Objective CC.1) • A fair transition (Objective CC.2) • Contributing to net-zero emissions by 2050 (Objective CC.3). However, not setting specific emission reduction targets for agricultural	The effectiveness of BAU depends on the strength of the measures adopted by central government in response to the recommendations of HWEN. As noted above, the He Waka Eke Noa Recommendations Report[142] cites modelling estimates that agricultural emissions of methane will reduce by 4.4% by 2030 under existing government policies and an additional 4 – 5.5% reduction can be achieved through implementation of their recommendations. These total reductions are in line with the legislated 10% reduction target by 2030 for methane[143]. However, it is noted that meeting this target is contingent on a number of uncertainties. Market and economic drivers will be influenced by a range of	A fair-share or proportionate agricultural greenhouse gas reduction target, combined with a strong regulatory approach, combined with the emission reductions sought from transport, energy, waste and industry, is likely to be effective in achieving Objective CC.3. However, this approach is potentially inconsistent with national policy response being considered by central government and may impose significant restriction on the use of land for more intensive agriculture. It may therefore not be supported by agricultural industry and rural communities more broadly, compromising its effectiveness in achieving objectives CC.1-CC.8.

[142] He Waka Eke Noa (2022), '*Recommendations for pricing agricultural emissions - Report to Ministers*', refer https://hewakaekenoa.nz/wp-content/uploads/2022/06/FINAL-He-Waka-Eke-Noa-Recommendations-Report.pdf and Resource Economics, 2022, Pricing agricultural GHG emissions: sectoral impacts and cost benefit analysis.
[143] He Waka Eke Noa (2022), '*Recommendations for pricing agricultural emissions - Report to Ministers*', refer https://hewakaekenoa.nz/wp-content/uploads/2022/06/FINAL-He-Waka-Eke-Noa-Recommendations-Report.pdf

	greenhouse gas emissions is likely to be less effective and certain in terms of supporting the achievement of Objective CC.3 – a 50% net reduction of greenhouse gas in the Wellington Region by 2030 and net-zero emissions by 2050 compared to Option 3.	matters, including the price signals of the NZ ETS.	
Risks of acting or not acting if there is uncertain or insufficient information:	There is some uncertainty in acting through the provisions as it not yet clear what regional plan provisions and consenting decisions will be needed to avoid any increase in gross agricultural greenhouse gas emissions and reduce these where practicable. Similarly, there is some uncertainty about the extent of actions and support required to improve the resilience of rural communities to climate change and reduce gross agricultural greenhouse gas emissions in the region. The risks of acting through the regulatory provisions will be assessed in more detail though the future regional plan change and the risks of acting through non-regulatory approaches is considered to be low. Conversely, the risks of not acting are considered to be significant – this will simply lead to more costly responses to climate change (mitigation and adaption) in the future and the adverse effects and impacts of climate change on the economy and environment will continue to increase. In addition, there are risks that delaying reductions in greenhouse gas from this sector will transfer some of the burden of transitioning to a lower-emission and climate resilient region to other sectors, which is unfair and inconsistent with proposed Objective CC.2 given that agriculture is the second largest source of emissions in the region.		
Overall evaluation	Overall, Option 1 is considered to be the most effective and efficient to achieve objectives CC.1 – CC.8 as it leverages off Greater Wellington Regional Council's existing expertise, rural networks and relationships in delivering freshwater and soil conservation programmes to deliver cost-effective reductions in agricultural greenhouse gas emissions. Upskilling our land management section to work alongside industry and research agencies to support farmers identify and implement best practice provides a critical opportunity for the Council to help increase the climate-resilience of the rural community and support reductions in agricultural greenhouse gas emissions. This is combined with a regulatory approach to set a minimum expectation of no increase in gross greenhouse gas emissions from the agriculture sector and a reduction where practicable through consenting decisions and a future regional plan change. This provides certainty that agricultural greenhouse gas emissions will be reduced in the region through an immediate non-regulatory and regulatory response while providing flexibility to determine the most cost-effective approach to achieve this and ensure alignment with the national policy response once this is confirmed by central government.		

Climate change and organic waste – Reducing greenhouse gas emissions

This policy package is to achieve the Objective CC.3, with the amendments to policies and methods to reduce net emissions by 50% from 2019 levels by 2030, with net zero by 2050.
Intent of this policy package: This policy package is to work towards achieving Climate Change Objective CC.3 by reducing emissions from the waste sector. Some cities and districts do have systems in place to reduce organic waste entering landfills to reduce emissions. This policy package will attempt to intervene into the existing waste system for organic waste to further reduce this type of waste entering landfills where feasible as once this waste is in landfills, it is too late in the process to effectively reduce emissions. The intent is to apply the waste hierarchy with a focus on reducing this waste stream.
Proposal and alternatives are: **Policy package option 1 (preferred approach)**: Amend existing provisions as follows: Policy 65: Supporting and encouraging ~~Promoting~~ efficient use and conservation of resources – non-regulatory To ~~promote~~ support and encourage conservation and efficient use of resources by: (a) applying the 5R's (Reduce, Reuse, Recycle, Recover, and Residual waste management) ~~reducing, reusing, and recycling waste~~; (b) reducing *organic waste* at source from households and commercial premises; (c) increasing the diversion of wastewater sludge from wastewater treatment plants before deposition to municipal landfills; (d) using water, and energy efficiently, and (e) conserving water and energy. Method 17: Reducing greenhouse gases emissions from waste streams Wellington Regional Council in partnership with mana whenua / tangata whenua works with city and district councils, the waste management sector, industry groups and the community to: (a) reduce organic matter at source, and (b) work towards implementing kerbside recovery of organic waste from households and commercial premises, and (c) encourage development opportunities for increasing the recovery of biogas from municipal landfills, and (d) increase the diversion of *organic waste* (sludge) from the waste stream before deposition to municipal landfills.

Implementation: Wellington Regional Council, iwi authorities, city and district councils.

(Definition of organic waste, below, associated with Policy 65 and Method 17)

Organic waste: Wastes containing carbon compounds that are capable of being readily biologically degraded, including by natural processes, such as paper, food residuals, wood wastes, garden and plant wastes, but not inorganic materials such as metals and glass or plastic. Organic wastes can be decomposed by microorganisms into methane, carbon dioxide, nitrous oxide, and simple organic molecules (plastic contains carbon compounds and is theoretically organic in nature, but generally is not readily biodegradable).

Policy package option 2 (status quo): No change to Policy 7 (a)(ii)(1), (2), (3), Policy 65 and Method 17.

Policy package option 3 (alternative with additional measures): Remain with proposals above (option 1) to Policy 7, 65 and Method 17, however increase stringency of the provisions and require implementation the medium term.

	Option 1 (Preferred – amended policies and methods)	Option 2 (Status quo)	Option 3 (Alternative with additional measures)
Costs:			
Environmental	Lower cost to the environment with the implementation of this policy and method will result in a greater reduction of greenhouses gas from the waste stream compared with the status quo (where they are most concentrated - sludge), and an overall reduction in residual waste (reducing sludge deposited to landfill) where greenhouse gases are more difficult to remove.	Low: The status quo will result in a lower cost to the environment but at a time frame that does not give effect to the RPS objectives for climate change or central governments timeframes for change.	High: Additional costs will fall to providers (councils and the waste sector), given the proportion of emissions that require further controls.
Social	Medium: To implement this policy package will mean greater costs to councils and those in the waste management sector. Cost will fall for the community in ensuring effective waste management systems are in place.	Low: The status quo does not involve any immediate increase in cost for the implementation of these policies other than what Councils have already undertaken to reduce greenhouse gass	High: Additional costs to the Council and community to implement the alternative option. This is through the rapid changes and hence costs that would be required for implementation.

		from the waste steams (i.e., existing landfill gas systems).	
Economic	Moderate: Implementing this policy package will result in costs in the improvements to existing plant and implementing a greater proportion of sludge from the WWTP to composting or utilisation of new technologies to reduce the total volume going to landfill. Once in landfill, the system relies on landfill gas extraction system to neutralise the methane emissions. This position of increasing landfill sludge is too late in the reduction strategy to be cost effective over the medium to long term.	Medium to low: There is cost to the implementation and maintenance of the existing systems in place, i.e., landfill gas extraction systems.	High: Considerable cost for the alternative option. The cost to Councils and infrastructure providers is high in a short term. This cost is either borne by the providers or councils concerned or passed onto consumers or ratepayers. Given the costs that have already been committed by some councils and infrastructure providers into enhancements to bring about a reduction in emissions, there would be further considerable costs to increase this reduction which is not planned for and is not the preferred option at this stage.
Cultural	Moderate: Mana whenua / tangata whenua have raised concerns about the amounts of waste produced by society and the means of reducing that waste. This policy reiterates the overall waste reduction policies of the RPS and reduction in greenhouses gases as a result.	Low-moderate: Mana whenua / tangata whenua have submitted the status quo is not an option to reducing waste in the region.	High: Mana whenua / tangata whenua have whilst raising concerns with the current waste management system but are cognisant of the costs to the community from the policy approach of the alternative option.
Benefits:			
Environmental	High: Environmental benefit with the implementation of the preferred option. Environmental benefits would be increased in terms of greater reduction in emissions from the waste sector.	Low: There is no increase in environmental benefit in maintaining the status quo. The operative provisions do not include any climate change interventions for waste management reduction in emissions.	High: The alternative option would result in a high environmental benefit If implemented. However, the costs of this option are equally high and not the preferred option.

Social	High: Further social and cultural benefits would accrue through the community being satisfied that climate change initiatives are making progress towards New Zealand's overall reduction in emissions.	Low: Benefits of the status quo are not high compared with the preferred option. The benefits would accure over the medium to long term but not within the objectives of this plan change.	Medium – High: The alternative option will also provide the necessary benefits outlined in the preferred option 1. The benefits would be in greater uptake of the policies and implementation by councils and providers. The benefits however may be harder to realise if the additional costs of this option are dominant in the short term, for the reasons mentioned above. The alternative option whilst beneficial would not overall incur benefits at the same duration as the preferred option.
Economic	High - moderate: The new policy settings may also provide future job opportunities for companies and individuals to work in the waste sector to further lower emissions in various stages of waste. Recycling of the waste stream could assume greater prominence in reducing overall waste to landfill and diverting the organic fraction into new uses or products. The diversion processes will provide employment opportunities across the region. The preferred option has the mix of provisions that will effectively result in environmental benefits with the faster reduction of emissions and also provide employment opportunities leading to increased social and cultural wellbeing in the region.	Low - Moderate: There economic benefits of the status quo are low to moderate, depending on the continued update of waste minimisation by Councils and the community, and plans to divert sludge from the waste stream.	High: The economic costs in the waste sector would remain at the status quo, therefore a benefit for waste management operators.

Cultural	High: Mana whenua / tangata whenua have indicated that the benefits of the preferred option are high compared with the status quo.	Low: Mana whenua / tangata whenua have submitted the status quo has low cultural benefits.	High: Mana whenua / tangata whenua have suggested the costs of the alternative option may imposed undue costs of communities to achieve the reductions required.
Effectiveness:			
How successful will you be in providing the outcome set by the objective?	The policy package for waste (Policy 7, 65 and Method 17) includes reducing emissions from WWTP, organic waste diversion from WWTP, improvements to land gas extraction, the 5'rs, reducing waste at source, promoting efficient use of water and energy, and implementing this package through waste reduction strategies, promotion of biogas, and substituting existing fossilised fuels with woody biomass fuels. The package overall will make a difference to the total emissions in the waste stream from processing and disposal of waste to reduce biogenic methane and carbon dioxide. The effectiveness of the package will depend on implementation through Method 17. This level of intervention is set to promote and assist in the development of waste reduction and diversion and the production of substitutes. The policies recognise that some of these initiatives have begun in some Councils with waste reduction strategies, diversion of waste and landfill gas capture. However, as	The status quo will not advance the reduction in biogenic methane from existing waste streams. There are policy interventions from central government that will over time encourage and promote changes to the way waste is managed and greenhouse gas emissions are reduced where the opportunities exist. However, the status quo will not be activated in sufficient time to meet the region's objectives for climate change by 2030. The status quo is not an effective option for climate change and waste reduction.	The alternative option would advance the progression of policies towards greater waste reduction and removal of biogenic methane from the waste stream. The requiring or directive provisions would ensure the policies are placed into district plans and the time requirement would anticipate an almost immediate reduction in biogenic methane. However, the option recognises that some territorial authorities have existing systems already operating and are making gains towards further reductions in emissions. However, considering the total emissions from waste streams is not large compared to transport or agriculture, it draws resources and technologies away from other more urgent areas for climate change reduction. So, whilst partially effective, the alternative option of greater stringency and restricted time for action is not the most effective option.

	discussed by the Climate Commission[144], further enhancements can be made or started to increase the reduction of biogenic methane from the waste stream. Enhancements will require further investment by all Councils (regional and territorial authorities), and companies associated with waste management to further develop technologies in the way waste is captured, processed, and disposed of, to reduce the total discharge of methane into the atmosphere.		
Efficiency:			
In being successful, will the cost to society be low or the net benefit to society be high?	The preferred option will have a net cost to society in the short term in updating new plant and processes to reduce emissions from waste streams. In terms of reduction in emissions in the waste management sector, the net cost to society is lower than the alternative option. While the net cost of acting is lower than the long-term cost of not acting across all sectors, it is noted that the waste sector contribution is a smaller contributor to New Zealand's emissions and the cost needs to be considered in this context (i.e., where is it most efficient to take action). There is a positive benefit to society if the preferred option is adopted. The benefit will be in enhancing existing systems that	No new costs to society through the operative version of the RPS. Existing costs lie with new work programmes already up and running in Councils or planned, i.e., recycling programmes, and diversion of organic waste from landfill. No net benefit to society with the status quo.	This option is likely to be the costliest of the options. The costs will lie in new systems, plant, and methods to remove higher rate of emissions from the waste streams. This cost would be proportionally higher for the smaller councils than the larger city councils. This option is likely to provide a net benefit more rapidly compared to the preferred option.

[144] Reference Climate change Commission report (page 122)

	already exist in larger councils' waste management stream, and from these systems to act as a lever to new programmes to further reduce emissions and reduce waste in the medium term.		
Risks of acting or not acting if there is uncertain or insufficient information:	There is a low risk with this policy package for organic waste. Existing technologies and information are generally available or known to effect change in the organic waste traction to reduce emissions.	N/A	There is a moderate risk with the alternative option. This is through additional resources required to effect change and encourage or enable new technologies and changes in the waste sector where the certainty of outcome is not yet fully tested.
Overall evaluation	Overall, the preferred option is considered the most cost effective to reduce emissions from the organic waste sector. Existing systems for emissions reduction have already been initiated, and these require further investment and resources to effect change in the sector to reduce emissions and assist in meeting the climate change objectives.		

Climate change and energy – Reducing greenhouse gas emissions

This policy package is part of a suite that contribute to achieving new Objective CC.3 to reduce net emissions by 50% from 2019 levels by 2030, with net zero by 2050.
Intent of this policy package: Energy powers the regional economy, our infrastructure and everyday activities. The Government has set ambitious targets of 100% renewable electricity by 2030 and 50% renewable energy by 2035[145]. Accelerating the development of new renewable electricity generation across the economy and new renewable fuels (such as bioenergy and green hydrogen) is a focus of the Governments response to climate change in the ERP. Significant increases in renewable energy generation (including renewable electricity[146]) are required nationally to achieve energy targets, meet growing demand and support emissions reductions in other sectors (including transport, industry).

[145] The renewable energy target has been set in the ERP.
[146] It is estimated that national renewable electricity generation will need to increase between 70% (New Zealand Infrastructure Strategy) and 100% (Te mauri Hiko) by 2050.

Stationary energy emissions are the third highest source of emissions in the region, although these fell by 18% between 2001 and 2019[147] Top sector contributors to regional stationary energy emissions are electricity, natural gas and petrol/diesel generators (8%, 6% and 2% of gross regional emissions respectively). The fall in regional stationary energy electricity emissions is largely due to the national electricity generation mix, or in other words renewable electricity that is largely generated outside of the region. While the region is home to some large scale wind farms and community scale solar development, it has comparatively low levels of renewable electricity generation. This makes the region largely reliant on the national and local network for electricity supply[148] and vulnerable to network disruption. Both national grid assets and the local electricity distribution networks in the region are exposed to a range of natural hazard risks; including seismic hazards[149], coastal flooding and river flooding[150].

The policy package in Change 1 seeks to further encourage and enable small and community scale renewable electricity generation where appropriate to give better effect to Policy F of the NPS-REG, and better recognise the benefits of regionally significant infrastructure that contributes to reducing emissions. The policy package supports increased energy resilience security by supporting local generation.

The policy package focuses on small and community scale renewable energy generation. Large scale renewable electricity generation activities, where supplied to the electricity network[151], are covered by existing provisions of the RPS, including objective 9[152], objective 22[153] and that the proposed changes to Policy 7 and Policy 39 will support these activities.

Proposal and alternatives are:

Policy package option 1 (preferred option): Amend existing provisions as follows:

Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans
District and regional plans shall include policies and/or methods that recognise:

(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure <u>in particular low and zero carbon regionally significant infrastructure</u> including:
  (i) people and goods can travel to, from and around the region efficiently and safely <u>and in ways that support transitioning to low or zero carbon multi modal travel modes</u>;
  (ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;
  (iii) people have access to energy, <u>and preferably low or zero carbon energy,</u> so as to meet their needs; and (iv) people have access to telecommunication services.

[147] Wellington Regional Greenhouse Gas Inventory
[148] The dependence on externally generation electricity is recognised as a regionally significant issue in the RPS.
[149] Wellington Electricity Earthquake Readiness Proposal
[150] NIWA reports ' Coastal Flooding Exposure Under Future Sea-level Rise for New Zealand' and 'New Zealand Fluvial and Pluvial Flood Exposure'.
[151] The definition of Reginally Significant Infrastructure in the RPS includes "*facilities for the generation and transmission of electricity where it is supplied to the network, as defined by the Electricity Governance Rules 2003*".
[152] RPS Objective 9: "*The regions energy needs are meet in ways that …(b) diversify the type and scale of renewable energy development, (c) maximise the use of renewable energy resources, (d) reduce dependency on fuels…"*
[153] "RPS Objective 22: "*A compact well designed and sustainable regional form that has an integrated, safe and responsive transport network and … (l) essential social services to meet the region's needs".*

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

Policy 11: Promoting and enabling 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~~ energy efficient alterations to existing buildings;

(b) enable the installation and use of domestic scale (up to 20 kW) and *small scale* distributed renewable energy generation (up to 100 kW)~~; and provide for energy efficient alterations to existing buildings;~~

Definition for small and community scale distributed renewable electricity generation is taken from the NPS-REG, below:
Small and community-scale distributed electricity generation means renewable electricity generation for the purpose of using electricity on a particular site, or supplying an immediate community, or connecting into the distribution network

Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration

When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:

(a) the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or *regionally significant infrastructure*, in particular where it contributes to reducing greenhouse gas *emissions*; and
(b) protecting *regionally significant infrastructure* from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and
(c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and
(d) significant wind, solar and marine renewable energy resources within the region.

Policy package option 2 (status quo): no change to Policy 7, 11 or Policy 39.

Policy package option 3 (alternative with additional measures): Remain with proposals above to Policy 7, 11 and Policy 39, however increase stringency of the provisions and require implementation in the medium term (e.g. including more directive provisions and a timeframe by which a targeted quantity of renewable electricity generation needs to be provided within the region. It is assumed that larger scale renewable energy generation projects (RSI) would be required to meet more stringent provisions in relation to renewable energy).

	Option 1 (Preferred – amended policies)	Option 2 (Status quo)	Option 3 (Alternative with additional measures)
Costs:			
Environmental	Low: Overall, there is not a considerable environment cost associated with promoting and enabling small and community scale renewable energy development and recognising new and existing benefits of low and zero carbon RSI. This could result in greater localised changes, however, won't necessarily result in significant environmental costs. There may be some localised environmental costs associated with renewable energy and low and zero carbon RSI, dependant on the type of infrastructure, (e.g. primarily landscape and construction effects), however the policy option will not supersede national and regional policy direction to providing for those matters (e.g. s6 of the RMA, and RPS Objective 17 and Policies 26, 27 and 50). These costs are significantly less than the regionally and nationally significance of renewable energy and reducing emissions. Environmental costs will be particularly low for small and community scale renewable electricity generation. Other low and zero carbon RSI are likely to include national grid and local electricity network upgrades and public/active transport infrastructure. They may also	Low: The status quo does not involve any immediate increase in environment cost for the implementation of these policies other than what Councils have already undertaken to reduce Greenhouse gas emissions from the promotion of renewables, or RSI development.	Low - Moderate: Same as Option 1, however it is expected that this option would promote a more rapid expansion of targeted infrastructure (e.g. renewable energy generation) in response to timeframes and targets set. This could result in greater localised change, however, won't necessarily result in significant environmental costs. Environmental costs are dependent on the specific location, type, scale and methods associated with RSI. Additionally, these costs are significantly less than the regional and national significance of renewable energy and reducing emissions.

	include carbon capture and storage (CCS), grid scale batteries energy storage systems (BESS), bioenergy and green hydrogen (although it is uncertain how viable these projects will be to develop in the region and market appetite to explore these projects in the region.		
Social	Low: Overall, there is not a considerable social cost associated with the proposed amendments to the provisions; to promote and enable small and community scale renewable energy development, and recognise new and existing benefits of low and zero carbon RSI. Costs to the community may arise in terms of social harmony, if low carbon developments are opposed by some members of the local community (e.g. due to local amenity concerns). However other members of the local community may equally be supportive of this infrastructure as an enhancement of local amenity. Social and amenity costs of small and community scale renewable energy are unlikely to be significant. While the provisions strengthen existing provisions, they are not considered to be a significant departure from the status quo and the social costs are therefore considered to be limited.	Moderate: The status quo may not be sufficiently directive to ensure district plans provide provisions which support households and communities to provide for their wellbeing through low carbon and small/community scale renewable energy projects. This may make it harder for communities to develop community scale renewable electricity projects and attain the associated benefits to social well-being this can provide". Under the status quo, consideration may not be given to the contribution of RSI to reducing greenhouse gas emissions. This could have a significant opportunity cost for society, as these beneficial projects may be more challenging to consent as a result.	Low - Moderate: Same as Option 1, however it is expected that this option would promote a more rapid expansion of targeted infrastructure (e.g. renewable energy generation) in response to timeframes and targets set. This could result in greater localised changes to amenity, however this wouldn't necessarily result in significant social costs, and these costs are likely to be significantly less than the regional and national significance of renewable energy and reducing emissions.

Economic	Low - Moderate: Given that the proposal is for minor amendments to existing RPS provisions, most councils will already have relevant provisions in existing and proposed plans. There will be some costs related to amending these, if they do not give full effect to the amended wording of the RPS. It is not considered likely that the proposed wording would result in additional consenting requirements. Councils will need to consider the benefits of RSI contributing to reducing greenhouse gas emissions. This may add to the costs associated with assessing and processing consent applications for RSI that require additional considerations. However, these assessment, processes, already exist with the status quo and are not expected to materially increase due to the proposed provisions. There is a potential increase in costs to applicants to demonstrate the proposal has low or zero carbon, however this will be limited to those projects which support emissions reductions, and these costs may be balanced by reduced costs through the consenting process (e.g. consideration of emission reductions may lead to a smoother consenting process and reduce consenting costs). Again, any increase in economic costs over and above status quo is expected to be limited (if at all).	Low: The status quo will not further any reduction in emissions or impose any additional consenting costs for renewable energy and regionally significant infrastructure. The economic costs are therefore assessed as low/nil.	Low - Moderate: The economic cost to companies and institutions providing RSI may reduce as consenting processes and plans give greater weight to the benefits of these activities, including reductions in emissions. An increase in consent applications for RSI activities may increase costs to councils, in assessing and processing consent applications that require additional considerations, however, these assessment, process, and engagement costs exist with the status quo. There could be an economic risk to Council if the market did not deliver on providing a rapid expansion of targeted infrastructure (e.g. renewable energy generation) in response to timeframes and targets set. However the RPS could set an aspirational target, or revaluate targets over time.

Cultural	Low - Moderate: Mana whenua / tangata whenua have noted the cost of development of RSI can have cultural costs to mana whenua / tangata whenua if the development affects treaty claims and rights under those claims. There is potential that cultural effects could arise from RSI, however it depends on the location, type, scale and methods associated with the RSI. However, the provisions do not propose any changes to how mana whenua / tangata whenua values/Treaty considerations are recognised and provided for when renewable energy or regional significant infrastructure is proposed. There is therefore considered to be limited change from the status quo.	Low: Mana whenua / tangata whenua have noted that the development of RSI can have cultural costs to mana whenua / tangata whenua if the development affects treaty claims and rights under those claims. The existing provisions do not rescind obligations to uphold treaty obligations (or the RMAs cultural provisions) in plan development or when considering consent applications.	Low - Moderate: Same as Option 1. This option could promote greater renewable electricity generation at scale, however it doesn't necessarily follow that cultural effects will be greater; as cultural effects will depend on the location, type, scale and methods associated with the RSI. Existing processes and obligations to protect cultural interests would be unchanged by this option.
Benefits:			
Environmental	Moderate: The main benefit to the environment would be the promotion of activities which would support emissions reductions. Climate change is one of the most significant risks to the natural environment, including impacts on habitats and species. Renewable energy sources can replace non-renewable energy sources reducing air pollution e.g. from diesel and natural gas energy use. Wider environmental benefits of promoting renewable energy include supporting other sectors to transition away from fossil fuels	Low: The status quo does require supportive measures for small scale renewable energy and RSI, however these provisions are not as strongly worded as options 2 and 3 and the consideration of emission reductions is not provided for in consenting. The environmental benefits of renewable electricity generation and RSI developed under the status quo will therefore be lower than the other options considered.	Moderate – High: Environmental benefits would be the same as option 1, however potentially at a larger scale, if the provisions were successful in supporting the market to develop low emissions RSI in the region.

	use, supporting improved air, water and soil quality (e.g. as vehicles transition to low emission fuels).		
Economic	Moderate: The preferred option will provide some benefits by supporting employment opportunities through the development of small and community scale renewable energy and other regional significant infrastructure that contributes to reducing emissions.	Low: The operative provisions do include renewable provisions however, these provisions could be better aligned with national direction in the NPS-REG. They are the least directive of the three options and do not include consideration of emissions reductions through in consenting processes. Renewable energy development in the region have been generally limited despite these provisions being operative since 2013.	High: This option would provide a clearer signal to that large scale renewable energy developments (for example) are supported; by requiring provisions in plans. This option would provide for large scale generation directly supplying energy to the end user. This strong direction may also reduce consenting costs associated with this RSI. This option is the most likely to best support increasing employment and economic growth opportunities in the renewable energy sector and low emissions infrastructure providers in the region.
Social	Moderate: Energy plays a critical role in social well-being, powering social and community facilities and activities. The provisions would help improve some of the energy resilience issues for homes and communities. Social benefits would also accrue through actions to support emissions reductions,	Low: Lower benefit to society than options 2 and 3. There is some uptake in residential solar across the region this is low.	High: Similar to Option 1, however a higher benefit to people and communities is anticipated from a more aggressive policy stance for renewables; including greater energy resilience and reduced reliance on energy generated outside of the region and greater reduction in emissions from both the energy and other sectors.

	the social risks from climate change being significant. The provisions also focus on enabling small and community scale renewable electricity generation which will directly benefit households and contribute to the social well-being of communities.		
Cultural	Moderate: Climate change is a significant risk to cultural values. The provisions will support some emissions reductions, and may also better support iwi aspirations in relation to energy independence for mana whenua / tangata whenua and also better align with Te Ao Māori in relation to the use of resources.	Low: Benefits to mana whenua / tangata whenua have not been identified for the status quo.	Moderate: Same as for Option 1.
Effectiveness:			
How successful will you be in providing the outcome set by the objective?	The amendments for energy (Policy 11 and 39) overall enable a higher level of small and community scale renewable electricity development and low emissions RSI. The current policy has been operative since 2013. However, the scale of development or change in the built environment overall is small and more could be achieved in the coming years. The amended policies would enable more development of small and community scale solar, wind and marine energy. Policy 39(a) will expand the benefits of renewable energy and RSI developments where the benefits of the development will contribute to lowering	The status quo, while supportive of small scale renewable electricity and RSI, has not resulted in significant uptake of these activities in the region. It is therefore unlikely to advance the reduction in stationary energy emissions, and support emissions reductions from other sectors at the scale required to meet the objectives of the RPS. The status quo is therefore not an effective option.	The alternative option would clearly advance the development of large scale renewable energy infrastructure in the region, including generation connected directly to the end use. Requiring or directive provisions would ensure the policies are placed into district plans and a time requirement would promote support for development in renewables. Most territorial authorities have existing or proposed provisions that support renewables. These provisions would require greater support for a wider range of renewable energy infrastructure.

	emissions, which could improve consenting processes for these proposals. The RPS recognises the benefits of RSI in Policy 7 and 8, however, this amendment alongside the additions made to Policy 7 and 8 will specifically recognise the benefits of activities that reduce emissions. Overall, the amendments will strengthen the effectiveness of the existing policies to enable and promote more development of small scale and community scale renewables energy and low emissions RSI, and by doing so result in a reduction in greenhouse gas emissions.		
Efficiency:			
In being successful, will the net cost to society be low or the net benefit to society be high?	The costs of the preferred option are low. There is a positive benefit to society if the preferred option is adopted. The benefit will be in enhancing existing policy frameworks that already exist in district plans to promote small and community scale renewable energy. It will require consideration of emissions reductions from RSI during the consenting process, which will support these benefits to society to occur.	No new costs to society. District plans already give effect to the RPS. There is a net cost to society with retaining the status quo, as it is unlikely to advance the reduction in stationary energy emissions, and support emissions reductions from other sectors, at the scale required to meet the objectives of the RPS.	The costs of option 3 are low, however the benefits would potentially achieve the greatest benefit to society. Greater work would be required to identify exactly how this option would regulate and guide the development of large scale renewable energy generation. This option is likely to provide net benefit more quickly compared to other options.
Risks of acting or not acting if there is uncertain or insufficient information:	There is a low risk with the preferred option, as it will better support the reduction in stationary energy emissions, and support emissions reductions from other sectors, in line with the objectives of	The status quo has not resulted in significant uptake in small scale renewable energy or regionally significant renewable energy infrastructure. It is unlikely to advance the reduction in	Option 3 provides the greatest benefits and has similar costs as the preferred option.

	the RPS. However it is uncertain whether these provisions are sufficient to deliver the scale of new renewable electricity development and low emissions RSI that is required to meet these objectives.	stationary energy emissions, and support emissions reductions from other sectors, at the scale required to meet the objectives of the RPS.	There may however be some risk of adding a timeframe to a regional target for renewable electricity generation, however it is noted that such a target could instead be framed as being aspirational. It is uncertain whether this approach would be sufficient to deliver the scale of new renewable electricity development and low emissions RSI that is required to meet these objectives, however this option is most likely to achieve this outcome.
Overall evaluation	Overall, there is a low risk with the implementation of this package.. Having the supportive policy framework in place when new developments are proposed, will provide additional encouragement for energy developments that support the objective to lower greenhouse gas emissions. The preferred option doesn't however provide for large scale generation where it is directly connected to and supplies energy an end user or community. It is uncertain whether the preferred package will resolve energy resilience issues identified in the RPS or significantly reduce stationary energy emissions in the region.		

Climate change and industrial processes– Reducing greenhouse gas emissions

This policy package is part of a suite that contribute to achieving new Objective CC.3 to reduce net emissions by 50% from 2019 levels by 2030, with net zero by 2050.
Intent of this policy package: The Region's contribution to greenhouses gases from industry is approximately 4% of the total regional emissions. Emissions from industry are mostly in products and processes that are imported into New Zealand in the form of refrigerants foam blowing, fire extinguishers, aerosols, metered dose inhalers and sulphur hexafluoride for electrical insulation and equipment production. The policy package involves amendments to operative Policy 2 of the RPS relating for discharges into air, where greenhouse gas emissions are imbedded into the discharge of contaminants into air from industrial and trade processes, and in domestic home heating.

The intent of the amendments to Policy 2 is support industry to reduce greenhouse gas emissions from industrial processes. This is expected to translate into regulatory methods to avoid new discharges of greenhouse gas emission from industry, and to take steps to reduce greenhouse gas emissions from existing industrial discharges at the resource consent renewal stage. This approach is consistent with proposed national direction on greenhouse gas emissions from process heat which seeks to avoid new discharge from coal and phase out the use of fossil fuels in industrial process heat through reconsenting processes[154]. It is also aligned with, and supports, key actions in Chapter 11 (Energy and Industry) of the Emission Reduction Plan to ban new coal boilers, phase out existing boilers by 2037, and reduce reliance on fossil fuels in industry more generally[155].

Coal burning is proposed to be phased out by 2030 through the amendments to Policy 2. Burning coal in industrial boilers and in domestic fires releases CO2 and harmful pollutants[156] into the atmosphere, which causes air pollution (particularly in inland regional towns (such as Masterton)) and a detrimental effect on people's health and wellbeing. It is also the most emission intensive fossil fuel. The 2030 phase out date for coal is earlier than is proposed by central government in the proposed national direction on industrial process heat, but this is considered justified in the region for the reasons above and the fact it is already being phased out as a fuel by industry and households.

Proposal and alternatives are:

Policy package option 1 (preferred option): Amended policy 2 wording and related definitions as follows:

Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions – regional plans
Regional plans shall include policies, ~~and/or~~ rules and/or methods that:

(a) protect or enhance the *amenity values* of neighbouring areas from discharges of odour, smoke and dust; and

(b) protect people's health from discharges of dust, smoke and fine particulate matter; and

(c) support industry to reduce greenhouse gas *emissions* from industrial processes, and

(d) phase-out coal as a fuel source for *domestic fires* and large-scale generators by 2030.

Definitions for *domestic fires*, and *large-scale generators* have been added to support this policy proposal[157].

Policy package 2 (status quo): no change to Policy 2. GHG emissions from industrial processes would continue to be unregulated in the region.

[154] Refer to Ministry for the Environment webpage: Phasing out fossil fuels in process heat: national direction on industrial greenhouse gas emissions consultation document | Ministry for the Environment
[155] Emissions reduction plan | Ministry for the Environment
[156] Including fine particulate matter, sulphur dioxide and nitrogen oxides
[157] Definitions are consistent with NPS and NRP.

Policy package 3 (alternative with additional measures): require higher level of policy stringency over a shorter period to meet climate change objectives, such as phasing out coal in existing *large-scale generators* by 2025 and avoiding any new fossil fuel use in any *large-scale generators* or industrial processes generally.			
	Option 1 (Preferred – amend policy 2)	Option 2 (Status quo)	Option 3 (Alternative with additional measures)
Costs:			
Environmental	Nil. The amendments to Policy 2 will be more effective in status quo to reduce greenhouse gas emissions from industrial processes and phase out the use of coal in households and industry. As such, no environmental costs are anticipated from this Option. Coal burning as a fuel source is proposed to be phased out by 2030. This date aligns with the proposed climate change Objective CC.3 in this RPS to achieve a 50% reduction in emissions by 2030 (compared to 2019 levels) and achieve net-zero emissions by 2050.	Low - Moderate: The status quo will have environmental costs as greenhouse gas emissions from industry will continue to be unregulated in the region which will likely result in ongoing emissions (noting proposed national direction on industrial greenhouse gas emissions in development). This will not support the region meeting the emission reduction targets in Objective CC.3 by 2030. The status quo does not encourage the phasing out of domestic coal burners which contribute harmful pollutants to our air with associated health impacts.[158] Based on an estimate of 1 tonne of $PM_{2.5}$ emissions and 117.3 tonnes of CO2 emission from domestic coal burning per year in the Region, this has a damage cost of $622,756[159]. In the Wellington Region, 85% of all anthropogenic health costs in 2016	Nil. No environmental costs are anticipated from this Option as it more effective than the status quo and will be implemented in a shorter timeframe than Option 1.

[158] Regional emissions of PM2.5 from domestic coal burning are estimated to be 1 tonne per year based on 2018 census, assumptions about how much coal per year they burn plus an emissions factor established from Auckland data (100kg coal burnt per dwelling per year).
[159] Using damage cost for urban population density for PM2.5 from HAPINZ 2022 (based on 2019 costs) and NZTA manual for monmetised benefits and costs (Monetised benefits and costs manual | Waka Kotahi NZ Transport Agency (nzta.govt.nz). Damage costs are a value for changes in emissions to compare the benefits with the cost

		were contributed by motor vehicles and 30% by domestic fires.[160]	
Social	Low: there may be some initial costs for industry and Greater Wellington Regional Council to get up to speed with the new requirements and understand how to reduce greenhouse gas emissions in industrial processes. However, actual costs to the community are expected to be nil/negligible. Some potential social costs for households/communities to transition of coal burning but this also considered to be low as this transition is already underway.	Low: The status quo will not incur future costs for resource consent applicants, consent holders or households for the implementation of these policies.	Moderate: costs similar to Option 1 but are expected to be slightly higher for industry and households due to the requirement to change/transition in a shorter timeframe. This more stringent approach and shorter timeframe could place undue hardship on local communities that use coal as a fuel source or supplementary fuel.
Economic	Moderate: There will be increase in economic costs will be borne by the industry to investigate new technologies and developments to reduce greenhouse gas emissions as part of their industrial discharge. There will also be economic costs to phase out coal in industry in the region. However, the economic costs for industry over and above the status quo are expected to be minor given industry are already phasing out coal (and proposed national direction would likely	Low: The status quo will not incur future costs for resource consent applicants or householders for the implementation of these policies to reduce greenhouse gas emissions and phase out coal in the region.	Moderate-High: The economic costs for industry and households are the same as Option 1. However, the short-term economic impacts under this option are expected to be greater due to the requirement to change/transition in a shorter timeframe. This more stringent approach and timeframe would potentially result in high, short-term economic impacts for industry and

[160] HAPINZ 2022

	require this) and there are also efficiency gains for industry when reducing greenhouse gas emissions (energy efficiency etc.) The other main economic costs are for householders that have dedicated coal burning devices or require coal as the primary fuel source for heating or energy. Households relying on coal burning for heating is a relatively low occurrence in the region, with 2018 census[161] reporting 0.3% of households in the Region use coal for heating equating to 558 private occupied dwellings in Wellington. This compares to 1.3% nationally. Most burners can easy convert or already use substitute fuels such as wood or woody biomass fuels. However, these fuels are more expensive than coal and therefore may have impacts on lower socio-economic groups. The use of coal for home heating is assumed to be more concentrated in rural locations and towns with 0.6% of households in Masterton and South Wairarapa using coal for heating and 0.2% in Wellington City and Hutt City.		householders to quickly transition from using coal as a fuel.
Cultural:	Low: Mana whenua / tangata whenua acknowledge the reductions required for climate change but are also cognisant of	Low: Mana whenua / tangata whenua do not support the status quo and endorse the climate change	Low: as with Option 1, there is expected to low/no cultural costs from the amendments to Policy 2 as it

[161] Note the 2018 Census has data quality issues so a wide error margin existing in the domestic heating data.

	the effects on the local community and the need for this to be recognised. Overall, there is expected to low/no cultural costs from the amendments to Policy 2 as it seeks to reduce greenhouse gas emissions from industry and phase out coal which is aligned with national policy (proposed national direction and ERP).	amendments to reduce greenhouse gas emissions from industry and households. Continuation of the status quo therefore presents an ongoing cultural concern/cost for mana whenua / tangata whenua.	seeks to reduce greenhouse gas emissions from industry and phase out coal which is aligned with national policy (proposed national direction and ERP) and this general policy direction is supported by mana whenua / tangata whenua.
Benefits:			
Environmental	Moderate: Environmental benefits from modifications and enhancements to industrial processes to reduce greenhouse gas emissions. This is considered a medium to long term benefit in reducing emissions from the industrial sector. Environmental benefits from the clear direction to phase out coal in households and industry by a specified date that is more ambitious than proposed in national direction. Alternatives to coal can be more energy efficient, although the price of fuel may be higher. Phasing out coal in households has air quality and climate change benefits. Overall, the preferred option has the appropriate mix of provisions that will deliver environmental benefits through reducing greenhouse gas emissions and	Low: There is no environmental benefits in retaining the status quo. The operative provisions do include specific provisions to reduce greenhouse gas emissions in industry or phase out coal as the most emission-intensive fuel source.	High: Environment benefits are the same as anticipated under Option 1 but will be realised sooner and therefore more effective in contributing to the emission reduction targets in proposed Objective CC.3.

	reducing the discharge of harmful contaminants into air.		
Social	Low: Potential social benefits from the community being satisfied that climate change initiatives in the region are making progress towards New Zealand's overall reduction in emissions through improvements in industrial processes to reduce greenhouse gas emissions. There would be health benefits at a very local level as air quality improves for those in neighbourhoods which currently have operating coal burners. Greater Wellington Regional Council work on particle source apportionment has not detected a 'coal fingerprint' and is unlikely to detect through monitoring any reduction in particulate matter from banning coal across an airshed. However, this work also indicated here would very likely be a hyper local improvement in air quality at neighbourhood scale – if you happen to live next door to a coal burner.	Nil: There are no additional social benefits remaining with the status quo.	Low: Social benefits are the same as anticipated under Option 1. However, the more stringent approach and shorter timeframe to transition could result in less social benefits where there are difficulties/affordability issues for households.
Economic	Low: The new policy settings may provide future job opportunities for companies and individuals where industry seek to transition to more sustainable, profitable processes and fuel use. However, any economic and employment benefits over	Low: No additional economic benefit anticipated from retaining the status quo.	Moderate: the economic benefits are the same as anticipated under Option 1. However, the more stringent approach and shorter timeframe to transition may impact on the viability and operation of some industries in

	and above the status quo are expected to be minor. Economic benefits from reducing greenhouse gas emissions from industry and phasing out coal now – avoiding steeper and more costly reductions in the future.		the short-term reducing the overall benefits compared to Option 1.
Cultural	Low: Mana whenua / tangata whenua recognise the overall benefit of amendments to existing RPS policies to reduce greenhouse gas emissions to respond to climate change, while also acknowledging the costs to industry and households. This option is consistent with these views from mana whenua / tangata whenua and is expected to result in minor cultural benefits through reducing greenhouse emissions and helping support a fair transition to a low-emissions and climate-resilient region.	Nil: no cultural benefits for mana whenua / tangata whenua anticipated from retaining the status quo.	Low: Cultural benefits under this Option are the same as anticipated under Option 1.
Effectiveness:			
How successful will you be in providing the outcome set by the objective?	The proposed amendments to Policy 2 will ensure discharges into air from industry that contain or may discharge greenhouse gas emissions are regulated by plan rules in the NPF and reduced overtime in line with the emission reduction targets in proposed Objective CC.3. The amendments will effectively reduce industrial emissions over the medium to	The status quo will not advance a reduction in emissions from industrial processes. Policy 2 will continue not to address greenhouse gas emissions, and only be concerned with non-greenhouse gas contaminants. This is despite the RMA amendments to enable regional councils to regulate greenhouse gas emissions that come into effect on 30 November 2022. The status quo policy approach is not	Requiring further stringency in the provisions would accelerate the process to meet the emission reduction targets in proposed climate change Objective CC.3 and potentially be more effective in achieving the objectives that Option 1. However, there is some uncertainty about the feasibility, cost, and availability of technology in the region (and New Zealand) to make a more accelerated

	long term which currently contribute 4% of the emissions in the region. The phase-out of coal burning from industrial and domestic fires by 2030 is part of this policy package. The transition away from coal has been occurring for some time in the region and this policy further supports that transition. Coal burning in domestic settings still takes place in a small number of households (0.3% in the Wellington Region). In most circumstances, the coal burners are not coal only, and can substitute wood for coal or some other non-carbon fuel (i.e., pellets). While Policy 2(d) is stringent in terms of effectively phasing out coal as fuel source in the future, the 2030 date provides sufficient time for a transition to substitutes such as wood and woody biomass fuels. Overall, the proposed amendments to Policy 2 are considered to be effective to help meeting the proposed climate change objective, particularly objectives CC.1, CC.2 and CC.3.	working effectively towards a reduction in emissions and meeting the emission reduction targets in proposed Objective CC.3.	transition. This could also be contrary to Objective CC.2 to achieve fair and just transition. As such, this Option is not considered the most effective to achieve the objectives.
Efficiency:			
In being successful, will the net cost to society be low?	The preferred option will incur costs to some costs to society (industry and households) to transition to lower	There is no additional cost to society with the status quo option. Industry and households are expected to	There could be a considerable additional cost to society (industry and households) with the alternative

	emission sources of fuel. However, the overall costs to society are low.	continue to phase out coal under the status quo, just at reduced rate compared to Option 1.	option to phase out coal within shorter timeframe.
In being successful, will the net benefit to society be high?	The overall costs to society are low compared to long-term benefits for current and future generations associated with the proposed policy package.	There is no additional benefit to society with the status quo option. Industry and households are expected to continue to phase out coal under the status quo, just at reduced rate compared to Option 1.	There are limited benefits in terms of reducing overall emissions from industry compared to Option 1. As such it is not assessed as being the most efficient option.
Risks of acting or not acting if there is uncertain or insufficient information:	There is sufficient information in acting with the provisions. The proposed amendments are aligned with proposed national direction relating to industrial greenhouse gas emission, actions in the Emission Reduction Plan relating to industry and energy, and are consistent with steps that industry and households are already taking to phase out coal as a fuel source and reduce greenhouse gas emissions.	N/A	It is considered that there is sufficient information in acting with the provisions for the same reasons as outlined for Option 1. However, the more stringent approach and shorter timeframe to transition presents greater risks to the viability and operation of some industries.
Overall evaluation	Overall, the proposed amendments to operative Policy 2 will be effective and efficient to achieve the proposed climate change objectives. The amendments will assist in achieving the emission reduction targets in Objective CC.3 and achieve a fair transition that does not impose unreasonable costs on industry or households using coal. The proposed amendments are also aligned with proposed national direction, actions in the Emission Reduction Plan, and is also consistent with steps that industry and households are already taking to phase out coal and reduce greenhouse gas emissions.		

Climate change and enhancing sinks (nature-based solutions)

This policy package is to achieve <u>New Objective CC.4:</u>

Nature-based solutions are an integral part of *climate change mitigation* and *adaptation*, improving the health and resilience of people, biodiversity, and the natural environment.

Intent of this policy package:
The aim of this policy package is to increase the use of natural and modified ecosystems to both mitigate and adapt to climate change, providing co-benefits for the health of people and the natural world. Protecting and restoring the health of natural ecosystems is also critical to ensure that they are resilient and can continue to provide the range of ecosystem services, such as carbon sequestration and storage, natural hazard mitigation, and the provision of food and amenity, that support our lives and livelihoods, while also working to reverse the serious decline in indigenous biodiversity in New Zealand described in "Biodiversity in Aotearoa - an overview of state, trends and pressures" the background report for the national biodiversity strategy Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy.[162] The policy package will give effect to Objective 13 of this strategy that "Biodiversity provides nature-based solutions to climate change and is resilient to its effects". The policy package is also consistent with the ERP: "*Planning and infrastructure systems work with nature to support biodiversity, enable green and blue infrastructure, sequester carbon and manage the effects of a changing climate*"[163].

Policy package option 1 (preferred): The package includes two policy groupings:

(a) Policies CC.7, CC.12, Methods CC.6 and CC.9: These provisions seek to identify and to protect, enhance, restore, and create, nature-based solutions to climate change within the region, including those that provide carbon sequestration, resilience to people, and resilience to nature. These policies would be supported by a new regional programme to identify priorities for protection and restoration and acquire new funding packages to secure their protection
(b) To promote and support an increased area of forest to contribute to the recommendation of the Climate Change Commission; directing "right tree-right place", seeking multiple benefits for carbon sequestration, biodiversity and fresh water, and giving effect to Te Mana o te Wai and Te Rito o te Harakeke. The policies are supported by preparation of a regional forest spatial plan (Policies CC.6, CC.18, Method CC.4).

Policy package option 2: Status Quo - There are no provisions in the RPS that recognise the value of natural systems for climate change mitigation or adaptation or that address climate change alongside the decline of indigenous biodiversity. BAU includes existing planting and restoration programmes that are supported by Greater Wellington, e.g., the hill country erosion programme and the significant restoration programme underway within Greater Wellington regional parks.

BAU also includes the increase in plantation forest being incentivised by the Emissions Trading Scheme.

Policy package option 3: A more active package incorporates Option 1 plus some very limited add-ons to define species to be planted for "carbon sequestration forest planting" and identify specific areas that should be indigenous only.

[162] Biodiversity in Aotearoa - an overview of state, trends and pressures (doc.govt.nz)
[163] Aotearoa New Zealand's first emissions reduction plan.

	Option 1 (Proposed policies and methods)	Option 2 (Status quo)	Option 3 (Alternative with additional measures)
Costs:			
Environmental	Nil. There are no obvious environmental costs to this option.	Medium. Ecosystems and habitats that provide, or have the potential to provide, significant benefits for climate change mitigation and/or adaptation risk ongoing levels of degradation.	Nil. There are no obvious environmental costs to this option.
Social	Low. The primary approach to ecosystem/habitat protection is non-regulatory, with Method CC.9 looking to provide support and incentives for protection/ restoration initiatives, recognising value for the wider community.	Med-High long-term cost to the community and environment from not pursuing opportunities to secure climate change mitigation/adaptation or to protect indigenous biodiversity.	Low-Medium. The technical work to support this Option has not been carried out so if it is incorporated without this detail there could be landowner and community costs from establishing inappropriate requirements.
Economic	Low-Medium depending on the scale of funding required to secure protection/restoration. May be an opportunity cost for foresters/landowners associated with restricting species choices. Except for a major land purchase to secure protection or restoration of a significant nature-based solution, even an ambitious increase in funding to secure protection of significant nature-based solutions is likely to be small compared to other Council programmes.	Low economic cost to landowners.	Low-Medium. May be an opportunity cost for foresters/landowners associated with restricting species choices.
Cultural	Low. Cultural values better recognised than under the status quo. The cultural costs of this option are expected to be negligible.	Medium-high. This option fails to recognise, and therefore protect/restore, the cultural values associated with natural systems.	Low. Cultural values better recognised than under the status quo. The cultural costs of this option are expected to be negligible.

Benefits:			
Environmental	Medium-High. This option would lead to the increased protection/restoration/ and expansion of natural and modified ecosystems in both urban and rural environments, with benefits for climate change mitigation and/or adaptation, as well as benefits for indigenous biodiversity, ecosystem resilience and ecosystem services.	Low-medium. Depends on Policy 16 to protect ecosystems and habitats identified for their significant biodiversity values and existing Greater Wellington restoration programmes – in some situations this will have co-benefits for climate change mitigation/adaptation, but these will be incidental rather than deliberate.	Medium-High. This option would lead to the increased protection/restoration/ and expansion of natural and modified ecosystems in both urban and rural environments, with benefits for climate change mitigation and/or adaptation, as well as benefits for indigenous biodiversity, ecosystem resilience and ecosystem services. It is noted that some types of nature-based solutions will have greater biodiversity benefits than others. Some more detailed direction could lead to slightly better environmental outcomes, but this would need to be based on sound technical justification.
Social	Medium-High. Nature-based solutions by definition provide benefits for both people and nature. This proactive and funded approach has a high likelihood of achieving significant social benefits by mitigating climate change (e.g., reducing greenhouse gas emissions) and providing resilience to people (e.g., protection from rising sea-levels, stabilising erosion prone land) and resilience to nature (enabling ecosystems to persist, with all the co-benefits this brings to society).	Low. There will be some co-benefits to the community from the protection of ecosystems and habitats just for their indigenous biodiversity values, but without a specific climate change focused lens, these benefits will be limited.	Medium-High. Nature-based solutions by definition provide benefits for both people and nature. This proactive and funded approach has a high likelihood of achieving significant social benefits by mitigating climate change (e.g., reducing greenhouse gas emissions) and providing resilience to people (e.g., protection from rising sea-levels) and resilience to nature (enabling ecosystems to persist, with all the co-benefits this brings to society).
Economic	Medium-High. Nature-based solutions offer significant benefits to avoid climate change	Low, as above there will be some co-benefits from protecting ecosystems	Medium-High. As with option 1, nature-based solutions offer significant

	impacts and the associated costs. E.g., reducing the impacts of increased coastal, pluvial and fluvial flooding by stabilising the land, storing water and buffering land uses from these processes.	and habitats just for their indigenous biodiversity values, but without a specific climate change focused lens, these benefits will be limited.	benefits to avoid climate change impacts and the associated costs. There may also be increased opportunities for associated economic endeavours e.g., tourism and reforestation initiatives.
Cultural	Medium-High. Protecting and restoring indigenous ecosystems for their climate change benefits will provide concurrent benefits for protecting and restoring their cultural values. Method 32 recognises the importance of partnering with mana whenua / tangata whenua to identify significant opportunities for nature-based solutions, which will incorporate consideration of their contribution to enhancing cultural values.	Low. Little recognition of the wider cultural values of indigenous biodiversity aside from the mana whenua / tangata whenua criterion for determining significance under Policy 23.	Medium-High. Protecting and restoring indigenous ecosystems for their climate change benefits will provide concurrent benefits for protecting and restoring their cultural values. Method CC.8 recognises the importance of partnering with mana whenua / tangata whenua to identify significant opportunities for nature-based solutions, which will incorporate consideration of their contribution to enhancing cultural values. This option might result in greater restoration of indigenous ecosystems than Option 1, as it would be regulated that specific areas must be identified as indigenous only.
Effectiveness:			
How successful will you be in providing the outcome set by the objective?	This option will likely meet its objectives. New policies and methods are targeted at resolving the environmental issues identified.	This option is unlikely to meet its objective. As noted for the Indigenous Ecosystems chapter, existing methods to protect and restore indigenous ecosystems have been insufficient to resolve the environmental issues they are targeted at. Without a specific	This option will likely meet its objectives. New policies and methods are targeted at resolving the environmental issues identified.

		climate-change lens, the existing policies will not be effective to achieve Objective CC.8.	
Efficiency:			
Will the option contribute to achieving the objective at the lowest total cost to all members of society?	While there will be costs to develop a proactive and targeted approach to identify and then pursue the protection, restoration and/or enhancement of nature-based solutions, these are considered to be low while the benefits will be medium-high.	Continuing with the status quo will have significant long-term costs to society and will not achieve the objective (it was not designed to do so).	Option 3 has a higher net cost as additional work to properly design and implement Option 3 needs to be undertaken (and has not been at this stage).
In being successful, will the net benefit to society be high?	Nature-based solutions by definition provide benefits for both people and nature with the value of providing climate change mitigation and/or adaptation outweighing the costs.	The status quo does not support the potential benefits of nature-based solutions. There would be no net benefit.	Nature-based solutions by definition provide benefits for both people and nature with the value of providing climate change mitigation and/or adaptation outweighing the costs. Some more detailed direction could lead to slightly better outcomes but there is lower net benefit with this option, as the sound technical justification required has not yet been completed.
Risks of acting or not acting if there is uncertain or insufficient information:	The overall threat to the Wellington region from climate change is well established, as are the multiple-benefits of nature-based solutions. The risk of not acting is very high as the Wellington region needs to look for all opportunities to reduce its greenhouse gas emissions and provide protection to its communities from the unavoidable impacts of climate change, which are already being felt in the region. In addition, given global efforts to act on climate change are being implemented to varying timeframes and at varying rates of success, it is not certain that global warming will be limited to 1.5 degrees Celsius, further elevating the need for action. There is sufficient information, and direction in international and national policy, to act in this current RPS Change.		
Overall evaluation	Overall, Option 1 provides the most efficient and effective means of achieving the objective. The option reaches the right balance in taking a strong proactive approach to identify nature-based solutions that will provide significant benefits for the region, supported by a predominantly non-regulatory policy package to actively promote, support and incentivise the implementation of these. The status-quo approach will not achieve the objective as it does not seek to do so.		

	The proposed approach gives effect to national direction in the ANZBS, exposure draft NPS-IB, the National Adaptation Plan and National Emissions Reduction Plan and international best practice. As noted in the National Emissions Reduction Plan, "*The climate and biodiversity crises are inextricably linked. Aligning work on climate change and biodiversity is an opportunity to take strong action in both areas. This approach will ensure our response to the climate crisis also improves the resilience of our native ecosystems and does not further their destruction."* When combined with the proposed amendments to the Indigenous Ecosystems chapter, the proposed amendments recognise and further incentivise the contributions of mana whenua / tangata whenua, landowners and community members in regional biodiversity protection.

Climate change and natural hazards, adaptation and resilience

This policy package is to achieve the amended objectives 19, 20 and 21 and new objective CC.6 to give better effect to national direction and risk-based natural hazards planning guidance that has been released since 2013.
Intent of this policy package: The policy package in intended to put in place a clearer framework for implementing an environmentally, socially and culturally integrated risk-based approach for hazard management and adaptation planning. This involves identifying areas subject to natural hazards and assessing the level of risk and developing provisions to appropriately manage that risk. This approach gives effect to national and regional direction. It aims to provide consistency in natural hazard provisions in regional and district planning instruments and in the development of hazard risk management and climate change adaptation plans. It also aims to encourage better integrated management of natural hazard mitigation activities.
Policy package option 1 (preferred) – new and amended policies: Proposed amendments to Policy 29, 51 & 52 to: • Identify all areas affected by natural hazards, not just high hazard areas; • Use a risk-based approach to assess the consequences from natural hazard events to subdivision, use and development, including allowances for climate change over the next 100 years; • Manage the risks where they are assessed as low to moderate and avoid subdivision, use and development and *hazard sensitive activities* where the risks are assessed as high to extreme; • Consider whether non-structural, or soft engineering, *green infrastructure* or Mātauranga Māori options provide a more suitably appropriate or innovative solutions to hazard mitigation; • Consider the long term viability of maintaining the structural protection works with particular regard to how climate change may change the risk over time;

- Consider the adverse effects on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, or the local ecosystem and biodiversity from hard engineered mitigation works.

New policies

- New Policy CC.4: Environmental integration in urban development including a consideration of water sensitive urban design.
- New Policy CC.5: Reducing agricultural gross greenhouse gas emissions and increasing rural resilience to climate change including promoting land management practices that will provide resilience to the effects of climate change and achieve co-benefits for indigenous biodiversity, fresh and coastal water.
- New Policy CC.14: Climate resilient urban environments that promotes nature-based solutions.
- Policy FW.5: Water supply planning for climate change and urban development.
- FW.8: Land use adaptation policy that promote consideration of climate change impacts on water supply and water resilience planning.
- New Policy CC.16: Climate change adaptation strategies that local authorities should undertake for strategic climate change adaptation programmes that engage local communities in the decision making process to map out management options over short, medium and long term timeframes.
- New Policy CC.17: Iwi climate change adaptation plans that direct the regional council to assist mana whenua / tangata whenua in the development of iwi-led climate change adaptation strategies.

Policy package option 2 (status quo): Maintain existing policies.

No other options: All alternatives considered have been incorporated into the preferred option. No alternative options are considered feasible.

	Option 1 (Preferred amendments)	Option 2 (Status quo)
Costs:		
Environmental	Low environmental costs. Promotes integration of environmental values into planning and decision making for hazards management and resilience in urban design, water and land use and provides a stronger direction to rezone development in high hazard areas that could open up areas for long term restoration of the environment.	Future impacts on the environment from hazard mitigation measures and poor land use decision making that does not account for changes in the climate that leads to greater impacts from hazard events, damage to land, property and infrastructure. Lack of water security from poorly managed water resources and lack of recognition of the changes this will bring to water supply. Some of these impacts are being felt now and are imposing costs due to loss of ecosystem services.
Social	Low impacts and costs on the community and social cohesion as a result of building community resilience to the impacts from climate change and natural hazards. Reduced impacts on mental	The social costs from a failure to fully recognise the impacts from climate change, natural hazards and water insecurity will reduce community cohesion, mental health and well-being

	health and well-being from better decision making that moves communities away from high hazard areas subject to major natural disasters and the long term financial impacts that this has in terms of recovery, insurance and withdrawal of businesses and capital lending. Some short term social costs as people and communities come to terms with the changes that will be required to adjust to a new planning framework that takes into account future changes and uncertainty.	outcomes and impose costs that will be carried by the next generation due to a failure to make decisions about the scale and location of new development and not undertake long term adaptation planning in both rural and urban environments. These costs are unavoidable and will increase if they are delayed to future generations.
Economic	Increased shorter term costs to councils to develop longer term strategies and undertake more robust community consultation. Some costs to developers to be more innovative in design of infrastructure or modification of plans to have lower environmental impacts or avoiding development in sensitive areas. This may result in some short to medium costs to implement these approaches in plans and on the ground. Some land may need to be identified for rezoning or removed from production to allow environmental enhancement or restoration programmes. No effects on economic growth or employment are anticipated.	The economic costs in terms of disaster response and recovery, increases in rates and taxes to pay for ongoing hazard impacts, insurance withdrawal, business continuity, bank lending hesitancy will directly impact local economies and have long term impacts that will be borne by future generations. Large costs will be borne by the community, business and government by not planning for changes that will affect water and food security, and instead being forced to repeatedly react under emergency conditions to events such as drought.
Cultural	Low cultural costs resulting from adaptation strategies affecting sites of significance and Māori land close to the coast. Decisions that allow nature to take its course rather than spending money on mitigation works may result in the loss of some sites of significance. For example, by choosing to not build a seawall on an eroding shoreline that could protect a significant site in order to prevent impacts on mahinga kai.	The costs of poor adaptation planning and development are already impacting mana whenua / tangata whenua and will only worsen if no change is made to the status quo.
Benefits:		
Environmental	It addresses the integration of environmental values, addresses long term planning and will provide longer term benefits for the	The existing provisions go some way to addressing the impacts from hazard mitigation measures, but only partially

	environment. Options for existing and new development will provide environmental benefit in an integrated manner.	fulfil newer national direction and ongoing impacts on the environment.
Social	The option promotes long term planning from the risks of hazards exacerbated by climate change, and the statutory tools to help manage impacts on the community from natural disaster and the costs they bring in the form of damages, insurance and the costs of recovery, including social disruption, loss of community cohesion and mental health and well-being.	The current provisions provide a measure of longer term planning but only partially addresses long term social consequences from climate change that is required to reduce future effects on the community.
Economic	It promotes long term planning from the risks of hazards exacerbated by climate change, and provides statutory tools to give effect to national direction that will help reduce the long term economic impacts on existing and new development, the community and businesses from natural disasters, recovery and insurance costs.	The existing provisions partially recognise the costs from natural hazards but don't fully address longer term impacts from climate change and sea level rise.
Cultural	The option addresses incorporation of mana whenua / tangata whenua values; Mātauranga Māori, Te Mana o te Wai or Te Rito o te Harakeke, and provides the statutory tools to address longer term impacts that development may have on these values.	Currently very few cultural benefits. Some environmental considerations also cross over to cultural values but it does not address mana whenua / tangata whenua values; Mātauranga Māori, Te Mana o te Wai or Te Rito o te Harakeke.
Effectiveness:		
How successful will you be in providing the outcome set by the objective?	This preferred option aligns with MfE produced guidance[164] on risk-based approaches for hazards management and adaptation planning and integrates hazard risk management decision making to include other important values. It addresses the integration of environmental values and addresses long term planning.	The existing provisions give partial statutory effect to the RMA and NZCPS, but more recent guidance provides new methods for implementing adaptive and risk based approaches. The existing provisions go some way to addressing the impacts from hazard mitigation measures.
Efficiency:		

[164] Risk Based Approach to Natural Hazards under the RMA. Prepared for Ministry for the Environment by Tonkin & Taylor Ltd, June 2016. https://environment.govt.nz/publications/risk-based-approach-to-natural-hazards-under-the-rma/

In being successful, will the net cost to society be low?	Yes. In the medium to longer term the net cost will be low, but there will be higher costs in the short term in establishing and implementing a more directive framework.	No, maintaining status quo will result in high costs socially, economically, environmentally and culturally. Failure to adapt to the impacts of climate change and sea level rise that will exacerbate natural hazards and cause large increased costs in responding to and recovering from natural disasters, insurance and lending withdrawal, loss of social cohesion, lack of business continuity and increasing governance difficulties as communities struggle to cope and adapt to climatic changes.
In being successful, will the net benefit to society be high?	Yes, in the long term the net benefit will be significantly higher than maintaining status quo.	Yes in the short term, maintaining the status quo will be efficient, but the long term costs will become intolerable as natural hazards are not managed in an appropriate or integrated way, and these longer term cost will far outweigh any short term benefit.
Risks of acting or not acting if there is uncertain or insufficient information:	There is ample and abundant information to act now to adapt to the impacts from climate change and sea level rise and of the benefits provided by environmental protection and restoration and nature based solutions to hazard and climate change mitigation. The risks of not acting far outweigh the risks of acting.	
Overall evaluation	There is a significant justification for a stronger policy framework to provide direction to adapt to the impacts of climate change and sea level rise that will exacerbate natural hazards and cause large increased costs in responding to and recovering from natural disasters, and increasing difficulties for communities to adapt to climatic changes. There are costs associated with the preferred option in the short term and longer term benefits. The risks of not acting are low to moderate in the short term and very high in the long term. The preferred option is considered an efficient and effective option to achieve the objective and implement national direction to improve resilience and adaptation.	

Natural character of the Coastal Environment evaluation – efficiency and effectiveness of provisions

Natural character
This policy package is to achieve alignment with the NZCPS

Intent of this policy package: To ensure the RPS policy approach for natural character in the coastal environment is consistent with the NZCPS

Policy option 1 (preferred): To amend Policy 3, by deleting Policy 3(c) (social values as part of assessment of natural character) and retaining all other parts of the Policy. A minor text correction is also included as shown below in (b).

Policy 3: District and regional plans shall include policies, rules and/or methods to protect high natural character in the *coastal environment* from inappropriate subdivision, development and/or use. Natural character should be assessed considering the following matters, with a site determined as having high natural character when the landscape is slightly modified or unmodified, the land-cover is dominated by indigenous vegetation and/or the vegetation cover is natural and there are no apparent buildings, structures or infrastructure:

(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~~ water forms, 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.

~~(c) Social values: the place, site or area has meaning for a particular community or communities, including:~~

~~(i) sentimental: the natural character of a place, site or area has a strong or special association with a particular community; and/or~~

~~(ii) recognition: the place, site or area is held in high public esteem for its natural character value, or its contribution to the sense of identity of a particular community.~~

Policy option 2 (Status quo): To retain current Policy 3 of the RPS		
	Option 1 (Preferred - Amend Policy 3)	Option 2 (Status quo)
Costs:		
Environmental, Economic Social, and Cultural	No costs of option 1 have been identified given it is as expected by the NZCPS.	Given the status quo does not give effect to NZCPS Policy 13, if local authorities consider social values in the methodology to identify high natural character ratings, they will likely incur financial costs in the assessment methodology. The status quo will also have environmental costs, as natural character will not be assessed (and therefore protected) in accordance with the environmental values prescribed by NZCPS Policy 13. In implementation of the status quo, there is the risk of areas being inaccurately identified, and community being unreasonably engaged, with associated social costs as local authorities may not be able to support this in subsequent decision making, despite community involvement or expectation in the assessment methodology.
Benefits:		
Environmental, Economic Social, and Cultural	Removing the requirement to consider social values may reduce costs on local authorities in assessment approach and thus deliver small economic benefits. Environmental benefits are expected consistent with the national direction from NZCPS Policy 13. The potential for these benefits will be improved as the policy will be consistent with expected approach in the NZCPS. Overall benefit will be marginal as the amendment will primarily provide consistency with what is expected assessment approach in the NZCPS.	There is potential social and cultural benefit in the process and results of identifying social values in the costal environment, including anticipated community engagement in this process. However, there is risk the benefit may not be realised as the national direction (and current practice) does not support this component of natural character.
Effectiveness:		

How successful will you be in providing the outcome set by the objective (the purpose of the amendment in this case)?	The preferred approach will achieve the outcome sought by the RPS by giving effect to NZCPS Policy 13. The NZCPS is taken to provide effective direction in response to resource management issues.	The status quo will not achieve the objective, given it does not give effect to the direction of NZCPS Policy 13.
Efficiency:		
In being successful, will the net cost to society be low?	Given the preferred approach means that the RPS will implement the direction in the NZCPS, the net cost to society will be minimal.	Given the status quo requires social values to be determined and then subsequently incorporated into the methodology to assess and therefore identify areas of high natural character, there is a net financial cost. The net cost is notable as it may not be able to be reasonably implemented given the direction of the NZCPS.
In being successful, will the net benefit to society be high?	The preferred approach will provide for natural character to be assessed in accordance with national direction, and high natural character areas appropriately protected. Net benefit will be minimal as the NZCPS already anticipates protection in accordance with the proposed amendment.	The status quo will provide for natural character to be assessed and protected. This may include additional benefit if social values are successfully identified and protected.
Risks of acting or not acting if there is uncertain or insufficient information:	No risks have been identified. There is certainty provided in the NZCPS.	
Overall evaluation	The amendment will be efficient and clear in achieving consistency with the NZCPS for assessment of natural character in the coastal environment.	

Te Mana of Te Wai evaluation – efficiency and effectiveness of provisions

This policy package is to achieve Objective 12 and separate statements of Te Mana o te Wai expressions of Kahungunu ki Wairarapa and Rangitāne o Wairarapa
Intent of this policy package: Ensure policies and methods give effect to NPS-FM, align with the Te Mana o te Wai objective and expressions of mana whenua / tangata whenua, and give adequate direction to regional and district plans
Policy package option 1: Changes and additions to freshwater related policies and methods as follows

These changes would introduce changes to the RPS to implement the new objectives required by the NPS-FM and ensure the RPS policies and methods are aligned to the outcomes of the whaitua processes, the Te Mana o te Wai expressions of mana whenua / tangata whenua, and support the changes to the NRP to come for giving effect to the NPS-FM.

Policy 12: Management ~~purposes for~~ of surface water bodies – regional plans

~~Policy 13: Allocating water – regional plans~~ (Now covered by Policy 12)

Policy FW.3: Urban development effects on freshwater – district plans

Policy FW.4: Financial contributions for urban development – district plans

Policy 14: Urban development effects on freshwater and the coastal marine area ~~Minimising contamination in stormwater from new development~~ – regional plans

Policy 15: ~~Minimising~~ Managing the effects of earthworks and vegetation disturbance – district and regional plans

Policy 17: ~~Water allocation~~ Take and use of water for the health needs of people – regional plans

Policy 18: Protecting and restoring ~~aquatic~~ ecological ~~function~~ health of water bodies – regional plans

Amended Policy 40: ~~Maintaining~~ Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems ~~aquatic ecosystem health in water bodies~~ – consideration

Amended Policy 42: Effects on freshwater and the *coastal marine area* from urban development – consideration ~~Minimising contamination in stormwater from development – consideration~~

~~Policy 43: Protecting aquatic ecological function of water bodies – consideration~~ (Deleted)

New Policy FW.5: Water supply planning for climate change and urban development – consideration

New Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater

Amended Policy 44: Managing water take~~s~~ and use to give effect to Te Mana o te Wai ~~ensure efficient use~~ – consideration

Method FW.2: Joint processing urban development consents

Method IM.1: Integrated management - ki uta ki tai

Method FW 1: Action Plans

Method 34: Prepare a regional water supply strategy

Method 48: ~~Investigate the use of transferable water permits~~ Water allocation policy review **Policy package option 2: No Changes to RPS (status quo)** **Policy package option 3: Changes restricted to new objectives required by the NPS-FM (Te Mana o te Wai and freshwater visions), being the compulsory change, and no changes to policies and methods**			
	Option 1 (Preferred)	Option 2 (Status quo)	Option 3 (Alternative NPS-FM minimum)
Costs:			
Environmental	Low: The environment will be enhanced. The setting of limits and the use of action plans will halt degradation and improve environments. Localised degradation will occur in new greenfield urban developments but these will be offset by improvements in the existing urban footprint. The Whaitua reports (to be included in changes to the NRP) set out the extent of improvements.	High: The freshwater environment will have insufficient protection which will like result in it continuing to degrade. The status quo does not appropriately integrate a response to both freshwater management and urban development, does not achieve the objectives and statements of mana whenua / tangata whenua (see Section 8) and does not implement the NPS-FM.	Medium: The freshwater environment will continue to degrade. The degradation is described in Section 3 with reference to the Whaitua reports and Greater Wellington Regional Council monitoring results. The minimum option does not achieve the objectives and statements of mana whenua / tangata whenua (see Section 8) with any certainty.
Social	Low Social inequity issues are mitigated, in the short term. However, the costs of significant environmental improvement will still lie with future generations	High: Social inequity issues are considerable. Freshwater degradation can have impacts on downstream values and uses, not always the location or use causing the degradation. In addition, the cost of remediating environmental damage in the future does not lie with those directly causing it, but largely falls on future generations as a cost for the wider community. The status quo does not appropriately integrate a response to both freshwater management and urban development	High: Similar to Option 2

Economic	Medium: The costs of the whole freshwater package is considerable (in the order of hundreds of million dollars, the cost of wastewater infrastructure improvements are in this order alone), and will lie with regional and district councils, resource users and the whole community. This cost is largely driven by national direction, including national bottom lines, and the new requirement to put waterbodies first (Te Mana o Te Wai). This costs is not a result of Change 1, but rather related directly to the national direction. Change 1 would add some additional cost in local application. However, this cost can be spread out over decades. The whaitua reports signal the timeframes over which improvements must occur. This is highly variable and range from the very short term to over 50 years. These timeframes are required not just to mitigate cost on the community, but also the time it takes to physically undertake the work. The total cost and where and when these costs lie will be determined through regional plan changes (and to a lesser extent district plans). The changes are required by the NPS-FM. The government considered the costs of implementing the NPS-FM and determined that the benefits outweighed the costs.[165]	Low in short term, high in long term The cost of the status quo is significantly less that Option 1. However, the costs for generations to come will be high, evidenced by current 3 water infrastructure spend. Several generations of low rates means that the current and future generations will pay.	Medium: The cost is potentially the same as Option 1, but the costs are more uncertain in terms of total cost and where the costs might lie.

[165] See Section 5 for description of the NPS-FM and references to the regulatory impact statement.

Cultural	Low: While the aspirations of mana whenua / tangata whenua are not currently being met, improvements over time in the environment, and improved levels of involvement in decision making by mana whenua / tangata whenua mean that these aspirations will be met over time. This partnership approach will involve additional commitment from mana whenua / tangata whenua.	High: Aspirations of mana whenua / tangata whenua, including those set out in the statements of Te Mana o te Wai expressions (see Section 8) are not met. The NPS-FM expectations of partnership and cultural outcomes would not be achieved.	Medium: While mana whenua / tangata whenua have articulated their aspirations in relation to Te Mana o te Wai and freshwater visions, the lack of policies to achieve these means their aspirations will take longer to be met, or may not be met
Benefits:			
Environmental	High: The NPS-FM was introduced to address significant freshwater degradation. The package outlines freshwater visions and the pathway to achieve these visions. Integrated approaches have the potential to gain more benefits at less cost. Implementing a freshwater policy package as anticipated after extensive whaitua processes, and partnering with mana whenua / tangata whenua to articulate Te Mana o te Wai objectives, provides the benefit of a targeted and informed environmental response.	Low: Benefits are minor and localised	Low: While the long-term goals are set (freshwater visions), the means of achieving them are not. Benefits would occur in the longer term with a slower pace of degradation. The lack of clarity in how the objectives are achieved means they may take longer to be met, or may not be met.
Social	Medium- High: This option is the most equitable. Reduced sewage overflows reduce risk of human health issues. Reduced stormwater flooding has positive impact on communities.	Low: impacts from sewage overflows and stormwater flooding continue to impact communities from time to time.	Low: impacts from sewage overflows and stormwater flooding continue to impact communities from time to time.
Economic	Low-Medium: Integrated solutions between agencies and across areas of resource management (fresh water, climate change	Low	Low: This options outlines long term goals but is silent on how to achieve these. This creates uncertainty. Any

	and biodiversity) have the potential to save costs and provide better outcomes. The costs will lie more equitably in that they will lie with those potentially degrading fresh water. However, some of the costs for restoration will lie with the wider community.		economic benefits will be similarly uncertain.
Cultural	High: Aspirations of mana whenua / tangata whenua are more likely to be met with a clear set of policies aligned to recommendations of the whaitua processes and to implement the objectives and statements of Te Mana o te Wai expression (see Section 8). The policies provide clearer direction for implementation through regional and district plans, providing more certainty in approach and outcomes across resource management.	Low: Greater Wellington Regional Council has a partnership approach with mana whenua / tangata whenua, and will continue to implement recommendations of the whaitua process. This will result in benefits, more so in the future through the regional plan changes to come. However the level of benefits is low compared to option 1 and would not adequately achieve the aspirations of mana whenua / tangata whenua, including those set out in the statements of Te Mana o te Wai expressions (see Section 8).	Low: mana whenua / tangata whenua have articulated their aspirations for Te Mana o te Wai thought the visions, however this option provides little certainty in implementation so the benefits are low. The Greater Wellington Regional Council partnership with mana whenua / tangata whenua will continue including implementing recommendations of the whaitua process, but the benefits are low compared to option 1 due to uncertainty in adequate achievement of the statements of Te Mana o te Wai expressions (see Section 8).
Effectiveness:			
How successful will you be in providing the outcome set by the objective?	The NPS-FM is very prescriptive in the process to be followed for managing fresh water. If followed it will be successful.	Not successful. Freshwater degradation will continue.	The outcome is much less certain without the detail of how to achieve the objectives.
Efficiency:			
In being successful, will the net cost to society be low?	Yes, costs additional to the NPS-FM (already accounted for) will be low.	No, costs of the status quo continuing will be high (particularly environmental and cultural costs).	Yes but is much more uncertain than the preferred option.

In being successful, will the net benefit to society be high?	Yes, benefits are more certain and aligned to the whaitua outcomes.	No, costs will outweigh the benefits.	Yes but is much more uncertain than the preferred option.
Risks of acting or not acting if there is uncertain or insufficient information:	For Options 1 and 2 there is sufficient information and the costs of not acting now are well known. Option 3 relies on regional and district plans implementing the NPS-FM without further guidance from the RPS. The outcome is uncertain, and does not fully give effect to the NPS-FM.		
Overall evaluation	There is a net overall benefit with either the preferred option or alternative option. The NPS-FM was introduced to halt and then reverse the degradation of fresh water. This change is part of achieving the purpose of the NPS-FM and also achieving the expectations of the whaitua processes. The preferred option will provide the most certainty, effectiveness and efficiency in achieving the outcomes sought in the NPS-FM. The initial costs will be high, but as anticipated by the NPS-FM and less than the long-term costs of doing nothing. Doing nothing creates significant inter-generational inequity, with future generations facing the cost of restoration.		

Indigenous ecosystems evaluation – efficiency and effectiveness of provisions

This policy package is to achieve amended Objective 16, and new objectives 16A, 16B and 16C
Intent of this policy package: The aim of this suite of policies and methods is to recognise in RMA planning and decision making that indigenous ecosystems and habitats have values that are broader than just for significant biodiversity, to strengthen the direction to identify and protect significant indigenous biodiversity, to provide greater direction to protect, maintain and restore all indigenous biodiversity in the region, and to better recognise and support the roles of mana whenua / tangata whenua as kaitiaki and landowners as stewards of indigenous biodiversity.
Policy package option 1 (preferred option): There are five parts to this policy package. These are: 1. Amendments to policies 23 and 24 to specify a completion date for the identification of sites with significant biodiversity values, directing regional and district councils to have plan provisions in place to protect these sites by June 2025. While this has been a requirement in the RPS since 2013, and the RPS has provided a set of criteria to underpin this work since 1995, less than half of the district plans include schedules of significant sites and plan provisions. Method 21 is amended to ensure that each territorial authority has a plan for completion in place to meet these timeframes. 2. Policy 24 has also been extended to provide a regional interpretation for the limits to the use of biodiversity offsetting and compensation (one of the principles already required by effects management hierarchies in international and best practice guidance and the principles of offsetting and compensation in the exposure draft NPS-IB). Appendix 1A applies these principles to identify the ecosystems and species where these limits apply in the

Wellington Region[166]. For sites with significant biodiversity it also changes the requirement for a 'no net loss' to a '10% net biodiversity gain' for offsetting and a '10% net biodiversity benefit' for compensation.

3. Policy IE.3 and Method IE.3 direct Greater Wellington, in partnership with mana whenua / tangata whenua, to use a systematic conservation planning process to maintain, enhance and restore the region's indigenous ecosystems to a healthy functioning state and to take a collaborative approach, with mana whenua / tangata whenua, landowners and the community, to identify strategic targets and priorities for restoration. Method CC.9 is a new method to provide support and funding to proactively seek to protect, enhance and restore sites with priority values for indigenous ecosystem and/or nature-based solutions.
4. Policies IE.1 and IE.2, and Method IE.1, IE.3. IE.4 (plus Method 32, discussed above) seek to better recognise and provide for Māori values for indigenous biodiversity and recognise and provide for the role of mana whenua / tangata whenua as kaitiaki in relation to indigenous biodiversity in the region.
5. Policy IE.4 and Method 32 seek to better recognise and provide for the important role that landowners and the community have as environmental stewards in relation to indigenous biodiversity.

Policy package option 2 (Status quo): Retain existing Policies 23 and 24 that provide for identification and protection of ecosystems and habitats with significant values for indigenous biodiversity values. Policy 47 provides an interim assessment framework for managing effects on significant values. This option would continue to rely on these operative provisions and delay any more directive policies to protect, maintain and restore indigenous biodiversity until the NPS-IB has statutory effect.

Policy package option 3 (go harder/faster): This option would seek to achieve the same outcomes as Option 1 with more urgency, priority and obligations on all parties. Additional elements in this policy package would require immediate commissioning of work to identify significant indigenous biodiversity and ecosystem sites throughout the region, include ecological bottom-lines in the RPS now, and provide an immediate, substantial increase in funding for protection and restoration of indigenous biodiversity.

	Option 1 (Preferred policy package)	Option 2 (Status quo)	Option 3 (Alternative, additional provisions)
Costs:			
Environmental	Nil. There are no identified environmental costs associated with this option. It provides a suite of policies and methods to better protect, maintain and restore indigenous biodiversity in the region.	Medium-high. With no amendment to the existing policy direction, this option is likely to result in continued delays in identifying and protecting significant areas in district plans. This is a clear risk given that more than 50% of the region's land area is still to be surveyed for significant terrestrial	Nil. There are no identified environmental costs associated with this option. It delivers the same environmental outcomes as Option 1 with more urgency, immediate action, and funding.

[166] The background report for Appendix 1A is available here Limits to Offsetting - Thresholds of concern for biodiversity.pdf

		biodiversity - this generally being recognised as required practice to meet obligations under section 6(c), with Policy 23 in the RPS being operative since 2013. Not setting ecological bottom lines or targets may result in further degradation and loss of the region's indigenous biodiversity. Further, this option does not provide sufficient support for mana whenua / tangata whenua, landowners, and communities to protect and restore indigenous biodiversity which is expected to result in insufficient action and ongoing biodiversity loss.	
Social	Low-Medium. There is likely to be some tensions among landowners and community members in some locations concerning the requirement to identify and protect significant ecological sites on private land. This is a common issue and concern from landowners throughout New Zealand based on perceived restrictions on private property land (regardless of whether there is any intention to develop the land). The requirements to identify and protect significant natural areas already exist, are generally understood and increasingly recognised as necessary to protect significant ecological areas. However, these	Low-medium. As with Option 1, there would likely be tensions among landowners and community members concerning the requirement to identify and protect significant ecological sites on private land. The current lack of recognition in the RPS about the important role and contributions from mana whenua / tangata whenua, landowners and community members to protect, maintain and restore indigenous biodiversity may exacerbate these tensions.	Medium. As with Option 1, there would likely be tensions among landowners and community members concerning the requirement to identify and protect significant ecological sites on private land. These tensions and potential costs to the community are expected to increase by the requirement for this to occur more rapidly. This compressed timeframe would not allow for sufficient collaboration and partnership and is likely to result in landowner resistance and social tensions about any mapping of significant ecological areas on their land. Greater Wellington Regional Council could also be seen as

	social tensions and costs may be exacerbated by the proposed timeframes for this to occur (by June 2025) which is more ambitious than proposed in the NPSIB exposure draft (5 years after it comes into force). Actual costs to the community will depend on the approach to identify significant ecological areas by territorial authorities and the RPS emphasises that this should be done in partnership and collaboration with landowners.		taking over or forcing a contentious district responsibility which could have wider social costs and undermine existing initiatives. Overall, the pace of change, additional organisations involved, and new requirements may create confusion of responsibility, uncertainty in where costs fall, and lower trust from the community in achieving the intended outcome.
Economic	Low economic costs to wider community, medium economic costs to individual landowners. A key focus on the policy package is non-regulatory methods to better support mana whenua / tangata whenua, landowners and the community to protect, maintain and restore indigenous biodiversity. This will have economic costs for Greater Wellington Regional Council which has not yet been committed but is expected to be low. The identification and protection of significant ecological areas inevitably involves some opportunity and compliance costs – although actual costs depend on various factors. There is also likely to be concerns about the impacts (or perceived impacts) on property values from	Medium-high. Failure to adequately protect indigenous biodiversity and ecosystems within and outside significant sites may result in long-term loss and degradation of biodiversity and ecosystem services which has a consequent economic cost.	Low economic costs to wider community, medium economic costs to individual landowners. Low-Medium overall funding required. Generally, the economic costs under this option are the same as Option 1. However, implementation costs and costs for landowners are expected to be higher than Option 1 due to more rapid implementation. This is because the pace of implementation is likely to cause more issues and resistance from landowners resulting in inefficiencies and an overall increase in economic costs (e.g., more opposition though plan changes to identify and protect ecologically significant sites).

	significant ecological site protection being borne by private owners for a public benefit (e.g., increased ecosystem service values or increased amenity value for neighbouring areas). However, these requirements already exist in the RPS and are expected to be standard practice nationally to give effect to the policy direction in the exposure draft NPS-IB when it comes into effect. The main economic cost under this option is requiring the identification and protection of significant ecological areas to occur sooner which is expected to have limited economic costs over and above the status quo.		
Cultural	Nil. No cultural costs are anticipated under this option as cultural values are much better recognised and provided for than under the status quo.	Medium-high. Continued lack of recognition for the cultural values of indigenous biodiversity to mana whenua / tangata whenua and their important role as kaitiaki of indigenous biodiversity in their rohe. The ANZBS and anticipated policy direction in the NPS-IB exposure draft directs a more collaborative, culturally-aware approach to conservation that this option fails to give effect to.	Low-medium. While this option seeks to better recognise cultural values like Option 1, there may be issues for mana whenua / tangata whenua and cultural costs associated with the speed of implementation. Undertaking assessments of indigenous ecosystem values and critical attributes with mana whenua / tangata whenua will require a time commitment and process that has not yet been confirmed and rushing this process is likely to result in implementation issues for all parties.
Benefits:			
Environmental	Medium-High. This option is expected to be more effective than the status quo in	Low. Significant sites may still be protected under the status-quo, but will be slower	High. Environmental benefits similar to Option 1. However, the faster and more

	protecting, maintaining, and restoring indigenous biodiversity in the region. In particular, this option will be more effective to: • Identify and protect significant ecological sites in a timely manner (compared to waiting for the NPS-IB to come into effect which could be further delayed) • Recognise and support the role of mana whenua / tangata whenua as kaitiaki and landowners as stewards in relation to indigenous biodiversity leading to improved ecological outcomes. The identification of ecological attributes critical to maintain healthy functioning ecosystems and targets and priorities for restoration is also likely to result in better direction of resources to resolve environmental issues and better protect and restore indigenous biodiversity. The setting of limits to offsetting and compensation and a 10% net gain or net benefit expectation help to ensure better outcomes from the use of biodiversity offsetting. This aligns with the offsetting principle in the exposure draft NPS-IB to achieve a 'net gain' in biodiversity values when offsetting is proposed. Setting a quantum of 10% takes a precautionary approach that reflects the inherent risks	than under option 1. No additional identification and mapping likely to be carried out until required by NPS-IB when it comes into effect (5+ years). Policy 47 would continue to provide an interim assessment framework for considering adverse effects on indigenous biodiversity values.	directive nature of this option means that it is more likely to meet its objectives than Option 1. For example, this option is more likely than the status quo to result in the effective, timely protection of significant ecological sites. Additional immediate funding also likely assists with achieving the desired outcomes in a timelier manner.

	associated with offsetting.[167] This quantum also aligns with the UK government's recent Environment Bill which stipulates the need for a 10% net gain from development.[168]		
Social	Medium. Better recognition and support for the efforts of landowners and community members is anticipated to result in better engagement with restoration and conservation initiatives and recognition of public benefits. Protection in some areas would align with community sentiment to avoid greenfield urban development in areas with biodiversity values[169].	Low-medium for some landowners. Slow significant site protection may be assessed as positive by those landowners who do not support this method of biodiversity protection. Some landowners may prefer a less restrictive approach to biodiversity protection on their land. These benefits are expected to be limited to certain landowners with limited benefits to the wider community under status quo compared to what is expected to be achieved under Option 1 and 3.	Medium. Similar social benefits to Option 1 but these benefits would be realised quicker. Increased funding, support and recognition of the efforts of landowners and community members is anticipated to result in better engagement with restoration and conservation initiatives.
Economic	Medium. Better protection for indigenous biodiversity and ecosystems should result in better provision of ecosystem services, especially for climate change mitigation/adaptation, which has flow on economic benefits for current and future generation. The scheduling of SNAs and inclusion of limits to offsetting provides certainty for landowners about the areas that have development restrictions or that are not	Low. Protection of significant biodiversity values, and the ecosystem services these support, may still be achieved through implementation of Policies 23 and 24 but expected to be slower than Option 1 or 3. Some potential economic benefits from allowing significant ecological sites to identified in a more staged manner aligned with NPS-IB requirements when this comes into effect.	Medium-High. Better and faster protection for indigenous biodiversity and ecosystems may result in better provision of ecosystem services. The scheduling of SNAs and inclusion of limits to offsetting provides certainty for landowners about the areas that have development restrictions or that are not suitable for development.

[167] See zu Ermgassen et al. 2019. The ecological outcomes of biodiversity offsets under "no net loss" policies: A global review, *Conservation Letters*(12), https://conbio.onlinelibrary.wiley.com/doi/pdf/10.1111/conl.12664
[168] Natural England. 2021. Biodiversity net gain – more than just a number, https://naturalengland.blog.gov.uk/2021/09/21/biodiversity-net-gain-more-than-just-a-number/
[169] Feedback on draft WRGF and structure plans for greenfield areas.

	suitable for development. This in turn provides certainty on areas more suitable for development which can lead to efficiency gains and more certain consenting processes.	Ensures implementation approach is based on the final NPS-IB policy direction and requirements when this comes into effect, reducing the potential risk of any rework and associated implementation costs that could occur under Option 1 and 3.	Benefits are likely to be more quickly realised through this option given the faster timeframes and additional funding to support outcomes.
Cultural	Medium-High. Cultural values, including specific recognition of the concept and principles of Te Rito o te Harakeke, much better recognised and provided for than under the status quo. Provides better scope to meet iwi aspirations to restore the mana and mauri of waterways and indigenous ecosystems[170]. Better enables mana whenua / tangata whenua to set culturally-determined targets and carry out their role as kaitiaki, e.g., through the establishment of kaitiaki monitoring programmes.	Low. Little recognition of the wider cultural values of indigenous biodiversity aside from the mana whenua / tangata whenua criterion for determining significance under Policy 23.	High. Cultural values much better recognised than under the status quo. More scope for mana whenua / tangata whenua to set culturally-determined objectives for indigenous biodiversity and monitor outcomes using methods based on Te Ao Māori and Mātauranga Māori. A more collaborative approach to securing permanent protection than Option 1, potentially resulting in more culturally desirable outcomes.
Effectiveness:			
How successful will you be in providing the outcome set by the objective?	This option will likely meet the objectives. New policies and methods are targeted at resolving the environmental issues identified.	This option is unlikely to meet the objectives. Protection of significant sites in the region has been slow. In some districts progress has stalled. Existing methods have been either completed (Method 21) or are in place (Methods 32, 53, 54) but are not	This option will likely meet the objectives. New policies and methods are targeted at resolving the environmental issues identified.

[170] For example, the Ngāti Toa Rangatira Statement (prepared for the Te Awarua-o-Porirua Whaitua Implementation Programme) includes the following aspirations: "..we wish for the fish, birds, insects and plants of this ancient ecosystem to thrive once again. These aspirations are grounded in our responsibility as mana whenua of this region." "The mana and mauri of all of our waterways and associated ecosystems within the Ngāti Toa Porirua rohe must be returned to a state of health, enabling our iwi to carry out its cultural responsibilities and obligations to its people, manuhiri and future generations.

		sufficient to resolve the environmental issues they are targeted at.	
Efficiency:			
Will the option contribute to achieving the objective at the lowest total cost to all members of society?	This option does not impart costs that are significantly different from the status quo, but may bring forward costs for territorial authorities. Additional costs – such as for non-regulatory support and target setting initiatives – are primarily borne by Greater Wellington Regional Council. Costs are thus spread across regional ratepayers.	This option has failed to achieve its objective. While it is a feasible option at lower short term cost, it is unlikely to meet its objective in the near future.	This option has some additional costs but these are not significantly different from the status quo. Additional costs – such as for non-regulatory support and target setting initiatives – are primarily borne by Greater Wellington Regional Council. Costs are thus spread across regional ratepayers at a similar level to Option 1. This option does however entail costs in addition to those required to implement Option 1, mostly to speed up the process. It expected to be less efficient than Option 1. The speed of implementation also poses risks with respect to the ability to resource the technical process of setting bottom-lines and include all relevant parties in their determination. Potential duplication and conflict in agency responsibilities may also create inefficiencies.
Risks of acting or not acting if there is uncertain or insufficient information:	The overall status and threats to indigenous biodiversity in the Wellington region is well established.[171] . The use of a strategic conservation planning process to identify the attributes required for ecosystems to be in a healthy functioning state, and set targets and priorities for protection and restoration through Policy IE.3, ensures that future resources are allocated effectively and to the conservation areas of most pressing concern. The requirement for a 10% net gain from the use of biodiversity offsetting and a 10%		

[171] For a summary of indigenous biodiversity status and threats in the Wellington Region see Greater Wellington. 2016. *Greater Wellington Regional Council Biodiversity Strategy*, https://www.gw.govt.nz/assets/council-publications/Biodiversity-Strategy-2016.pdf, pp. 6-7.

	net benefit for biodiversity compensation is a precautionary approach, accounting for the fact that offset and compensation outcomes for biodiversity are often poor. While recognising the contentious and challenging nature of the process to identify areas with significant indigenous biodiversity, the fact that local authorities have been required by section 6 of the RMA to recognise and provide for the protection of these areas since 1991, and that the RPS has provided a set of criteria to underpin this since 1995, combined with the ongoing threats to biodiversity, support the amendments to require councils to complete this work.
Overall evaluation	Option 1 provides the most efficient and effective means of achieving the objective. Continuing with the status quo is very unlikely to result in positive biodiversity outcomes for the region. The proposed amendments give effect to the direction of the ANZBS and the exposure draft NPS-IB. Importantly, the amendments recognise and further incentivise the contributions of mana whenua / tangata whenua, landowners and community members in regional biodiversity conservation.

Urban development evaluation – efficiency and effectiveness of provisions

Urban Development
This policy package is to achieve amended Objective 22 and new Objective 22B to enable appropriate urban development that demonstrates the qualities and characteristics of well-functioning urban environments
Intent of this policy package: Policy package seeks to give effect to the National Policy Statement on Urban Development (NPS-UD) and provide for integration with other chapters of the RPS.
Policy option 1 "refined approach": Preferred policy package which includes: • Proposed amendments to Policies 30 (maintaining and enhancing the viability and vibrancy of regionally and locally significant centres), Policy 31 (identifying and promoting a range of building heights and density), Policy 32 (identifying and protecting industrial-based employment locations) , Policy 33 (supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions), Policy 55 (urban expansion), Policy 56 (managing development in rural areas), Policy 57 (integrating land use and transportation), Policy 58 (coordinating land use with development and operations of infrastructure) and 67 (maintaining and enhancing the qualities and characteristics of well-functioning urban environments); and • Policy UD.1 (provision for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land), Policy UD.2 (enable Māori cultural and traditional norms), Policy UD.3 (responsive planning), Policy CC.17 (climate-resilient urban areas) **Policy option 2 "minimal approach":** Undertake minimum changes to give effect to NPS-UD direction by 1 August 2022 (Policy 3 of the NPS-UD). This option would be limited to the proposed changes to Policy 31.

Policy option 3 "spatial approach": Same as Policy option 1 plus incorporation of spatial mapping into the RPS as derived from the Wellington Regional Growth Framework (WRGF). This approach would include:

- Replacement of Policy 30, Policy 31 and Policy 55 with new policy and associated spatial mapping, as derived from the WRGF, with direction for future urban development to be undertaken in accordance with spatial maps; and
- Proposed amendments[172] to Policy 32, Policy 33, Policy 56, Policy 57, Policy 58 and Policy 67; and
- Proposed Policy[173] UD.1, Policy UD.2, Policy UD.34 and Policy CC.17.

	Option 1 "refined approach" (preferred)	Option 2 "minimal approach"	Option 3 "spatial approach"
Costs:			
Environmental	Low-moderate *Biophysical* Urban development has direct impacts on the biophysical environment through loss of biodiversity, impacts on water quality and yield and impacting other significant values. This impact is generally greater for greenfield development than brownfield/infill development. The proposed provisions seek to integrate urban development with maintaining the quality of the natural environment and enable intensification and infill development in preference to greenfield. However, there remains trade-offs for enabling urban development, in particular residential intensification, which will result in environmental effects. *Amenity* The cumulative effects of the provisions will, over time, change the amenity values	High *Biophysical* This option does not provide for integration between urban development and maintaining the quality of the natural environment. Without this integration, urban development is enabled to a higher degree than currently exists and is likely to result in the degradation of the natural environment and Issue 2 would not be addressed. This option would not provide for the responsive planning provision (Policy UD.1) and direction to territorial authorities to consider out of sequence or unanticipated developments that add significantly to development capacity. In the absence of this direction, territorial authorities will not have any direction to consider such developments resulting in ad-hoc decision making for such	Low-moderate *Biophysical* The spatial mapping for growth areas have not been informed by the latest HBA and was identified prior to the amendments to the National Policy Statement for Urban Development and the Medium Density Residential Standards. There is potential that growth areas identified, are no longer appropriate for development or not required in order to meet demand requirements. This spatial mapping could result in enabling development unnecessarily and result in further degradation of the natural environment. Spatial mapping at a regional scale would require high level direction for constraints to growth. Being at this

[172] With necessary amendment to align with spatial direction
[173] With necessary amendment to align with spatial direction

	of urban areas within Tier 1 Districts. This change will arise from the transition of these areas from their current amenity, being predominantly low-density urban development (e.g. standalone housing on standard suburban lots), to a mixed housing typology with taller buildings and small sites. Areas for intensification may include identified character areas which will result in potential loss of character and resultant amenity effects. Policy 6 (b) of the NPS-UD directs decision makers to anticipate these significant changes and that there may be a short-term impact on amenity values; but those changes will improve amenity values appreciated by other people, communities and future generations through increased access to housing. Poor urban design can degrade amenity values of the built environment and people's enjoyment of cities and places. The NPS-UD and the Medium Density Residential Standards[174] ("MDRS") are particularly directive for medium and high-density residential development and provide local authorities limited ability to influence urban design. While there remains direction for providing urban design outcomes through Policy 54, 67 and	proposals and an inability to effectively consider the environmental constraints for proposed developments. *Amenity* The cumulative effects of the provisions will, over time, change the amenity values of urban areas within Tier 1 Districts. This change will arise from the transition of these areas from their current amenity, being predominantly low-density urban development (e.g. standalone housing on standard suburban lots), to a mixed housing typology with taller buildings and small sites. Areas for intensification may include identified character areas which will result in potential loss of character and resultant amenity effects. Policy 6 (b) of the NPS-UD directs decision makers to anticipate these significant changes and that there may be a short-term detraction of amenity values; but those changes will improve amenity values appreciated by other people, communities and future generations through increased access to housing. Other aspects of "well-functioning urban environments" are not provided for in this option thereby relying on the operative direction. In the absence of this	large scale, there is less ability to identify all necessary areas for protection. *Amenity* The cumulative effects of the provisions will, over time, change the amenity values of the urban areas within Tier 1 Districts. This change will arise from the transition of these areas from their current amenity, being predominantly low-density urban development (e.g. standalone housing on standard suburban lots), to a mixed typology with taller buildings and small sites. Areas for intensification may include identified character areas which will result in potential loss of character and resultant amenity effects. Policy 6 (b) of the NPS-UD directs decision makers to anticipate these significant changes and that there may be a short-term detraction of amenity values; but those changes will improve amenity values appreciated by other people, communities and future generations through increased access to housing.

[174] Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

	Method UD.2, there is limited ability to influence medium and high-density residential development due to the directive nature of national direction[175] for Tier 1 districts.	direction, there is no balance between enabling intensification and providing for quality outcomes, including maintaining the quality of the natural environment.	
Social	Low - moderate Increased development within, or near rural areas or industrial areas can increase the potential for reverse sensitivity effects to arise as new activities are impacted by existing activities resulting in community tension, uncertainty and individual stress for both complainants and owners/operators of existing activities. Policy direction looks to manage this conflict through enabling housing intensification (Policies 31) and setting specific criteria for new growth areas (Policy 55 and UD.3). Policies 32 and 56 further protect key industrial areas based on employment locations and the characteristics and values of the rural area. The move away from standalone housing to a more mixed housing typology could reduce social cohesion for the existing community residing in these areas. The changing demographic mix that may arise in response to opportunities created by a changing typology mix could include fewer 'traditional' families than has previously	Moderate Poorly managed or laid out urban development can result in impacts such as increased travel time, degradation of the natural environment and increased pressure on shared spaces, affecting social well-being. This option would not provide for other aspects of "well-functioning urban environments" that seek to address these matters. Any reverse sensitivity impacts on rural and industrial land would not have the same level of protection as Options 1 or 3 and would rely on existing direction. There is no increased provision for providing quality urban design outcomes under this option.	Moderate Spatial direction can effectively direct the boundaries between urban and rural areas and assist in managing this conflict and any reverse sensitivity. While key industrial locations may not be identified, proposed changes to Policy 32 will ensure those locations are protected. While the Spatial Approach provides certainty for potential development areas, it may not provide the territorial authorities with sufficient discretion to objectively consider the appropriateness of a growth area. As there has been changes to legislation since the WRGF was developed, in particular the medium density residential standards, providing for development capacity is further enabled within the existing urban footprint meaning that greenfield growth areas identified in the WRGF may no longer be necessary or appropriate.

[175] Policy 3 of the National Policy Statement of Urban Development and the Medium Density Residential Standards.

	been the case in these areas. This change could extend to future generations who will have reduced ability to enjoy social cohesion arising from being in neighbourhoods with people of a similar age and life stage. Poor urban design outcomes directly impact social well-being of people and overall quality of life. While there remains direction for providing urban design outcomes through Policy 54, Policy 67 and Method UD.1, there is limited ability to influence medium and high-density residential development due to the directive nature of national direction[176] for Tier 1 districts.		Spatially identifying potential development areas also gives an expectation to the community which may not be practical nor feasible to undertake following local level decision making. Should it be determined that they are no longer appropriate or there is limited desire to develop in those areas, this gives a false expectation for the community.
Economic	Low to moderate Providing for integration between urban development and the quality of the natural environment will result in development costs. The direction requires multimodal transport to be provided and for infrastructure to be in place prior to development commencing. There are costs associated with providing additional infrastructure to service planned development (both intensification and future growth areas). This cost will be	Low While this option does enable intensification direction, it does not fully address providing for sufficient development capacity. In particular, the direction would continue to refer to development in accordance with the 2007 Wellington Regional Growth Strategy which infers only contiguous growth and does not provide for responsive planning. Not providing for development capacity will result in reduced supply of housing, increased	High There is a cost associated with implementation for territorial authorities. The spatial approach is also a significant change from the operative direction. With most territorial authorities currently reviewing their district plans, there will be further iterations, or an additional plan change to give effect to the direction. If the WRGF spatial mapping cannot be relied upon, there is cost associated

[176] Policy 3 of the National Policy Statement of Urban Development and the Medium Density Residential Standards.

	borne on developers and local authorities, including current and future property owners/occupants (costs passed on to renters). There is a cost associated with implementation for territorial authorities. With most territorial authorities currently reviewing their district plans, there will be further iterations, or an additional plan change to give effect to the direction.	development/living costs and less employment opportunities. There are costs associated with providing additional infrastructure to service higher density developments. This cost will be borne on developers and local authorities, including current and future property owners/occupants (costs passed on to renters).	with researching and developing and maintaining spatial data and mapping. This approach limits future urban development leading to higher economic costs associated with affordability of housing and employment opportunities due to lower land availability.
Cultural	Low-moderate Through engagement with mana whenua / tangata whenua, feedback provided indicates that intensification enabled by national direction can directly impact cultural values. It can impact upon sites of significance to mana whenua / tangata whenua, including impacting view shafts of cultural significance. There is also potential for reverse sensitivity issues associated with existing land use undertaken by mana whenua / tangata whenua (in particular marae). While direction is provided to manage the conflict that might come with intensification and its impact on cultural values, there are limitation for intervening under the NPS-UD e.g. only where a qualifying matter is identified. Direction requires district plans to enable for Māori to express cultures and traditions to be provided for in district plans, which	Moderate - high Under this option, there would be no provision specifically for mana whenua / tangata whenua. There would continue to be no specific provision for to enable Māori to develop their ancestral land or express their cultures and traditions in land use and development. This option may result in an inability for mana whenua / tangata whenua to develop their land and potential for degradation to sites of significance to mana whenua / tangata whenua through further development. The change does not encompass a review of the Tangata Whenua chapter and therefore is limited in its ability to provide broader direction for values of significance to mana whenua / tangata whenua.	Low-moderate Through engagement with mana whenua / tangata whenua, feedback provided indicates that intensification enabled by national direction can directly impact cultural values. It can impact upon sites of significance to mana whenua / tangata whenua, including impacting view shafts of cultural significance. There is also potential for reverse sensitivity issues associated with existing land use undertaken by mana whenua / tangata whenua (in particular marae). While direction is provided to manage the conflict that might come with intensification and its impact on cultural values, there are limitation for intervening under the NPS-UD e.g. only where a qualifying matter is identified.

	include as a minimum providing for marae and papakāinga. This option will result in reduced cost associated with the development of marae and papakāinga. The change does not encompass a review of the Tangata Whenua chapter and therefore is limited in its ability to provide broader direction for values of significance to mana whenua / tangata whenua.		Direction requires district plans to enable for Māori to express cultures and traditions to be provided for in district plans, which include as a minimum providing for marae and papakāinga. This option will result in reduced cost associated with the development of marae and papakāinga. Spatial mapping of sites of significance to mana whenua / tangata whenua may limit discretion at a local level for sites and values of significance to be identified and provided for in district plans. The change does not encompass a review of the Tangata Whenua chapter and therefore is limited in its ability to provide broader direction for values of significance to mana whenua / tangata whenua.
Benefits:			
Environmental	High *Biophysical* Integrated direction (also see related evaluation in Climate Change, Biodiversity and Freshwater chapters) seek to manage tension between providing for urban development and maintaining or enhancing the quality of the environment and will provide for greater environmental outcomes than currently.	Low *Biophysical* No environmental benefits identified. *Amenity* There are further opportunities provided for gentrification within brownfield development through the enabling direction for intensification.	High *Biophysical* A spatial approach provides further clarity to environmental constraints to urban growth and provides an added level of protection to those areas identified. Integrated direction (also see related evaluation in Climate Change, Biodiversity and Freshwater chapters)

	Multi-modal transport direction supports uptake of zero and low-carbon multi-modal transport which supports adaption to climate change. Brown field redevelopment and intensification generally results in a more efficient use of land and less of an environmental impact than greenfield development. The direction encourages intensification over new (greenfield) development through enabling intensification and requiring further restrictions for new urban development beyond the existing footprint. Direction for new urban development beyond the current extent (Policy 55) provides specific criteria that must be achieved to avoid inappropriate development and to promote compact urban form and transit orientated development. In addition, the responsive planning policy (Policy UD.3) provides clear direction to Territorial Authorities, including environmental constraint considerations, for any private plan change requests for developments that are out of sequence or unanticipated that contribute significantly to development capacity. *Amenity* There are further opportunities provided for gentrification within brownfield		seek to manage tension between providing for urban development and maintaining or enhancing the quality of the environment and will provide for greater environmental outcomes than currently. Multi-modal transport direction supports uptake of zero and low-carbon multi-modal transport which supports adaption to climate change. *Amenity* The spatial approach ensures coordinated urban growth that remains compact in its form.

	development through the enabling direction for intensification. The direction provides for higher quality environmental outcomes, including minimum vegetation cover which provides for greater amenity values.		
Social	High Greater flexibility and choice in housing will better meet people's needs and lifestyle preferences. This flexibility and choice includes encouraging higher residential densities in locations that are well served by shops, services, parks and public transport. Direction would provide for activities that support health and wellbeing of people to locate in residential areas, improving their accessibility to the community. This approach will benefit the existing community and future generations, as well as providers of these services. Direction seeks that any further urban development is undertaken to provide for the qualities and characteristics of well-functioning urban environments, including being consistent with strategic growth directives including the WRGF in the interim and FDS once developed.	Moderate Greater flexibility and choice in housing will better meet people's needs and lifestyle preferences. This flexibility and choice includes encouraging higher residential densities in locations that are well served by shops, services, parks and public transport.	Moderate - high By identifying the full extent of the future growth areas, and explicitly setting out the circumstances in which areas for future growth, this option provides greater certainty to landowners, residents adjoining or neighbouring the future growth areas and the community. Greater flexibility and choice in housing will better meet people's needs and lifestyle preferences. This flexibility and choice includes encouraging higher residential densities in locations well served by shops, services, parks and public transport.
Economic	High Direction enables suitable urban development, in particular intensification	High Direction enables urban development, in particular intensification within Tier 1	Moderate – high By providing certainty through the spatial direction for future growth

	within Tier 1 districts. This enabling framework will provide for increased development and increased supply of housing. This benefits business owners, investors, NGOs and other service providers engaged in activities that benefit the health and wellbeing of the community. The direction creates more flexibility and choice for housing options, which will help improve housing affordability as people have options to purchase/rent properties more aligned to their personal circumstances, including smaller properties.	districts. This enabling framework will provide for increased development and increased supply of housing. This benefits business owners, investors, NGOs and other service providers engaged in activities that benefit the health and wellbeing of the community.	areas, investment can be undertaken including the supporting infrastructure. Direction enables suitable urban development, in particular intensification within Tier 1 districts. This enabling framework will provide for increased development and increased supply of housing. This benefits business owners, investors, NGOs and other service providers engaged in activities that benefit the health and wellbeing of the community.
Cultural	Moderate – high As identified through the WRGF, Māori home ownership rates are lower than non-Māori in the region with access to affordable housing a significant issue. The change will enable increased supply of housing and typology which support improved social and economic outcomes for Māori. Policies UD.1 and UD.2 in particular will enable Māori to express their culture and traditions in land use and development and provide for the occupation use and development for mana whenua / tangata whenua with their ancestral land. While this is broader than just urban development as directed by the NPS-UD, the policies acknowledged that	Low The intensification direction will enable increased supply of housing and typology which support improved social and economic outcomes for Māori.	Moderate – high Spatial mapping would identify constraints to growth, including sites of significance to mana whenua / tangata whenua. This provides further protection to such sites that are not currently identified in lower order planning documents. As identified through the WRGF, Māori home ownership rates are lower than non-Māori in the region with access to affordable housing a significant issue. The change will enable increased supply of housing and typology which support improved social and economic outcomes for Māori. Policies UD.1 and

	these values should not be contained to certain areas and ancestral land can be located throughout a district. Outcomes for Māori are specifically provided for in the WRGF. Proposed changes to Policy 55 will require any further urban development outside the current urban extent is consistent with the WRGF[177] until such time as the FDS takes effect.		UD.2 in particular will enable Māori to express their culture and traditions in land use and development and provide for the occupation use and development for mana whenua / tangata whenua with their ancestral land. While this is broader than just urban development as directed by the NPS-UD, the policies acknowledged that these values should not be contained to certain areas and ancestral land can be located throughout a district. Outcomes for Māori are specifically provided for in the WRGF. Proposed changes to Policy 55 will require any further urban development outside the current urban extent is consistent with the WRGF[178] until such time as the FDS takes effect.
Effectiveness:			
How successful will you be in providing the outcome set by the objective?	The option provides a policy package that aligns with the outcomes sought by the objective. Development capacity is provided for through enabling intensification in line with the NPS-UD[179] directive, enabling appropriate future growth areas to be identified outside the	Would partially meet the outcomes sought by the objectives as it relates to intensification. Does not provide for other aspects of a well-functioning urban environment or integration with other directives of the RPS and is therefore less effective.	In the short term, the approach would be effective in achieving the outcomes sought through the direction. The approach would provide a higher level of certainty and transparency to the public and councils. However, there is potential that the approach will conflict with the FDS for the Wellington Region

[177] Clause (b) of Policy 55.
[178] Clause (b) of Policy 55.
[179] Policies 31 and UD.1

	current urban footprint[180] and providing for responsive planning[181]. Development is enabled in a way that will improve the overall health, well-being and quality of life of the people of the Wellington Region. Māori are enabled to express their cultures and traditions through specific direction to require that district plans support the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land, including through providing for marae and papakāinga. Direction ensures urban environments are well connected via multi modal transport. Integration is provided for between chapters (see Freshwater and Climate Change evaluation) to ensure that urban development is undertaken in a way that maintains and enhances the quality of the natural environment and provide for a transition to a low emission and climate resilient region.		which is likely to come into effect within the next few years.
Efficiency:			
In being successful, will the net cost to society be low?	Considering the costs outlined above, while there will be moderate - high economic cost associated with this option, the cultural, social and environmental costs remain low. Overall, the cost to society is	Considering the costs outlined above, there will be high environmental, social and cultural cost that comes with this option. While economic cost remains low, the overall cost is considered moderate –	Considering the costs outlined above, there will be a high economic cost and a low-moderate cultural, social and environmental costs associated with this option. Overall, the cost to society

[180] Policy 55
[181] Policy UD.4

	considered to be low marginal costs in the context of the changes driven by the NPS-UD.	high marginal costs in the context of the changes expected by the NPS-UD.	will be moderate marginal costs in the context of the changes expected by the NPS-UD.
In being successful, will the net benefit to society be high?	Considering the benefits outlined above, the change will provide for a high environmental, economic, social and cultural benefit. Overall, the net benefit to society is considered high.	Considering the benefits outlined above, the change will provide for high economic benefit, low - moderate environmental, social and cultural benefit. Overall, the net benefit to society for this option is considered moderate.	Considering the benefits outlined above, the change will provide for moderate to high environmental, economic, social and cultural benefit. Overall, the net benefit to society for this option is considered moderate.
Risks of acting or not acting if there is uncertain or insufficient information:	The refined approach goes further than the necessary requirements of the NPS-UD for the change required by August 2022. In particular, the direction introduces the concept of a "well-functioning urban environment" and promotes urban development to demonstrate the characteristics and qualities of a well-functioning urban environment. While not all districts within the Wellington Region contain an "urban environment", the direction is intended to also apply to those areas where the characteristics and qualities are applicable. Direction for providing for Māori to express cultural traditions and norms has been broaden from only urban development, and rather to all land use and development as a result of feedback during engagement with mana whenua / tangata whenua. While this goes further than national	N/A – approach would be primarily based on national direction	Subpart 4 of the NPS-UD requires a FDS to be prepared for the Wellington Region. This FDS will set out a 30-year spatial plan and will have its own regulatory weight in terms of consideration for all planning decisions, irrespective of the RPS direction. While the WRGF provides strategic spatial direction for the region, it does not form the FDS. The FDS will follow a set process, including specific engagement requirements[183]. The WRGF has also not been informed by the latest HBA and was prepared before the Medium Density Residential Standards and amendments to the NPS-UD were undertaken which enable a higher level of medium density development. Therefore, there is some uncertainties over the spatial direction which may be subject to change with the FDS.

[183] Clause 3.15

	direction, it is appropriate and must be provided for in accordance with Section 6(e) of the of the RMA. Subpart 4 of the NPS-UD requires a FDS to be prepared for the Wellington Region. This FDS will provide direction for achieving well-functioning urban environments[182]. While this could be relied upon for giving the regional direction, it is likely that it will not be until 2024 at the earliest that the FDS will be prepared and take effect. In the interim, there is risk for further development to occur without sufficient regional direction for achieving well-functioning urban environments. It is expected that the FDS will provide more comprehensive direction once it is released and will build upon the work undertaken for the WRGF. The proposed changes have been informed by national direction, the WRGF and feedback from mana whenua / tangata whenua. Based on the level of direction that the refined approach provides, there is sufficient information and a low level of uncertainties.		This option has a high risk of acting in the face of uncertain and insufficient information.
Overall evaluation	Overall, Option 1 is the most effective and efficient approach to achieve the objectives. The option balances enabling urban development to provide for sufficient development capacity, create opportunities for high quality living environments that are well connected with efficient end use of energy, and maintaining the quality of the natural environment in line with other RPS		

[182] Clause 3.13, subclause 1(a)(i)

	direction. This is achieved through a regulatory approach that provides clear direction to territorial authorities, decision makers and the community for how urban development is undertaken to provide for the characteristics and qualities of well-functioning urban environments. While the approach goes further than the "minimum approach" (Option 2) in relation to changes to give effect to the NPS-UD, the benefits of this additional direction outweigh the lower overall costs. Conversely, the approach acknowledges the timing of this RPS change within the likely timing of the FDS that will provide future regional direction for achieving the qualities and characteristics of well-functioning urban environments once it has been developed. It therefore does not seek to conflict with it and does not adopt any spatial elements of the WRGF.

Regionally significant infrastructure provisions evaluation – efficiency and effectiveness of provisions

Regionally significant infrastructure
This amendment is to the definition of regionally significant infrastructure
Intent of this amendment: Amend the relevant definition in the RPS to achieve consistency with the RMA and NRP (following appeals) and achieve the purpose of the policies relying on this definition. There are two components to this proposal – to change the definition of telecommunication and radiocommunication facilities and remove an uncertainty with the use of 'strategic' with this definition, and to incorporate changes made to the definition of RSI as part of the Plan and Appeals process for the PNRP into the definition of RSI in the RPS. The definition of 'Strategic Transport Network' is included as this definition relates to the changes made for RSI for transport as part of the Plan and Appeals process on the PNRP
Option 1 (preferred) Amend definition as per PNRP plus amend the definition of telecommunications and radiocommunications facilities within the definition: Regionally significant infrastructure includes: • pipelines for the distribution or transmission of natural or manufactured gas or petroleum, including any associated fittings, appurtenances, fixtures or equipment • a network operated for the purposes of telecommunications, as defined in section 5 of the Telecommunications Act 2001 • a network operated for the purpose of radiocommunications, as defined in section 2(1) of the Radio Communications Act 1989 • the National grid • facilities for the generation and/or transmission of electricity where it is supplied to the National grid and/or the local distribution network • facilities for the electricity distribution network, where it is 11kV and above. This excludes private connections to the local distribution network • the local authority water supply network (including intake structures) and water treatments plants

- the local authority wastewater and stormwater networks and systems, including treatment plants and storage and discharge facilities
- the Strategic Transport Network (including ancillary structures required to operate, maintain, upgrade and develop that network)
- The following local arterial routes: Masterton-Castlepoint Road, Blairlogie-Langdale/Homewood/Riversdale Road and Cape Palliser Road in Wairarapa, Tītahi Bay Road and Grays Road in Porirua, and Kāpiti Road, Marine Parade, Mazengarb Road, Te Moana Road, Akatarawa Road, Matatua Road, Rimu Road, Epiha Street, Paekakariki Hill Road, The Parade [Paekakariki] and The Esplanade [Raumati South] in Kāpiti
- Wellington City bus terminal and Wellington Railway Station terminus
- Wellington International Airport
- Masterton Hood Aerodrome
- Kapiti Coast Airport
- Commercial Port Areas and infrastructure associated with Port related activities in the Lambton Harbour Area within Wellington Harbour (Port Nicholson) and adjacent land used in association with the movement of cargo and passengers and including bulk fuel supply infrastructure, and storage tanks for bulk liquids, and associated wharflines
- Silverstream, Spicer and Southern landfills.

Strategic transport network

The Strategic Transport Network includes the following parts of the Wellington Region's transport network:

- All railway corridors and 'core' bus routes as part of the region's public transport network identified in the Regional Land Transport Plan 2015, and
- All existing and proposed state highways, and
- Any other strategic roads that are classified as a National High Volume Road, National Road, or Regional Road as part of the region's strategic road network identified in the Regional Land Transport Plan 2015, and
- Any other road classified as a high productivity motor vehicle (HPMV) route identified in the Regional Land Transport Plan 2015, and
- All sections of the regional cycling network classified as having a combined utility and recreational focus identified in the Regional Land Transport Plan 2015, and
- Any other existing and proposed cycleway and/or shared paths for which the New Zealand Transport Agency and/or a local authority is/was the requiring authority or is otherwise responsible.

Within Option 1 two alternatives were considered for the two dot points for telecommunications and radiocommunications:

Proposal #1 amended wording is as follows (**preferred**):

a network operated for the purposes of telecommunications, as defined in section 5 of the Telecommunications Act 2001 radiocommunications, as defined in section 2(1) of the Radio Communications Act 1989

Proposal #2 – to amend the definition and remove the reference to 'strategic' and exclude specific reference to the respective Acts. The proposal wording is as follows:

<u>facilities and structures necessary for the operation of telecommunications and radiocommunications networks operated by network utility operators</u>

Option 2 (status quo) retain definition as in current RPS
Option 3 Amend definition as per PNRP definition (agreed following appeals)

	Preferred option amendment of the definition of telecommunications and radiocommunications, along with other amendments as per PNRP	**Option 2 Status quo** - no change in the operative version of the definition	**Option 3** - to amend the definition as per PNRP agreed amendments only
Costs			
Environmental, Economic Social, and Cultural	There is an immediate reduction in costs for the time required to determine telecommunication and radiocommunication facilities and networks. These are readily defined in the respective Acts which is less ambiguous and provides certainty for plan users.	No change in immediate costs, however there is a cost for resource consent applicants and decision makers in the time required to interpret the meaning of 'strategic' communication and radiocommunication facilities. An inconsistency between the RPS and NRP definitions will likely create inefficiencies and costs in interpretation and confusion in applying the two RMA document.	Reduced costs in having both definitions the same in the RPS and PNRP through improved consistency, reduced uncertainty, and less ambiguity for resource consent applicants and decision makers. Increased cost in attempting to determine how or what are facilities or assets that is not defined by the Telecommunications Act or Radiocommunications Act.
Benefits			

Environmental, Economic Social, and Cultural	An increased benefit to decision makers and Councils in having a clearly defined sub-clause for telecommunication and radiocommunication networks (the interpretation is reduced by not having reference to the word 'strategic' in the definition).	No benefit in remaining with Status quo.	Greater benefit in one definition across both documents. This will immediately improve the effectiveness and efficiency of decision making and interpretation for consenting. This amendment also provides for the RSI policy pathway to additional infrastructure acceptable as being regionally significant as part of the operative NRP plan process.
Effectiveness			
How successful will you be in providing the outcome set by the objective (the purpose of the amendment in this case)?	How successful will you be in providing the outcome set by the objective (the purpose of the amendment in this case)?	How successful will you be in providing the outcome set by the objective (the purpose of the amendment in this case)?	How successful will you be in providing the outcome set by the objective (the purpose of the amendment in this case)?
Efficiency:			*Efficiency:*
In being successful, will the net cost to society be low?	In being successful, will the net cost to society be low?	In being successful, will the net cost to society be low?	In being successful, will the net cost to society be low?
In being successful, will the net benefit to society be high?	An increase in net benefit through the preferred option through consistency, certainty in telecom/radiocom references, and ease of interpretation.	No change in net benefit if status quo remains.	A partial increase in net benefit through the alternative option.
Risks of acting or not acting if there is uncertain or insufficient information:	Acting on the preferred option reduces the risk to decision makers and territorial authorities that are required to give effect to this definition in the RPS. Greater uncertainty with the alternative option when compared to	There is a comparatively high risk remaining with the operative version of the definition for RSI, where there are two sub-clauses that are potentially undefinable, and two definitions of RSI could be operating between the RPS and the PNRP.	A reduced risk arises from having a consistent definition across both documents. This will provide greater certainty in decision making.

	the preferred option to not include references to higher order documents (Telecommunications Act 2001, and Radiocommunications Act 1989). There is a greater risk with this option than the status quo or the preferred option.		
Overall efficiency and effectiveness of the preferred option	The preferred option to align the amendments made in the Decision report and the Appeals process on the PNRP into the RSI definition in the RPS offers the most effective and efficient approach to addressing the issue of the RPS being inconsistent with the PNRP. The preferred option referencing the respective Telecommunication and Radiocommunication Acts provides the necessary link to activities and services that are defined in those Acts with the provisions in the RPS. The amendment proposed will increase the effectiveness and efficiency of the components of the definition in the RPS, leading to improved decision making at the resource consent level and for the regional council and territorial authorities having to give effect to higher order documents such as the RPS.		

Overall comment on the preferred option being the most appropriate

267. The RPS gives integrated direction to regional and district plans. Changes are required to make it consistent with national direction. The primary driver for undertaking RPS Change 1 at this time is the NPS-UD, which requires changes to the Regional Policy Statement and District Plans be notified by 20 August 2022, to enable more urban development and housing intensification.

268. The NPS-FM requires Te Mana o te Wai to be articulated as an objective, and long-term visions for freshwater in the region to be embedded in the Regional Policy Statement. An exposure draft of the National Policy Statement for Indigenous Biodiversity (NPS-IB) was released in June 2022, and is anticipated to be gazetted in December. RPS Change 1 provides the opportunity to align the RPS with the exposure draft NPS-IB, and Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020 (ANZBS).

269. The provisions for RPS Change 1 have been developed and assessed in an iterative and integrated way to ensure they work together as a full suite of changes to implement a suite of national direction and related regional strategy.

270. Sections 8 and 9 of this report have describe and evaluated the appropriateness of the proposed objectives and the efficiency/effectiveness of the proposed policies and methods. With this assessment, the proposed policies and methods in Change 1 do not generate any cumulative considerations for efficiency and effectiveness that have not already been considered in the sections above.

271. RPS Change 1 has been developed in little over a year. Given the condensed timeframe, officers have worked with mana whenua / tangata whenua as our partners and focussed primarily on NPS-FM implementation, and with officers from the region's territorial authorities to develop appropriate provisions.

272. The objectives and packages of provisions were developed considering major and minor options, working with mana whenua/tangata whenua partners, internal specialists, and external stakeholders. A formal consultation period generated constructive feedback on a draft document and influenced the form of the proposed Change 1. Input from interested stakeholders will continue through the submissions and hearings process.

273. Overall, proposed RPS Change 1 will appropriately implement a suite of national direction, provide clarity to RMA decisions in the Wellington Region, while effectively and efficiently integrating the new and revised approaches. In implementing national direction and existing regional strategy (e.g. WRGF) into the RPS, proposed RPS Change 1 as a whole will generate some additional costs as described in Section 9, but not significant costs in addition to those expected by the national direction. Many costs are not defined at this stage, as the level of cost depends on options considered and selected for regional plans and district plans to implement the RPS.

274. Further, the benefits will outweigh costs in providing a clear and integrated framework of RPS objectives and provisions.

10.0 REFERENCES

275. This report includes relevant references in footnotes throughout the report.

276. In addition to the specific references provided in footnotes, the following materials were also used in the preparation of Change 1 and Section 32 Evaluation Report:

- All relevant Acts, National Policy Statements, National Environmental Standards and Regulations
- Greater Wellington Regional Council regional plans and strategies, regional policy statements
- Regional plans of other regional councils, and city, district plans within Wellington region.

Appendix A – Section 32 RMA

32 Requirements for preparing and publishing evaluation reports

(1) An evaluation report required under this Act must—

(a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and

(b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—

(i) identifying other reasonably practicable options for achieving the objectives; and

(ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and

(iii) summarising the reasons for deciding on the provisions; and

(c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

(2) An assessment under subsection (1)(b)(ii) must—

(a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—

(i) economic growth that are anticipated to be provided or reduced; and

(ii) employment that are anticipated to be provided or reduced; and

(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and

(c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

(3) If the proposal (an amending proposal) will amend a standard, statement, national planning standard, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—

(a) the provisions and objectives of the amending proposal; and

(b) the objectives of the existing proposal to the extent that those objectives—

(i) are relevant to the objectives of the amending proposal; and

(ii) would remain if the amending proposal were to take effect.

(4) If the proposal will impose a greater or lesser prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition

or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.

(4A) If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—

(a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and

(b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.

(5) The person who must have particular regard to the evaluation report must make the report available for public inspection—

(a) as soon as practicable after the proposal is made (in the case of a standard, regulation, national policy statement, or New Zealand coastal policy statement); or

(b) at the same time as the proposal is notified.

(6) In this section,—

***objectives** means,—*

(a) for a proposal that contains or states objectives, those objectives:

(b) for all other proposals, the purpose of the proposal

***proposal** means a proposed standard, statement, national planning standard, regulation, plan, or change for which an evaluation report must be prepared under this Act*

***provisions** means,—*

(a) for a proposed plan or change, the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change:

(b) for all other proposals, the policies or provisions of the proposal that implement, or give effect to, the objectives of the proposal.

Appendix B – NPS-UD requirements addressed

This appendix outlines the parts of the National Policy Statement on Urban Development 2020 (NPS-UD) relevant to the Wellington Regional Policy Statement (RPS). This appendix assists in understanding changes to the Regional Form, Design and Function chapter as a result of this national direction.

The NPS-UD was released in August 2020 which replaced and builds on the former National Policy Statement for Urban Development Capacity 2016. The NPS-UD is designed to improve the responsiveness and competitiveness of land and development markets. In particular, it requires local authorities to provide additional development capacity, so more homes can be built in response to demand. There are four key aspects to the NPS-UD that set specific requirements for both territorial and regional authorities to provide for in their planning documents being:

a. Requiring **well-functioning urban environments** (Policy 1). Requires planning decisions to contribute to well-functioning urban environment which have a minimum set of criteria as outlined in the policy. The criteria include a number of specified minimums that would need to be directed or enabled through the regional and district planning documents.

b. The **intensification provisions** (Policies 3, 4 and 5) seek to improve land-use flexibility in the areas of highest demand – areas with good access to the things people want and need, such as jobs and community services, and good public transport services. These factors are indicators of the best areas for development, and there is strong evidence to demonstrate that reducing constraints on development in these locations would have the biggest impact.

c. **Housing bottom lines** policy (Policy 7) seeks to require housing bottom lines to be set for the short, medium and long term to ensure sufficient housing capacity is provided for.

d. The **responsive planning policy** (Policy 8) seeks to improve land-use flexibility generally by ensuring local authorities have particular regard to plan changes that would add significantly to development capacity as they arise.

The NPS-UD specifically identifies local authorities as tier 1 or 2 if the urban areas within those districts and regions are to experience or are likely to experience medium to high growth. All other districts and regions by default are tier 3 where there is an urban environment within the district. Requirements under the NPS-UD are proportionate to the tier of the local authority. Wellington Regional Council, Wellington City Council, Porirua City Council, Hutt City Council, Upper Hutt City Council and Kāpiti Coast District Council are all Tier 1 local authorities under the NPS-UD.

Each of these aspects is discussed further in the sections below.

1. Well-functioning urban environment

The NPS-UD introduces the concept of "well-functioning urban environment". The meaning of this term is set out in NPS-UD Policy 1 and sets out minimum requirements that have to be provided for through planning decisions. There are several circumstances in the NPS-UD where the contribution to a "well-functioning urban environment" must be considered:

- when making planning decisions (includes plan changes and resource consent decisions)
- when being responsive and making planning decisions on plan changes that add significant development capacity
- when preparing Future Development Strategies.

Relevant provisions for well-functioning urban environments within the NPS-UD are outlined below:

Objective 1: *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

Defined as:
Well-functioning urban environment *has the meaning in Policy 1.*

2. Intensification

The NPS-UD provides direction for urban intensification being enabling of buildings of higher density and height in particular locations that are most suitable for development, being areas with good access to the things people want and need, such as jobs and community services, and good public transport services. The direction provides more prescriptive minimum requirement for tier 1 districts of either 6 stories or in accordance with the Medium Density Residential Standards[184]. There is also applicable direction for tier 3 district (Masterton District Council) which sets general intensification requirements for smaller growing urban areas. The intensification direction under the NPS-UD does not apply to other districts that do not contain an "urban environment" and therefore are not applicable to South Wairarapa and Carterton District Councils. The relevant provisions are outlined below:

Tier 1 (WCC, HCC, UHCC, PCC and KCDC):
Policy 3: *In relation to tier 1 urban environments, regional policy statements and district plans enable:*
(a) In city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and

[184] MDRS provides for the development of up to 3 residential dwellings per property up to a height of 3 stories.

(b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and

(c) building heights of least 6 storeys within at least a walkable catchment of the following:
- *(i) existing and planned rapid transit stops*
- *(ii) the edge of city centre zones*
- *(iii) the edge of metropolitan centre zones; and*

(d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:
- (i) *the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*
- (ii) *relative demand for housing and business use in that location.*

Policy 4: *Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.*

Tier 3 (MDC):
Policy 5: *Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:*

(a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
(b) relative demand for housing and business use in that location.

Part 4 of the NPS-UD states the timing for giving effect to the intensification direction being not later than 2 years after the commencement of the NPS-UD[185]. This requires local authorities to notify any proposed changes to regional or district planning documents no later than 20 August 2022.

3. Housing Bottom Lines

The NPS-UD requires local authorities with jurisdiction over tier 1 or 2 urban environments to produce housing bottom lines. A housing bottom line is the amount of development capacity that is sufficient to meet demand plus the competitiveness margin. For regional councils this means inserting housing bottom lines into regional policy statements for the short, medium, and long term. For territorial authorities the same is required but for district plans. The relevant provisions are outlined below:

Policy 7: *Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and long term in their regional policy statements and district plans.*

Subpart 1, Section 3.6:

1. *The purpose of the housing bottom lines required by this clause is to clearly state the amount of development capacity that is sufficient to meet expected housing demand plus the appropriate competitiveness margin in the region and each constituent district of a tier 1 or tier 2 urban environment.*
2. *For each tier 1 or tier 2 urban environment, as soon as practicable after an HBA is made publicly available (see clause 3.19(1)):*

[185] 20 August 2020

a. The relevant regional council must insert into its regional policy statement:
(i) a housing bottom line for the short-medium term; and
(ii) a housing bottom line for the long term; and

b. every relevant territorial authority must insert into its district plan:
(i) a housing bottom line for the short-medium term is the proportion of the housing bottom line for the short-medium term (as set out in the relevant regional policy statement) that is attributable to the district of the territorial authority; and
(ii) a housing bottom line for the long term that is the proportion of the housing bottom line for the long term (as set out in the relevant regional policy statement) that is attributable to the district of the territorial authority.

3. The housing bottom lines must be based on information in the most recent publicly available HBA for the urban environment and are:

(a) for the short-medium term, the sum of:
(i) the amount of feasible, reasonably expected to be realised development capacity that must be enabled to meet demand, along with the competitiveness margin, for the short term; and
(ii) the amount of feasible, reasonably expected to be realised development capacity that must be enabled to meet demand, along with the competitiveness margin, for the medium term; and

(b) for the long term, the amount of feasible, reasonably expected to be realised development capacity that must [be] enabled to meet demand, along with the competitiveness margin, for the long term.

4. The insertion of bottom lines must be done without using a process in Schedule 1 of the Act, but any changes to RMA planning documents required to give effect to the bottom lines must be made using a Schedule 1 process.

While housing bottom lines will be inserted into the RPS, this change is not part of proposed Change 1 and is rather inserted in accordance with section 55(2)(b) of the Resource Management Act 1991.

4. Responsive planning

The NPS-UD includes the following provisions that require local authorities to be responsive to plan changes that would add significantly to development capacity that is unanticipated or out of sequence. This assists in improving land-use flexibility and opportunities for providing for development capacity where it is appropriate. Generally, this refers to enabling private plan changes to be considered where there is an urban growth development opportunity that is required in order to provide for sufficient development capacity. The relevant provisions are outlined below:

Objective 6: *Local authority decisions on urban development that affect urban environments are:*
(a) *integrated with infrastructure planning and funding decisions; and*
(b) *strategic over the medium term and long term; and*
(c) *responsive, particularly in relation to proposals that would supply significant development capacity.*

Policy 8: *Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:*
(a) *unanticipated by RMA planning documents; or*
(b) *out-of-sequence with planned land release.*

Subpart 2, Section 3.8:

1. *This clause applies to a plan change that provides significant development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release.*
2. *Every local authority must have particular regard to the development capacity provided by the plan change if that development capacity:*
   (a) would contribute to a well-functioning urban environment; and
   (b) is well-connected along transport corridors; and
   (c) meets the criteria set under subclause (3); and
3. *Every regional council must include criteria in its regional policy statement for determining what plan changes will be treated, for the purpose of implementing Policy 8, as adding significantly to development capacity.*

There is a requirement in NPS-UD section 3.8(3) for every regional council to include criteria in its RPS for determining what changes will be treated as adding significantly to development capacity.

Effect of the Responsive Planning provisions

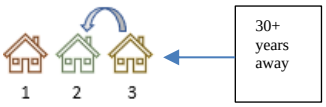
The responsive planning policy in the NPS-UD is to provide direction and certainty when a local authority receives private plan-change. Policy 8 requires local authorities to make responsive decisions where these affect urban environments. Implementing this policy is expected to result in more plan-change proposals being progressed where they meet the specified criteria. This will likely lead to proposals being brought forward for development in greenfield (land previously undeveloped) and brownfield (existing urban land) locations, which council planning documents have not identified as growth areas, or identified growth areas which are a lower priority. Examples of general development scenarios are set out below.

Scenario 1

Out of Sequence e.g. bringing forward development as planned for in a strategic document / District Plan

Scenario 1A

Out of Sequence - bringing forward growth that is identified as being in the future e.g. 30 years away. This may be due to the lack of infrastructure planning beyond this timeframe.



Scenario 2

Unanticipated (eg. Increasing density, flipping from industrial to residential)

e.g. increasing density of planned development to add more capacity, or changing another type of land use to residential.

Scenario 3

Unanticipated
May be contiguous or non-contiguous with an existing urban enablement area

5. Reflection of NPS-UD direction in Change 1

Change 1 seeks to give effect to the NPS-UD direction through various provisions. A cross reference for each of the main aspects of the NPS-UD (described above) and the relevant provisions of Change 1 is provided below:

NPS-UD direction	RPS Objectives	RPS Policies
Well-functioning urban environment	Objective 22 (full)	Policies 30, 31, UD.1, CC.3, FW.4, CC.14, 55, 56, 57, 58 and 67.
Intensification	Objective 22(a), 22(g) and 22(i)	Policy 31
Housing bottom lines	N/A	N/A
Responsive planning	Objective 22(b), 22(g) and 22(i)	Policy 55 and UD.3

Appendix C – NPS-FM requirements addressed

This appendix outlines the parts of the National Policy Statement for Freshwater Management 2020 (NPS-FM) relevant to the Wellington Regional Policy Statement (RPS). This appendix confirms the specific requirements of the NPS-FM for the RPS have been addressed in Change 1.

The appendix also provides the full excerpt of the Te Mana o te Wai for reference.

NPS-FM requirements addressed

Change 1 gives effect to the NPS-FM direction through various provisions. A description of the NPS-FM direction is provided in Section 5.0 of this report.

A cross reference for each of the main aspects of the NPS-FM (described in Section 5.0 of this report) and the relevant provisions of Change 1 is provided below:

NPS-FM direction	RPS Objectives	RPS Policies
How Te Mana o te Wai will be given effect to in the region	Objective 12	Policy 12, Policy FW.3, Policy FW.4, Policy FW.6, Policy FW.7, Policy 14, Policy 15, Policy 17, Policy 40, Policy 41, Policy 18, Policy 44, Policy 45, Policy FW.1, Policy FW.2, Policy FW.7
District Plans to give effect to NPS-FM	Objective 12	FW.3, FW.4, FW.5

Greater Wellington Regional Council response to successive NPS-FM

The NPS-FM requires Council to include objective(s) in the RPS which describes what Te Mana o te Wai means in our region, and to develop freshwater visions, and include these in the RPS as objectives. These objectives have been developed through a collaborative process with mana whenua / tangata whenua as part of the Whaitua Implementation Programme process, and subsequent specific engagements.

Greater Wellington Regional Council has responded to original (2014) NPS-FM with two major parallel regional planning processes. One process involved revising operative regional plans and moving them into a single regional plan, the Proposed Natural Resources Plan. Further amendments will occur over 2022 – 2024 to fully implement that NPS-FM 2020 (for example introducing limits).

The second process, Whaitua Implementation Programmes (WIP), is also a direct response to the NPS-FM. There are five whaitua which collectively cover the geographical extent of the Wellington Region. Each whaitua has a Whaitua Committee tasked with developing WIP to make decisions on the regulatory and non-regulatory proposals for the future of land and water management within that whaitua. Each whaitua is a Freshwater Management Area (FMU) for the purposes of implementing the NPS-FM.

The WIP is to set resource limits and drive for place-based (whaitua) implementation in partnership with iwi and communities, providing a local response to the NPS-FM. The WIPs are completed for three whaitua, with two still in progress. Change 1 is to include freshwater visions (as objectives) for each whaitua (FMU). Changes to the Natural Resources Plan are also required to implement the recommendations in the completed WIP including recommendations about environmental limits. These plan changes must be notified by the end of 2024.

Excerpt, NPS-FM Part 1 – Te Mana o te Wai

1.3 Fundamental concept – Te Mana o te Wai

Concept

(1) Te Mana o te Wai is a concept that refers to the fundamental importance of water and recognises that protecting the health of fresh water protects the health and well-being of the wider environment. It protects the mauri of the wai. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community.

(2) Te Mana o te Wai is relevant to all freshwater management and not just to the specific aspects of freshwater management referred to in this National Policy Statement.

Framework

(3) Te Mana o te Wai encompasses 6 principles relating to the roles of tangata whenua and other New Zealanders in the management of freshwater, and these principles inform this National Policy Statement and its implementation.

(4) The 6 principles are:

(a) Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater

(b) *Kaitiakitanga*: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations

(c) Manaakitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others

(d) Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future

(e) Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations

(f) Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation.

(5) There is a hierarchy of obligations in Te Mana o te Wai that prioritises:

(a) first, the health and well-being of water bodies and freshwater ecosystems

(b) second, the health needs of people (such as drinking water)

(c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

Appendix D – Feedback on draft RPS Change 1

The following tables provide a summary of the feedback received during the development of Change 1, and the officer responses including where this is reflected in proposed Change 1.

Overarching / general comments

Submission Point	Submitter	Provision	Summary of Feedback Received	Response	New draft provisions drafted from original RPS
S12.001	Ngā Hapū o Ōtaki		Ngā Hapū o Ōtaki strongly recommend changing all references to tangata whenua within this document to mana whenua. We also want to ensure that there is a clear link to acknowledge, recognise and provide for Iwi Management Plans and Strategies.	We have received the opposite feedback from Wairarapa iwi. The National Planning Standards states that if there is not regional agreement we must use the term "tangata whenua". However, we do not think this is appropriate given Ngā Hapu's view, and therefore propose that where we are talking about all iwi in the region we use both terms. The RMA requires planning documents recognised by an iwi authority to be taken into account when preparing plans. Through the future review of *Chapter 3.10 Resource management with tangata whenua* and associated provisions, we should review whether / how we can acknowledge, recognise and provide for Iwi Management Plans and Strategies in the RPS, and regional and district plans.	Replace all references to mana whenua or tangata whenua with "mana whenua / tangata whenua". Review uses of the terms "iwi" and "iwi authority" to ensure that these have been used appropriately.
S17.069	Masterton District Council		There needs to be more clarity around any further changes to be made in response to the following (and what the implications are in terms of timing, any transitional changes etc): Whaitua work, the National Policy Statements for FW and UD, local government reforms, and three waters - entity C.	Noted. Addressed in s32 report to some extent. Needs to be clear in our communications when we notify RPS Change 1.	No change.
S23.143	Atiawa ki Whakarongotai Charitable Trust		The Trust is concerned that Anticipated Environmental Results (AERs) have not been amended to reflect the proposed changes to the objectives, policies and methods. The Trust seeks clarity on the decision to not amend or include AERs particularly given monitoring is an integral step (and statutory requirement) in the planning cycle (plan-do-monitor-review). In addition, the Trust seeks clarity on the utilisation of Implementation Plans (as set out in the introductory text of chapter 4.5).	Accepted. AERs will be included in notified version.	See new section 5.2.
S16.061	Kāpiti Coast District Council		We are surprised by much of the suggested regulatory approaches aimed at city and district councils over other (potentially more appropriate) methods available under the Resource Management Act. Of particular concern is the suggestion city and district councils will be required to carry out some of the functions of regional councils in the absence of the legal ability to do so. We recognise district plans must give effect to a regional policy statement, and resource consent decision making must have regard to any relevant provisions of a regional policy statement or proposed regional policy statement. However, these requirements do not give regional councils an unlimited ability to devolve their section 30 functions to city and district councils in their regional policy statements. We would welcome the opportunity to discuss our feedback with you before formal notification of RPS Change 1. We note such an approach would be consistent with the Wellington Regional Triennial Agreement 2019-2022.	Noted. We have looked again at each of the Policies. We have made some amendments to the drafting and are satisfied with the intent of the revised provisions. Section 3.5(4) of the NPS-FM directs the role of TAs in implementation. Changes have been made to identify roles more appropriately. Meeting with KCDC Planning manager (at RPMG)	
S14.062	Ngāti Toa		General comment regarding the methods and the involvement of tangata whenua in the implementation of policies in the Regional Policy Statement: Method 32, 37 and 38. The methods (some more than the others) outlined under the Subject 'Resource Management with Tangata Whenua' should be used and applied to other topics in the RPS. The methods, Method 32, Method 37, and Method 38 are such like and cannot see these spelled out in important topics 'Climate Change', 'Regional Form, design and function', 'Natural Hazards', 'Soils and Minerals'. Suggest adding these methods into these topics.	Agreed. Due to timing constraints we have only just started the work to assess these properly. Method 32 has generally been included where it is needed, but Methods 37 and 38 have not yet been picked up in the new topics.	

Submission Point	Submitter	Provision	Summary of Feedback Received	Response	New draft provisions drafted from original RPS
S23.146	Ātiawa ki Whakarongotai Charitable Trust		Ātiawa ki Whakarongotai thank the regional council for the opportunity to work together on RPS Change 1.	Noted.	
S18.4	Waka Kotahi		The Wellington Regional Growth Framework provides the strategic growth direction for the Region prior to development of the Future Development Strategy for the Wellington-Horowhenua Region. The Future Development Strategy will set the 30-year spatial plan for the Wellington-Horowhenua Region in accordance with the National Policy Statement on Urban Development. Decision requested: Include 'Horowhenua' in paragraph about Wellington Regional Growth Framework.	Accepted in part. WRGF applies to the Horowhenua, but the RPS does not. Clarified in introduction to Chapter 3.9.	See Chapter 3.9.
S23.144	Ātiawa ki Whakarongotai Charitable Trust		The Trust's position is that mana whenua identity is distinct from the community collective identity. As a result the Trust seeks that mana whenua are referred to in their own right. In addition, mana whenua are not stakeholders, the Trust seek that any inadvertent reference is amended to provide for mana whenua (see introductory text of chapter 4.5).	Accepted	Review document to ensure “stakeholders” is not capturing mana whenua. Also – use the terms “partnering with mana whenua / tangata whenua” and “engaging with the community”
S10.003	Wairarapa Iwi		They want consistency in language approach throughout the provisions, and that their feedback on one area (e.g. indigenous biodiversity) is picked up in other places i.e. Use of terms and separate provisions that reflect the higher importance of 'partnering' with Mana Whenua as opposed to 'engage' with community Include overarching policies around Te Rito o Te Harakeke (rather than Mana o Te Taiao) and Te Mana o Te Wai - but also more specific references throughout provisions Mātauranga Māori - need overarching objectives/policies and scattered throughout. RPS needs to support 'holistic' Mātauranga Māori/values-based metrics (as opposed to reductionist metrics) Don't like references to 'bottom lines' - shouldn't be about doing the minimum but about balancing Need to ensure wording across the RPS in policies doesn't restrict where we got to in Ruamahunga Rec 1/2 (rather reflects the Recs) - including payment for and establishment of kaitiaki. Use of definitions/terms - need to ensure they are not restrictive to Māori and reflect Māori values. Can we go back to some of our best legal minds and review the terms they use i.e. Moana Jackson and the UN Declaration of Rights for Indigenous Peoples Use smart policies as much as possible i.e. bring in dates that requires policies/methods to be done Want early engagement - pre-notification on consents to be able to input to the process and for developer to learn meaning/history and values of the land (at the moment when iwi are notified through resource consents there is not much time to consider proposals) Re 'significant sites' all sites are potentially significant - need appropriate time to work with Iwi to identify these (previous work was rushed) On Tangata Whenua vs Mana Whenua – Rangitāne have strongly indicated a preference for the wording tangata whenua	Accepted. Document reviewed and amended to “partnering with iwi” and “engaging with the community”. Elevate the former in hierarchy. Natasha and Heather have used this feedback to influence other topics. Where necessary we will use NPS-FM language, including the term ‘bottom lines’. But accept the point that it shouldn’t be about doing the minimum. We will revisit ‘significant sites’ in NRP review.	A number of changes have been made in response to these specific points.
S10.001	Wairarapa Iwi		Want the RPS to be highly aspirational – to push the RPS to: o where we want to be, not just where we are at now (noting the legal process may bring us back) o to reflect co-governance and our journey towards it – allowing space for Iwi to express Tino Rangitiratanga (noting the RPS process is not currently a co-governance space and is a contested space) o want us to consider how Mana Whakahaere and Mana Whakahono a Rohe might be able to incorporated across RPS. Potential to look into an overarching policy and review policies in relation to the principles of Mana Whakahono a Rohe (want to see a pathway/journey towards Mana Whakahone a rohe reflected in the RPS) o to move from the principle of Kaitiakitanga to Kaitiriao. · Strongly emphasised throughout discussions the importance of whakapapa connection to Atua, not a myth but a direct connection. If Te Taiao is healthy, their people are healthy	These points have largely been reflected in TMotW statements that will be included in the draft. We have embedded Mātauranga across obj/pol/methods.	

Submission Point	Submitter	Provision	Summary of Feedback Received	Response	New draft provisions drafted from original RPS
			· Want Mātauranga framework embedded across the RPS - from objectives, policies to methods · Wanted objective/policies/methods reflecting the broader holistic nature of ecosystems than Te Mana o Te Wai e.g. solutions for freshwater is intrinsically connected to the broader ecosystems/ Te Taiao (e.g.plants). Initially we discussed including Te Mana o Te Taiao but agreed on Te Rito o Te Harakeke to link to the exposure draft of the NPS-IB		
S10.004	Wairarapa Iwi		· Overall supportive of the provisions · Need to ensure equitable distribution of effects - and how to recognise and address those in relation to Māori · Need a policy around protecting Māori Data sovereignty (Rangitāne provided some wording)	Equitable distribution of effects is covered in Policy CC.9: Equity and inclusiveness. Agree Māori data sovereignty should be protected.	Method IM.2 Protection and interpretation of Mātauranga Māori and Māori data By 2025, the Wellington Regional Council in partnership with each mana whenua will develop and uphold tikanga and kawa for Māori data sovereignty, including but not limited to: how Māori data and information is collected, stored, protected, shared and managed; and how mātauranga Māori and other forms of Māori data is analysed and interpreted. *Implementation: Wellington Regional Council*
S12.050	Ngā Hapū o Ōtaki		Method 39: Prepare protocols with ~~for~~ tangata whenua to ensure access to mahinga kai and natural resources used for customary purposes on public and Crown land	Method 39 not in scope of RPS Change 1. The review of this Method should occur as part of RPS review in 2023/24.	
S12.030	Ngā Hapū o Ōtaki		Policy 19: Managing amenity, recreational, cultural and indigenous biodiversity values of rivers and lakes - regional plans	Policy 19 is not in scope of RPS Change 1.	
S14.001	Ngāti Toa		This document comes at the back of a partnership planning Kaupapa agreement Te Rūnanga o Toa Rangatira has signed with the Greater Wellington Regional Council Environment Planning team last year. This agreement enabled our close working relationship with the Environment Planning team in the GWRC and we did give prior feedback to topic leads, in the RPS draft being produced - it is a great opportunity for the Rūnanga to be involved in drafting and creating content for the Regional Policy Statement. Kei te mihi nui to GWRC team that made this partnership possible; as we acknowledge this partnership, we were able to generate a working partnership as part of this agreement which enabled us to be involved at the detailed planning level and boosted our resourcing and Resource Management Planning expertise. This is a major milestone. We are able to provide you with technical content for the draft Regional Policy Statement for the Wellington Regional Council.	Noted.	
S14.015	Ngāti Toa		The wording of Objective 31 can be strengthened to mean: *the demand for mineral resources is met from resources located in close proximity to the areas of demand - in an appropriate way we can reduce its footprint.* The Objective should not encourage further mining, and the wording could somewhat contain the need of mining and its footprint. This objective should not read to encourage mining activities further.	Objective 31 not in scope of RPS Change 1. The review of this Objective should occur as part of RPS review in 2023/24.	
S14.040	Ngāti Toa		*Historic Heritage Policy 21 and Policy 22:* We are unsure whether Policy 21 and 22 make a distinguished note between the historic heritage and Sites and Areas of Significance to Māori (SASM) identification and mapping and protection. They should be separated - or the policy 21 and 22 to be worded to ensure that distinguishing features are identified and comes across in the paragraph.	Historic heritage not in scope of RPS Change 1. The review of these provisions should occur as part of RPS review in 2023/24.	
S13.002	Upper Hutt City Council		Our key fundamental concerns, which are covered in more detail below are: 1. Use of regulatory methods instead of non-regulatory methods; 2. Requiring district plans to include provisions for regional council functions; 3. use of verbs in policies; 4. lack of higher order document or evidentiary support for proposals; 5. timing of changes to indigenous biodiversity provisions. We consider these fundamental issues need to be addressed prior to the notification of the plan change.	To be discussed at RPMG.	

Submission Point	Submitter	Provision	Summary of Feedback Received	Response	New draft provisions drafted from original RPS
			We acknowledge the placeholders and gaps in the draft that are yet to be filled and we look forward to having the opportunity to consider and provide feedback on those once draft provisions have been prepared and provided to the Upper Hutt City Council.		
S13.008	Upper Hutt City Council		We consider that the issues we have raised, particularly critical matters of jurisdiction and practical administration, are fundamental to resolve prior to notification of the Plan change. We would welcome the opportunity to discuss our feedback with you before formal notification of RPS Change 1. We note such an approach would be consistent with the Wellington Regional Triennial Agreement 2019-2022.	RPMG meetings held 28 and 29 July.	
S13.003	Upper Hutt City Council		We are concerned that many draft provisions seek to impose regulatory methods in district plans rather than non-regulatory methods. We are surprised by much of the suggested regulatory approaches aimed at city and district councils over other more appropriate methods available under the Resource Management Act.	Noted. Authors were asked to consider, and changes have been made as a result. For example, the agriculture consideration policy, and provisions around nature based solutions.	
S13.007	Upper Hutt City Council		We are concerned that issues are worded in strong negative language in the absence of any evidence we are aware of to support this strong language. We suggest the issues are written in neutral language.	Noted. Addressed in s32 report.	
S13.001	Upper Hutt City Council		We have had the opportunity to view the feedback from Kāpiti Coast District Council and in principle endorse their detailed comments.	Noted.	
S13.004	Upper Hutt City Council		Of particular concern is the suggestion city and district councils will be required to carry out some of the functions of regional councils in the absence of the legal ability to do so. There are a large number of draft provisions that appear to require the Upper Hutt City Council to address resource management issues in its district plan that fall outside of its statutory functions, powers and duties under the RMA. This includes proposed requirements for district plans to include provisions related to water quality including financial contributions. We recognise district plans must give effect to a regional policy statement, and resource consent decision making must have regard to any relevant provisions of a regional policy statement or proposed regional policy statement. However, these requirements do not give regional councils an unlimited ability to devolve their section 30 functions to city and district councils in their regional policy statements.	Section 3.5(4) of the NPS-FM directs the role of TAs in implementation. Changes have been made to identify roles more appropriately.	
S13.006	Upper Hutt City Council		We also request careful consideration be given to all the verbs used in objectives and policies to ensure their legal meaning under the RMA fits with the requirements of the Act and all relevant higher-level statutory planning documents (for example changing "give particular regard to" to "ensuring"). We have seen a number of instances where this appears to be an issue, hence our recommendation to review the verbs used in all draft objectives and policies with a high degree of planning and legal scrutiny. In additions there is inconsistency of use of terms throughout the draft provisions (eg mana whenua or iwi authorities used seemingly randomly).	Noted. We have looked again at each of the Policies. We have made some amendments to the drafting and are satisfied with the intent of the revised provisions. We will have ongoing consistency checking.	
S23.145	Ātiawa ki Whakarongotai Charitable Trust	3	The Trust seeks that introductory texts are reviewed in accordance with the Trust's suggestions (see Relief Sought - Ātiawa ki Whakarongotai GWRC RPS Change 1). Currently many of the introductory texts fail to adequately identify specific issues for mana whenua relevant to each chapter (this is a statutory requirement).	Noted. We have amended a number of the introductory sections and issues statements to address this point.	
S23.138	Ātiawa ki Whakarongotai Charitable Trust	3	The Trust suggest Regional Council staff officers familiarise themselves with the Kaitiakitanga Plan for Ātiawa ki Whakarongotai [Whakarongotai o te moana, Whakarongotai o te wā]. The Kaitiakitanga Plan sets out our kaupapa (values), huanga (visions), and tikanga (approach) that guide our kaitiakitanga as mana whenua. These should provide more insight and detail regarding specific key concepts and values within the environmental statutory framework.	Noted. Feedback provided captures a lot of the Kaitiakitanga Plan. We are accepting most of the feedback.	
S23.142	Ātiawa ki Whakarongotai Charitable Trust	3	Although the Trust is pleased that mātauranga Māori is being given its due recognition by Regional Council, the Trust stresses that mātauranga Māori and other forms of Māori data must be provided with the appropriate protections. This includes, Māori data sovereignty, including but not limited to the way Māori data is stored, protected, accessed, and shared. The Trust seeks that tikanga are adopted to support Data sovereignty, especially around our mātauranga. The Trust seeks that Regional Council partner with mana whenua to develop tikanga for Māori data sovereignty.	Accepted. New method on partnering with mana whenua to develop tikanga for Mātauranga Māori data sovereignty.	Method IM.2 Protection and interpretation of Mātauranga Māori and Māori data By 2025, the Wellington Regional Council in partnership with each mana whenua will develop and uphold tikanga and kawa for Māori data sovereignty, including but not limited to: (a) how Māori data and information is collected, stored, protected, shared and managed; and

Submission Point	Submitter	Provision	Summary of Feedback Received	Response	New draft provisions drafted from original RPS
					(b) how mātauranga Māori and other forms of Māori data is analysed and interpreted. *Implementation: Wellington Regional Council*
S23.139	Ātiawa ki Whakarongotai Charitable Trust	3	The Trust seeks that Regional Council review the terms used to refer to Māori natural groupings in RPS Change 1. There seems to be inconsistencies across the drafting, tangata whenua, mana whenua, iwi, hapū, are all used, in some instances one term may be appropriate and in others it may not be to appropriate term. The Trust suggests Regional Council commission appropriately qualified people to review this material and provide further guidance. The Trust has used the term mana whenua where appropriate.	Noted. We have reviewed the terms in discussion with Te Hunga Whiriwhiri, and will consider whether a fuller review of terms is needed.	
S23.136	Ātiawa ki Whakarongotai Charitable Trust	3	In principle the Trust support the intent of the provisions to address the degradation of indigenous biodiversity. The Trust is pleased that Regional Council is taking steps to better provide for mana whenua through including reference to mātauranga Māori, mahinga kai values, and generally improving provision for mana whenua involvement in resource management. However, the Trust seeks further reference to mana whenua values and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. The Trust seeks that Regional Council move beyond thinking that limits mana whenua values to 'cultural' or 'spiritual', this philosophy is out-dated and unfairly restricts mana whenua involvement in resource management and decision making processes. Mana whenua have an interest in all parts of te ao Tūroa/the natural world.	Noted. We have reviewed and broadened mana whenua / tangata whenua interests beyond "cultural and spiritual", in particular through the IM and freshwater policies. Other aspects of cultural values are picked up in s32 report.	
S23.132	Ātiawa ki Whakarongotai Charitable Trust	3	In principle the Trust supports the overall intent of the RPS Change 1, to address significant and urgent resource management issues (climate change, indigenous biodiversity, freshwater and urban development). However, the Trust notes that there are further amendments required to provide for Ātiawa ki Whakarongotai values. The Trust seeks that amendments are made to RPS Change 1 in accordance with the relief sought in our pre notification feedback document (Relief Sought Ātiawa ki Whakarongotai GWRC RPS Change 1 Pre-Notification) (enclosed).	Noted. Refer to topic-specific tables.	
S23.1	Ātiawa ki Whakarongotai Charitable Trust	3	In principle, the Trust support the inclusion of these provisions as they set the high-level framework for the proposed changes, that is they set out the reasoning and the issues that the plan is addressing. However, the Trust considers amendments to RPS Plan Change 1 are required to ensure Ātiawa ki Whakarongotai values are enabled and provided for.	Noted. Refer to topic-specific tables.	
S11.001	Kāinga Ora	3	1. Kāinga Ora is generally supportive of Draft Change 1 in that it: a) Incorporates the National Policy Statement on Urban Development 2020 (NPS-UD) requirements to provide for growth in the region, but most importantly, promoting compact and concentrated urban form and densification in the region; b) Promotes for well-functioning and quality urban environments, based around transit-oriented development and connected centres, and a centre's hierarchy; and c) Incorporates Mātauranga Māori and Te Ao Māori in the management and monitoring of indigenous biodiversity, hazard mitigation measures.	Noted.	
S20.1	South Wairarapa District Council	3	Overall, we support some of the intent of what's proposed, and seek further inclusion for the South Wairarapa in some provisions. We support in principle the improved framework for urban development, and significant portions of the Climate Change provisions relating to urban environments. However, we have serious concerns regarding the approach of GWRC at this time. In particular, it is not clear as to how the provisions for Climate Change and Indigenous Biodiversity align with central government guidance/policy. Further, while matters relating to the NPS UD need to be addressed at this time, a full review of the RPS is due in a short period of time. The implication could be a lot of time and money spent engaging in processes that both don't align with central government direction that have to be revisited again, and potentially 'fixed' in several years anyway. Similarly, a robust economic assessment of the costs and benefits of the proposals must be included in the section 32 analysis to ensure that not only are they positive, but also apportioned fairly across the region.	Noted. These concerns are addressed through the section 32 report. Discuss at RPMG meetings.	

Submission Point	Submitter	Provision	Summary of Feedback Received	Response	New draft provisions drafted from original RPS
S19.058	Porirua City Council	3	In our view, the real value of a regional policy statements is to provide policy direction that either does not exist at a national level or exists at a national level but needs to be articulated at a regional level. Council is concerned about the many provisions in this RPS draft that either duplicate or are inconsistent with matters now comprehensively addressed by national direction. In some instances, they duplicate national direction without giving specific guidance in a Wellington Region context. For example: The urban development provisions duplicate a number of the NPS-UD provisions without articulating what they mean in a Wellington Region context; The biodiversity provisions are inconsistent with the draft NPS-IB. Further, as the draft is currently being consulted on and may change before being gazetted meaning there is a risk of being even more inconsistent; and The plantation forestry provisions are inconsistent with the NES-PF. We consider that various provisions are ultra vires in terms of our respective functions under sections 30 and 31 of the RMA, particularly in relation to the discharge of contaminants to land and water, and the management of fresh waterbodies. Further, territorial authorities do not have the capacity or capability to undertake these functions. Many policy chapeaus start with "When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be had to...", Council considers that there needs to be better articulation of the thresholds for when each of these policies should be considered as part of a plan change, and particularly resource consent application. The policies need to articulate when the policy is relevant in terms of the specific scale or types of development and/or activity. The RPS needs to acknowledge that greenfield land supply has a key role to play in achieving competitive land markets and sufficient long-term housing supply. Current RPS policies have contributed to an artificial scarcity of land for urban development and driven up prices. As a general comment, there is a fair amount of duplication across new and amended objectives and policies.	Noted. Refer to individual topic-specific tables. We have reviewed and amended some of the consideration policies to address the 'threshold' issue. We have not had any indication that the RPS policies have created artificial scarcity of land for urban development.	
S8.001	Carterton District Council	3	Supports the position of Masterton and South Wairarapa.	Noted.	
S20.098	South Wairarapa District Council	3	- We also support the submissions from Masterton and Carterton District Councils. - The need to overhaul the RPS substantially prior to a scheduled review, apart from urban growth matters is unclear; - A lack of visible alignment with Government policy; - The need to more clearly demonstrate costs and benefits and where they may fall spatially; - Concern around how to allocate costs fairly and ensure equity and proportionality in the application is maintained, with the focus primarily on the polluter; - More collaborative and inclusive processes to implement the policy direction, particularly from those communities that are potentially disproportionately affected by costs; - Concern that non-regulatory methods will ultimately used for regulatory purposes; - Improved clarity generally on how implementation will work in practice; - Concerns regarding functions in parts of RPS PC1 not aligning with the Resource Management Act; - A desire to have some of the provisions that apply to TAs that are Tier 1, 2 or 3 apply to those 'other' Councils in an enabling, but not compulsory way; - Support for policy interventions with multiple benefits that assist in reaching multiple targets.	Noted. A number of these issues are addressed through s32 report. Noted. We have clarified how the urban development provisions apply across the region – not just in Tier 1 councils.	

Submission Point	Submitter	Provision	Summary of Feedback Received	Response	New draft provisions drafted from original RPS
S8.003	Carterton District Council	3	Document as a whole is good, but here and there needs to be more site-specific, e.g. transport emissions reductions, intensification. Need clarity on what applies where and in some cases a more catchment-based approach is necessary rather than applying more 'urban' provisions across the whole region.	We would be happy to explore with you how a catchment-based or site-specific approach would work.	
S14.072	Ngāti Toa	4.1	Policy 6 recognises the significance of Porirua Harbour. This could be further discussed.	Coastal chapter not in scope of RPS Change 1. A fuller review in 2024 will pick this up. This policy has been given effect to in the NRP, and will be addressed through NRPC1.	
S23.82	Ātiawa ki Whakarongotai Charitable Trust	Policy 48 & 49:	The purpose of RPS Change 1 is to address the requirements of the National Policy Statement on Urban Development. Out of efficiency, Regional Council has taken the opportunity to incorporate additional changes to the RPS, including this changes to Policy 48 and Policy 49. Given the significance of Policy 48 and Policy 49 to mana whenua, the Trust considers that any proposed amendments to these policies through RPS Change 1 must be developed with mana whenua as partners. Working this way will enable adequate consideration of a re-imagined approach to resource management decision-making with Ātiawa ki Whakarongotai and Regional Council. As such, the Trust is opposed to Policy 48 and Policy 49 until such time as Regional Council and mana whenua are able to address Policy 48 and Policy 49 together. The Trust note that parts of chapter 3.10 - resource management with tangata whenua, no longer meet expectations; the Trust would like to work in partnership to address this through an appropriate process. Decision requested: Amend Explanation for Policy 48 as follows: The Treaty of Waitangi (the Treaty) is a founding document of New Zealand. There are Māori and English versions of the Treaty, with most Māori signing the Māori language version. It encompasses guiding principles for the engagement of iwi with local authorities in relation to resource management. Tangata whenua of the region maintain the primacy of the Māori language version of the Treaty, which is also supported by ~~in accordance with~~ the international rule of contra preferendum. As a result of the different content of the two versions of Te Tiriti ~~The Treaty principles are derived from the Treaty as a whole, its underlying meaning, intention and spirit. There is no definitive list of Treaty principles. Accordingly,~~ Treaty principles have evolved through statements of the Court of Appeal, Waitangi Tribunal and Government. While there is no definitive list of Treaty principles, m~~M~~any of the principles are directly relevant to resource management matters, as they have arisen out of claims before the Waitangi Tribunal concerning land, water and other natural resources. As such the Treaty principles guide engagement between iwi and local authorities. In addition the Trust seek that the operative wording of the explanation following the suggested amendments are deleted.	Noted, and accepted in part. Deleting or amending these explanations created an inconsistency in the plan change in terms of scope. We agree that making changes to these provisions before we can work together on them is inappropriate.	Reinstated Policy 48 and 49 explanations, and therefore Policies 48 and 49 fully out of scope of RPS Change 1. Review all of chapter 3.10 and related policies and methods with our partners.
S14.050	Ngāti Toa	Policy 48:	*Policy 48 Principles of the Treaty of Waitangi* provides a generic explanation what the applicants need to provide and what the consideration would be from the perspective of resource consent issuer. Deed of Settlement Acts should be clause (c) and any other evidence that are provided such as, Cultural Impact Assessments and iwi environmental management plans.	Noted, and accepted in part. Deleting or amending these explanations created an inconsistency in the plan change in terms of scope. We agree that making changes to these provisions before we can work together on them is inappropriate.	Reinstated Policy 48 and 49 explanations, and therefore Policies 48 and 49 fully out of scope of RPS Change 1. Review all of chapter 3.10 and related policies and methods with our partners.
S14.073	Ngāti Toa	Policy 48 & 49:	Explanations for Policy 48 (Principles of the Treaty of Waitangi) and Policy 49 (Recognising and providing for matters of significance to tangata whenua) have been removed. These are beneficial explanations which provide greater context for policies. These explanations discuss how Māori values and sites of significance should be considered. If these explanations are going to be put somewhere else there should be guidance on where to find them.	Noted, and accepted in part. Deleting or amending these explanations created an inconsistency in the plan change in terms of scope. We agree that making changes to these provisions before we can work together on them is inappropriate.	Reinstated Policy 48 and 49 explanations, and therefore Policies 48 and 49 fully out of scope of RPS Change 1. Review all of chapter 3.10 and related policies and methods with our partners.
S16.53	Kāpiti Coast District Council	Method 1:	Oppose: We are also concerned that any intention to hold city and district councils accountable for discharges of contaminants into, or from, our stormwater networks by third parties, or the improvement of waterbodies as a result of third parties discharge of contaminants is not lawful. Under section 338, liability for an offence sits with the person "who contravenes, or permits a contravention" of the Act. City and district councils do	Section 3.5(4) of the NPS-FM directs the role of TAs in implementation. Changes have been made to identify roles more appropriately.	Refer to relevant topic-specific tables.

Submission Point	Submitter	Provision	Summary of Feedback Received	Response	New draft provisions drafted from original RPS
			not permit the discharge of contaminants to the environment under Section 15 of the RMA and therefore should not be held criminally liable for it if others breach contaminant discharge requirements. Decision requested Delete all draft and existing freshwater management requirements for district plans throughout Draft RPS Change 1. Delete methods specifying joint processing of resource consents. Establish relationships between regional, city and district council resource consents departments via non-regulatory methods outside of the RPS.	We have looked again at each of the Policies and Methods. We have made some amendments to the drafting and are satisfied with the intent of the revised provisions.	
S23.111	Ātiawa ki Whakarongotai Charitable Trust	Method 1:	The Trust opposes the wording of Method 1. District councils should be encouraged to amend their district plans to give effect to RPS Change 1 as soon as reasonably practicable. Despite the proposed provisions having legal effect from the date of public notification of RPS Change 1, the extent of this effect in creating material positive environmental benefit is of concern to the Trust given amendments won't be made to district plans until they have amended their plans. The timeframe for a plan change process is generally protracted and drawn out, therefore current environmental practices may persist. Decision requested Amend Method 1 as follows: Method 1: District plan implementation The process to amend district plans to implement policies 1, 3, 4, 7, 8, 11, FW.1, FW.2, 15, 21, 22, 23, 24, IE1, 25, 26, 29, 30, 31, UD.1, 32, 34, UD.2, CC.1, CC.2, CC.3, CC.4, CC.5, CC.6, CC.7, and CC.8 will commence as soon as reasonably practicable. ~~on, or before, the date on which the relevant council commences the ten year review of its district plan, or a provision in a district plan, pursuant to section 79 of the Resource Management Act 1991.~~	Accepted in part. Some of these policies are required to be implemented by a specific date and therefore we should provide for those.	Method 1: District plan implementation The process to amend district plans to implement policies 1, 3, 4, 7, 8, 11, FW.1, FW.2, 15, 21, 22, 23, 24, IE.1, 25, 26, 29, 30, 31, UD.1, 32, 34, UD.2, CC.1, CC.2, CC.3, CC.4, CC.5, CC.6, CC.7, and CC.8 will commence as soon as reasonably practicable, unless otherwise specifically directed within the policy. ~~or before, the date on which the relevant council commences the ten year review of its district plan, or a provision in a district plan, pursuant to section 79 of the Resource Management Act 1991~~.
S23.112	Ātiawa ki Whakarongotai Charitable Trust	Method 2:	The Trust opposes the wording of Method 2. The regional council should be encouraged to amend their regional plan to give effect to RPS Change 1 as soon as reasonably practicable. Despite the proposed provisions having legal effect from the date of public notification of RPS Change 1, the extent of this effect in creating material positive environmental benefit is of concern to the Trust given the timeframe for a plan change process is generally protracted and drawn out, therefore current environmental practices may persist. Decision requested Amend Method 2 as follows: Method 2: Regional plan implementation The process to amend regional plans to implement policies 2, 3, 5, 6, 7, 8, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, IE.2, 25, 26 and 29 will commence as soon as reasonably practicable. ~~on, or before, the date on which Wellington Regional Council commences the ten year review of its regional plans, or provisions in a regional plan, pursuant to section 79 of the Resource Management Act 1991.~~	Accepted in part. Some of these policies are required to be implemented by a specific date and therefore we should provide for those.	Method 2: Regional plan implementation The process to amend regional plans to implement policies 2, 3, 5, 6, 7, 8, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, IE.2, 25, 26 and 29 will commence as soon as reasonably practicable unless otherwise specifically directed within the policy. ~~or before, the date on which the relevant council commences the ten year review of its district plan, or a provision in a district plan, pursuant to section 79 of the Resource Management Act 1991~~.
S16.54	Kāpiti Coast District Council	Method 3:	Under Method 4: The RPS and regional plans are the appropriate methods to address freshwater management. We do not consider it appropriate to attempt to place regional council functions, powers, duties and responsibilities on city and district councils unless a formal transfer of powers is made under section 33 of the RMA. Regional councils have at their disposal the legal ability to impose regional land use methods to address these matters, including via rules and standards in its regional plans. We note when considering applications for resource consents, city and district councils are already required to have regard to regional policy statements or proposed regional policy statements under section 104(1)(b)(v) of the RMA. We also note city and district councils are already required to have particular regard to a regional policy statement or proposed regional policy statement when making recommendations on notices of requirements under section 171(1)(a)(iii). We do not consider it appropriate or good resource management practice for an RPS to duplicate requirements that are already set out under the Act.	Section 3.5(4) of the NPS-FM directs the role of TAs in implementation. Changes have been made to identify roles more appropriately.	No change.

Submission Point	Submitter	Provision	Summary of Feedback Received	Response	New draft provisions drafted from original RPS
S10.024	Wairarapa Iwi	4.5.2	Method 15 o Make stronger to be more effective. o Discussion around forestry, can come down to financial discussion. Many other benefits regarding natives for public spaces. Why aren't we growing more indigenous plants? o Can there be a cascade like for hazards? If seeking to enhance, prioritise natural solutions.	Method 15 is not in scope for RPS Change 1. The review of this Method should occur as part of RPS review in 2023/24.	
S23.130	Ātiawa ki Whakarongotai Charitable Trust	Appendix 3: Definitions	The Trust suggests that the definition of marae be updated. The Trust consider this in scope as RPS Change 1 involves updating marae and papakāinga provisions in accordance with the NPS-UD. The Trust requests Regional Council support mana whenua to develop the definition of marae more widely within our hapū and iwi. The Trust suggest that the definition of papakāinga be updated. The Trust consider this is in scope of RPS Change 1 as it relates to updating marae and papakāinga provisions in accordance with the NPS-UD. The Trust requests Regional Council support mana whenua to develop the definition of marae more widely within our hapū and iwi. Decision requested Amend definitions as follows: Marae: communal meeting places where ~~significant~~ events are held and decisions made. Marae are important cultural institutions, facilities and provide a base for whānau, hapū and iwi gatherings. The marae enables and enhances mana whenua values and philosophy to be reaffirmed. Papakāinga: A village settlement based on traditional papakāinga values developed by Māori whānau, hapū, iwi or Māori entity for Māori. Papakāinga include all activities necessary for the wellbeing of the residents.	Accepted in part. Each iwi may have their own definition of these two terms, so we should provide for them to work with their district council to ensure they are defined appropriately where necessary, rather than adopting a region-wide definition through the RPS.	Delete definitions of Marae and Papakāinga.

Climate change – general and objectives

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
General						
S10.021	Wairarapa Iwi	3.1 Climate Change	3.1A	Decision requested: · Should include specific Māori provisions to reflect the Emission reduction plan and draft National adaptation plan(resulted in 'placeholder' objective CC.6 in draft) · Need to ensure an equitable transition for Māori (referred to the Te Pou a Rangi - climate commission report - that includes: "Iwi/Māorito develop a strategy to advance a Māori-led approach to an equitable transition for Iwi/Māori and the Māori economy") · Support nature based solutions· Want strong direction for planting natives of exotic forests re mitigation · Want stronger direction for agricultural emission reduction	Equitable transition for Māori addressed in IM policy and objective. Central Government will be developing a Just transition Māori Strategy	
S10.017	Wairarapa Iwi	3.1 Climate Change	3.1A	Decision requested: · A lot of cultural sites of significant are coastal and are likely to be directly affected by climate change - this needs to be addressed in policies (will provide greater weight if directed from RPS not just NRP) · Climate change - clause about equitable funding. For Māori land - there may be limited ways can respond to sea level and climate change. Wouldn't want to see limit on response. · Support notion to avoid development and intensifying in areas that would rely on floodbanks, and have known residual risk from flooding.	Noted, and several provisions address the concerns raised here.	
S20.2	South Wairarapa District Council	3.1 Climate Change	3.1A	In principle, reductions of greenhouse emission are accepted as necessary, urgent, and change in the way we manage the natural and built environment is required immediately. The equitable allocation of the costs of reductions is supported, although this needs more detail to demonstrate that this can be	Noted. Particular responses: The highest contributors to the Regional greenhouse gas emissions are:	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				applied in practice. We support nature-based solutions to offset greenhouse gasses, but note that these have the potential to displace rural economies and communities if equity is not maintained. Offsets of carbon emissions should not rely on rural economies picking up the shortfall of urban reductions. Similarly, we are of the view that 'at source' reductions should be the primary approach used. There is support for infrastructure and development that is resilient to climate change and avoidance of development affected by climate change in the longer term. The framework would benefit from more specific reference to particular hazards and timeframes. Absolutely support people and community focussed and led responses to climate change, particularly to ensure intra-regional equity. Similarly, support the development and building of iwi engagement and capability in these processes. There is concern about, the scope of these provisions, the uncertainty about how they relate to Government targets, and how truly equitable the implementation of some of the approaches will be. There is a lack of supporting information about the approaches impacts on the Wairarapa communities. We have particular concern around the potential for agricultural emissions to fall under the regional plan in the future (while not currently a method proposed), the extent of afforestation in the Wairarapa region and the consequential impacts on the regional economy and communities. It is unclear as to why only transport, agriculture and stationary energy are the only emitters targeted. The costs and benefits (and on whom) are not clearly demonstrated at this stage. The nature of traffic in the district as agricultural, passing through, or tourism is unlikely to lend itself to significant reductions. Anecdotally, we are seeing a noticeable increase in electric cars for these journeys. The section 32 analysis needs to appropriately and in sufficient detail identify and quantify costs and benefits, including economic and social impacts on rural communities. Inequitable distribution of costs are not acceptable.	• transport 38% • agricultural 34% • stationary energy 18% • waste 5% • industry 4%. Some of the feedback about cost/benefit will be addressed is Section 32.	
S23.134	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	3.1A	Decision requested: The Trust supports the intent of the provisions that recognise and address the impacts of climate change on the environment. The Trust are pleased that this chapter recognises te ao Māori and mātauranga Māori. Many western approaches and concepts to address climate change are founded upon indigenous knowledge, including mātauranga Māori, which Māori have affirmed for generations. Mātauranga Māori and indigenous knowledge are critical to informing resource management issues that the natural world faces today.	Noted	
S25.002	Wellington Water	3.1 Climate Change	3.1A	Decision requested: "Status quo approaches to resource management is another issue. A new approach will be required to address the issues and achieve the objectives and the RPS should be explicit about this. Also helpful to be explicit about whether we are still trying to avoid climate change, or are we moving to adaption or to mitigation or a combination of the above? Even if the answer is just repeating a national plan. Comment: this section seems very quiet on mana whenua."	The suggested addition not included. In part this is addressed in the overarching issues. Other consent are noted.	
S14.003	Ngāti Toa	3.1 Climate Change	3.1A	Decision requested: We note that there is placeholding introductory text to be coming for this Objective. This text will be crucial to express the different impacts our whānau and communities will face from Climate Change.	Noted	
Issue 1						
S23.5	Ātiawa ki Whakarongot	3.1 Climate Change	Issue 1:	The Trust supports the inclusion of this provision. The Trust identifies a minor error, the wording impacting on natural hazards, could be better worded as	Suggested wording included	<u>Greenhouse gas emissions must be reduced significantly, immediately and rapidly</u>

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
	ai Charitable Trust			increasing the occurrence and severity of natural hazards or exacerbates natural hazards. Decision requested: Immediate, rapid, and large-scale reductions in greenhouse gas emissions are required to limit global warming to 1.5°C, the threshold to avoid catastrophic impacts on the natural environment, the health and well-being of our communities, and our economy. Extreme weather events and sea level rise are already impacting our region, including on ~~natural hazards~~, biodiversity, and water quality and availability and increasing the occurrence and severity of natural hazards. Historical emissions mean that we are already locked into continued warming until at least mid-century, but there is still an opportunity to avoid the worst impacts if global net anthropogenic CO2 emissions are reduced by at least 50% from 2019 levels by 2030, and carbon neutrality is achieved by 2050. In the Wellington Region, the main sources of greenhouse gas emissions are transport (39% total load in 2018-19), agriculture (34%), and stationary energy (18%).		Immediate, rapid, and large-scale reductions in greenhouse gas emissions are required to limit global warming to 1.5°C, the threshold to avoid catastrophic impacts on the natural environment, the health and well-being of our communities, and our economy. Extreme weather events and sea level rise are already impacting our region, including on biodiversity, water quality and availability, and increasing the occurrence and severity of natural hazards. Historical emissions mean that we are already locked into continued warming until at least mid-century, but there is still an opportunity to avoid the worst impacts if global net anthropogenic CO2 emissions are reduced by at least 50 percent from 2019 levels by 2030, and carbon neutrality is achieved by 2050. In the Wellington Region, the main sources of greenhouse gas emissions are transport (39 percent total load in 2018-19), agriculture (34 percent), and stationary energy (18 percent).
S17.2	Masterton District Council	3.1 Climate Change	Issue 1:	Agree with the goal to reduce emissions – this may be achievable in a Tier 1 Council area, but for a rural area in the Tier 3 category (NPSUD) this may not be achievable because of the economy being reliant heavily on agriculture and transport for its survival.	Noted	
S25.003	Wellington Water	3.1 Climate Change	Issue 1:	The introduction to the issues is confusing and reads like there will be two separate lists, one for mana whenua and one for the region. Decision requested: The following climate change issues are both regionally significant ~~issues,~~ and ~~the issues of significance~~ significant to the Wellington region's iwi authorities ~~for climate change are~~:	Not included. We need to follow an existing RPS format. All of the existing issue statement have same lead n sentence.	
S9.4	Hutt City Council	3.1 Climate Change	Issue 1:	Decision requested: This should explicitly tie into New Zealand's nationally determined contribution and obligation to meet the national zero carbon targets, as this is intended to be giving effect to national direction. Alternatively could reference a regional climate change strategy.	Decision will be made by Council as to what greenhouse gas targets are adopted as part of Objective CC.2	
Issue 2						
S23.6	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	Issue 2:	The Trust seek reference to impact of climate change on mana whenua values, the threat of climate change can exacerbate existing issues and pressures for mana whenua. Decision requested: Climate change is placing significant additional pressure on species, habitats, ecosystems, and ecosystem processes, especially those that are already threatened or degraded, further reducing their resilience, and threatening their persistence. This, in turn, reduces the health of natural ecosystems, affecting their ability to deliver the range of ecosystem services, such as carbon sequestration, natural hazard mitigation, erosion prevention, and the provision of food and amenity, that support our lives and livelihoods and enable mana whenua to exercise their way of being in the Te Ao Tūroa, the natural world.	Amended accordingly	Climate change and the decline of ecosystem health and biodiversity are inseparably intertwined Climate change is placing significant additional pressure on species, habitats, ecosystems, and ecosystem processes, especially those that are already threatened or degraded, further reducing their resilience, and threatening their persistence. This, in turn, reduces the health of natural ecosystems, affecting their ability to deliver the range of ecosystem services, such as carbon sequestration, natural hazard mitigation, erosion prevention, and the provision of food and amenity, that support our lives and livelihoods and enable mana whenua to exercise their way of being in the Te Ao Tūroa, the natural world.
Issue 3						
S23.7	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	Issue 3:	The Trust support in principle Issue 3. The Trust seek reference to mahinga kai which are increasingly under pressure from the impacts of climate change due to being located in sensitive environments. Mahinga kai provided indicators for the overall health of the ecosystem (including the impacts of climate change)	Included mahinga kai	The risks associated with natural hazards are exacerbated by climate change The hazard exposure of our communities, land, infrastructure, food (including mahinga kai), and water

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				therefore should be considered when planning for and decision-making in regards to natural hazards and climate change. Decision requested: The hazard exposure of our communities, infrastructure, food (including mahinga kai), and water security is increasing because of climate on a range of natural hazards. Traditional approaches to development that have not fully considered the impacts on natural systems, and our over-reliance on hard engineered protection works, will ultimately increase the risk to communities and the environment as built protection becomes overwhelmed and uneconomic to sustain.		security is increasing because of the effect of climate change on a range of natural hazards. Traditional approaches to development that have not fully considered the impacts on natural systems, and our over-reliance on hard engineered protection works, which will inevitably become overwhelmed and uneconomic to sustain, will ultimately increase the risk to communities and the environment.
S18.1	Waka Kotahi	3.1 Climate Change	Issue 3:	Include climate change for clarity. Decision requested: The hazard exposure of our communities, infrastructure, food, and water security is increasing because of climate change on a range of natural hazards.	Included 'change'	
S24.003	Wellington City Council	3.1 Climate Change	Issue 3:	Wordsmithing Decision requested: The hazard exposure frequency of our communities, infrastructure, food, and water security is increasing because of the effect of climate on a range of natural hazards.	Included 'the effect of'	
S25.004	Wellington Water	3.1 Climate Change	Issue 3:	"Should land be included as being exposed to the hazards in the top line? Have corrected a couple of typos" Decision requested: The hazard exposure of our communities, land, infrastructure, food security, and water security is increasing because of climate change on a range of natural hazards.	Did not include 'security' , included 'land'	
Issue 4						
S23.8	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	Issue 4:	The Trust support the inclusion of Issue 4. The Trust note a minor spelling error, 'urupa' should be spelt 'urupā'.	This relates to Issue 5 – amended	The impacts of climate change will exacerbate existing inequities The impacts and costs of responding to climate change will not be felt equitably, especially for Māori. Some communities have no, or only limited, resources to enable mitigation and adaptation and will therefore bear a greater burden than others, with future generations bearing the full impact.
S14.004	Ngāti Toa	3.1 Climate Change	Issue 4:	Decision requested: [Issues] 3.1.A 4 and 5are connected but yet still, they seem to be disconnected the way they are worded. Under the Objective [Issue?] 3.1.A 4 'The impacts and costs of responding to climate change will not be felt equitably.' This is more so for iwi and Māori and needs to be clearer in the text to say, ' ...will not be felt equitably, especially iwi and Māori.' If the policy intention of the Objective 3.1.A 4 was to highlight inequities, this can also be mentioned under the Objective 3.1.A 5. Then the Objective could reflect the inter-racial and inter-generational inequities that are generated within the Resource Management System and its decision-making mechanisms, which will in return impact more of our communities when dealing with Climate Change.	Amended	
S9.5	Hutt City Council	3.1 Climate Change	Issue 4:	Decision requested: It is unclear how the resource management system can address this.	Noted	
Issue 5						
S12.005	Ngā Hapū o Ōtaki	3.1 Climate Change	Issue 5:	Decision requested: (NHoŌ supportive of these statements)	Noted	Climate change threatens tangible and spiritual components of Māori well-being
S23.9	Ātiawa ki Whakarongot	3.1 Climate Change	Issue 5:	The Trust support the inclusion of issue 5.	Noted	Climate change threatens both the tangible and spiritual components of Māori well-being, including Te Mana o

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
	ai Charitable Trust					Te Wai and Te Rito o Te Harakeke, mahinga kai, and taonga species, and the well-being of future generations. Significant sites for Māori, such as marae, wāhi tapu and urupā, are particularly vulnerable as they are frequently located alongside the coast and fresh waterbodies.
S24.004	Wellington City Council	3.1 Climate Change	Issue 5:	Issue 6: The statement that social inertia and competing interests are the biggest issues to overcome is arguable. A "lack of understanding" described in this paragraph is not the same as social inertia or competing interests. From a socio-economic viewpoint, the main issue is a lack of incentives for people and businesses to change behaviour. These incentives can be prices (e.g. ETS), regulation, social pressure etc. From a planning viewpoint, the main issue is that the global externalities of greenhouse gas emissions are not fully internalised to local resource use. Decision requested: Issue 6: Suggested alternative wording, something like: People and businesses need a range of tools to transition to a low-emission future. The current mix of regulation, emissions markets, education and social pressure is not currently enough for people and businesses to meet New Zealand's greenhouse gas reduction targets and to fully adapt to climate change.	This comment relates to Issue 6. The feedback not included. In part it is implied.	
S19.4	Porirua City Council	3.1 Climate Change	Issue 5:	PCC generally supports these issue statements, but in regard to issue 6, we question whether addressing social inertia is something an RPS can address. What does this link through to in terms of a method e.g. non-regulatory methods such as education etc?	Regarding Issue 6, there are relevant Methods such as *Method CC.1: Climate change education and behaviour change programme* and *Method CC.10: Establish incentives to shift to active and public transport – non-regulatory*	
Issue 6						
S9.6	Hutt City Council	3.1 Climate Change	Issue 6	Decision requested: It is unclear how the resource management system can address this	Though supporting education and behavioural change programmes, as well as establishing the range of incentives to support shift to multimodal transport.	Social inertia and competing interests need to be overcome to successfully address climate change Many people and businesses lack an understanding of the connection between their actions, greenhouse gas emissions, climate change, the ways that climate change will impact their lives and businesses, and the changes that they can make to help the transition to a low-emissions and climate-resilient future. Social inertia and competing interests are the biggest issues to overcome to address climate change.
Table 1A						
S23.10	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	Table 1A:	While the Trust in principle supports the inclusion of climate change provisions, especially those the recognise and provide for mana whenua and te ao Māori, the Trust is concerned that the table indicated the relationship between Objective CC.6, Policy CC.19 and the Methods are inadequate. As they are drafted the relevant Methods lack support and recognition of the role of mana whenua, they do not provide for the intent of the objective and policy. The Trust suggest that a similar method such as IM.1 Integrated Management - ki uta ki tai be drafted to support this policy framework for climate change, with an amended subclause (f) to ensure that mana whenua maintain sovereignty over their data and mātauranga. In summary the Trust supports the intent of Objective CC.6 and the supporting planning framework, however, the wording of the provisions require amendments. In addition, as it is drafted the applicable Methods focus on the rural sector, while the Trust acknowledge that the rural sector should represent a significant part of the climate change response, there is inadequate reference to mana whenua to give effect to the policies and objective.	The Trust's concerns have been reflected in the updated provisions.	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				Please refer to the methods in the table for further comments and suggested amendments.		
S12.007	Ngā Hapū o Ōtaki	3.1 Climate Change	Table 1A:	Under CC.5 methods: Q? Where is community-led and urban climate change adaptation strategies Not just Rural and Agriculture - should that also be included here? Decision requested: Under CC.5 methods: Q? Where is community-led and urban climate change adaptation strategies Not just Rural and Agriculture - should that also be included here?		
S24.005	Wellington City Council	3.1 Climate Change	Table 1A:	The current version of this RPS Change 1 missed out some proven emissions reduction initiatives such as densification, vehicle fuel efficiency, vehicle scrappage schemes, bio-fuel mandates, congestion pricing, ICE vehicle ban, and hydrogen fuels. Decision requested: We recommend that more provisions are added in this RPS Change 1 to support and/or enable densification, improved vehicle fuel efficiency, vehicle scrappage schemes for low-income households, bio-fuel mandates, and the use and production of hydrogen fuels for the Councils. The current version of this RPS Change 1 also seems to be silent about congestion pricing and other road pricing tools. More provisions on road pricing tools are required so that it enables the Councils to apply these emissions reduction tools. Central governments (including New Zealand) as well as many regional governments across the world (including New South Wales, Victoria, South Australia, and Australian Capital Territory) have agreed to convert their owned or leased car and van fleets to zero emission vehicles by 2035 at the latest. We think the current version of this RPS Change 1 could have followed the footstep of other regional governments across the world set some targets or provisions in this regard. Please see the full list of countries and regional governments that signed the declaration at COP26 here: https://www.gov.uk/government/publications/cop26-declaration-zero-emission-cars-and-vans/cop26-declaration-on-accelerating-the-transition-to-100-zero-emission-cars-and-vans	The intent of many policies do cover the proposed suggestions. However, some such as hydrogen are not singled out due to commercial implications. Also some suggestions are not in the remit of the RPS such as ICE ban or congestion pricing.	
Objective CC.1						
S23.11	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	Objective CC.1	The Trust in principle support Objective CC.1.	Support noted	Objective CC.1 By 2050, the Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of: (a) sustainable air, land, water and coastal management, (b) well-functioning urban environments and *rural areas*, and (c) well-planned infrastructure.
S16.2	Kāpiti Coast District Council	3.1 Climate Change	Objective CC.1	Oppose: We consider the methods identified to achieve this objective are unlikely to be effective. From a transport perspective, the National Emissions Reduction Plan 2022-25 and associated emissions budgets (covering 2022 - 2035) identify a route map to 2035, but funding mechanisms do not respond quickly and are not necessarily aligned with growth strategies and timing. As an example, funding has not been successfully obtained in Kāpiti to provide the infrastructure to support mode shift. Our Council received no walking and cycling funding in the 2021-2024 National Land Transport Programme funding round. This leaves Council in a situation where it either does not provide this infrastructure, or is in the position of having to fully fund this infrastructure in the context of other competing and necessary infrastructure requirements. Funding and support at the regional and national level for equitable access to public transportation across our district has not been forthcoming to date. Our Ōtaki community in particular is not well served in this respect, and without such	Redrafted for better focus as a future state 2050 outcome. The content has been split into 2 objectives and formatted for better clarity, responding to feedback that there were a number of concepts contained within the original single objective. The objective now refers to matters that are able to be influenced within an RMA context, i.e., management of natural resources, urban and rural land use and infrastructure planning.	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				support any meaningful mode shift will be unable to occur. Successful implementation of this objective will require a supporting leadership role for the regional council in the RPS, rather than a directive role for territorial authorities that is unlikely to be successful. Decision requested: Oppose: Either amend Objectives CC.1 and CC.2 to ensure the targets are realistic and achievable within the timeframes, or amend the methods to provide a stronger advocacy role to secure appropriate funding for delivering infrastructure that supports mode shift. Ensure the methods intended to achieve this objective are within the legal remit of city and district councils under the RMA.	The new objective CC.1A splits out the issue of fairness and equity, and now expresses this in the context of RMA well-being language.	
S17.3	Masterton District Council	3.1 Climate Change	Objective CC.1	Agree - the review of the WCDP will reflect this.	Support noted	
S20.3	South Wairarapa District Council	3.1 Climate Change	Objective CC.1	Support in principle, but improved clarity required on what equity means. In addition, the terms 'well functioning rural environment' is not familiar and requires definition. Is this meant to include centres that aren't defined as 'urban environments'?	The content has been split into 2 objectives and formatted for better clarity, responding to feedback that there were a number of concepts contained within the original single objective. The new objective CC.1A splits out the issue of fairness and equity, and now expresses this in the context of RMA well-being language.	
S19.5	Porirua City Council	3.1 Climate Change	Objective CC.1	Objective CC.1 needs to be reworded as an objective rather than an action i.e. as a future state, "The Wellington Region is a low-emission and climate resilient region..." Also, by what timeframe? How will this be achieved? Can this be done at a regional level? There are considered insufficient levers at a regional/local level to reduce emissions from the existing vehicle fleet to this extent, and many potential measures require national regulation such as subsidies for electric vehicles, increased fuel taxes etc. Further, district plans can only address future use, development and subdivision. Transforming urban land use will take decades. Inclusion of immediate here has a huge impact on consenting. How is this appropriate and justified? Decision requested: Objective CC.1 needs to be reworded as an objective rather than an action i.e. as a future state, "The Wellington Region is a low-emission and climate resilient region..."	Redrafted for better focus as a future state 2050 outcome. The objective now refers to matters that are able to be influenced within an RMA context, i.e., management of natural resources, urban and rural land use and infrastructure planning.	
S25.005	Wellington Water	3.1 Climate Change	Objective CC.1	Decision requested: This objective may benefit from a restructuring as it reads like three separate objectives, one about low emissions and climate resilience, one about mitigation and adaption and one about transition and equity. This means that the outcome sought by the objective is unclear, is it integrated outcomes or rapid/large reduction?	The content has been split into 2 objectives and formatted for better clarity, responding to feedback that there were a number of concepts contained within the original single objective. The new objective CC.1A splits out the issue of fairness and equity, and now expresses this in the context of RMA well-being language.	
S14.005	Ngāti Toa	3.1 Climate Change	Objective CC.1	Decision requested: This objective is supported in part that it may not be intuitive for people to take it to next level, in terms of what the objective means and how we are supposed to give effect. This is also valid for consent planners as they take	Equitable transition for Māori addressed in IM policy – objective Central Govt will be developing Just transition Māori Strategy.	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				direction from higher order documents. There is Mana Whenua missing from this objective, where any decision regarding what the Objective CC.1 is trying to achieve is co-governed and co-designed with iwi and Māori. Iwi and Māori aspirations and values are not jeopardised and threatened by the said immediate, rapid, and large-scale changes.	Also note changes to Objective CC.6. The content has been split into 2 objectives and formatted for better clarity, responding to feedback that there were a number of concepts contained within the original single objective. The new objective CC.1A splits out the issue of fairness and equity, and now expresses this in the context of RMA well-being language.	
S9.7	Hutt City Council	3.1 Climate Change	Objective CC.1	While the intent of the objective is supported, it is unclear how this is to be implemented. As drafted it reads as a vision statement, rather than a tangible outcome of an RMA process. This objective would be better re-housed in a strategic document, with a more practical objective to implement it at the RPS level. There are a number of concepts included within the one objective which makes it difficult to ascertain exactly what outcome is sought. The issue of an equitable transition is not something that can be resolved through RMA planning processes, and is best achieved outside of this process. Decision requested: The objective needs to be re-drafted to be much more targeted to matters that are achievable within an RMA context.	Redrafted for better focus as a future state 2050 outcome. The content has been split into 2 objectives and formatted for better clarity, responding to feedback that there were a number of concepts contained within the original single objective. The new objective CC.1A splits out the issue of fairness and equity, and now expresses this in the context of RMA well-being language. The objective now refers to matters that are able to be influenced within an RMA context, i.e., management of natural resources, urban and rural land use and infrastructure planning.	
New objective CC.1A						
					Added new objective. The new objective CC.1A splits out the issue of fairness and equity, and now expresses this in the context of RMA well-being language.	Objective CC.1A The costs and benefits of transitioning to a low-emission and climate resilient region are shared fairly to achieve social, cultural and economic well-being across our communities.
Objective CC.2						
S23.12	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	Objective CC.2	The Trust supports Objective CC.2, the Trust are pleased that Regional Council have set a clear percentage reduction in net greenhouse gas emissions by 2030.	Objective CC.2 has been redrafted to: separate the 2050 and 2030 emission reduction targets, aligning these with the greenhouse gas emission reduction targets set out in the Climate Change (Zero Carbon) Amendment Act 2019 clarify that RMA functions can only drive some of the change required to achieve these GHG targets; thus wording '*contribute towards*' incorporate the concept of a fair share reduction in GHG emissions reference all five sources of GHGs in the Region, with sub-clauses that set targets for each of these, aligning with existing national and regional commitments where possible. The critical importance of setting targets for emission reductions in a statutory RMA document has been highlighted by the failure of the recent court case taken against Auckland Transport for failing to give effect to the emissions reductions set out in its Regional Land Transport Plan and promised as part of	Objective CC.2 To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced: (a) By 2030, to contribute to a 50 percent reduction in net greenhouse gas *emissions* from 2019 levels, including a: (i) 35 percent reduction from 2018 levels in land transport-generated greenhouse gas emissions, and (ii) 40 percent increase in active travel and public transport mode share from 2018 levels, and (iii) 60 percent reduction in public transport emissions, from 2018 levels, and (b) By 2050, to achieve net-zero emissions.

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
					Auckland Council's Climate Plan (Te Tāruke-ā-Tāwhiri), due to the lack of "inherent statutory or legal implications" of these documents. Terms such as GHG and carbon used consistently with the terms used in the targets we are referencing	
S16.3	Kāpiti Coast District Council	3.1 Climate Change	Objective CC.2	Oppose: We consider the policy and methods identified to achieve this objective are unlikely to be effective. The development of emissions offsetting guidance, and non-regulatory incentives and advocacy in themselves are unlikely to result in this objective being achieved. 2030 as a minimum (page 6): It is also unclear how district plans would be able to reasonably give effect to this objective when it is required to deliver on other competing interests that are required to be given effect to, such as providing sufficient development capacity for housing and business land over a 30 year period. Decision requested: Oppose: Include reference to the evidence base that demonstrates this objective is achievable using the proposed methods. 2030 as a minimum (page 6): Demonstrate the proposed methods lawfully fall under the jurisdiction of city and district councils under the RMA.	Deleted reference to "as a minimum" and aligned targets with those in the Climate Change Response Act Amended to clarify that RMA functions can only drive some of the change required to achieve GHG targets; thus wording '*contribute towards'*	
S17.4	Masterton District Council	3.1 Climate Change	Objective CC.2	Please see comments on the overarching Issue 1. Under the Policy CC.1 - trying to address this under the WCDP review but difficult to implement to reduce emissions by 50% as a Tier 3 authority (Masterton). Policy CC.2, again is hard to implement as a Tier 3 authority. Policy CC.4 difficult to implement as a Tier 3 authority. Please clarify what is acceptable for a Tier 3 authority. Decision requested: Further clarity sought on how this will impact Tier 3 councils	Actions by both Regional and TAs can only contribute to achieving the targets. All in this together and all playing a part when carrying out RMA functions	
S24.006	Wellington City Council	3.1 Climate Change	Objective CC.2	Inconsistency: "Transport" vs "Transportation" Decision requested: Need to be consistent when using the term "Transport". There are 22 places in this document where "transportation" is being used instead of "transport". Please replace "transportation" by "transport".	Transport used correctly in CC.2	
S24.007	Wellington City Council	3.1 Climate Change	Objective CC.2	Objective CC.2 (Policy 9): Inconsistency: "Greenhouse gas" vs "Carbon dioxide" Decision requested: Need to use the term "Greenhouse gas" instead of "Carbon dioxide" as this more appropriate and has been used in other places (please see Policy 9 in page 63).	Terms used consistently to align to existing national and regional commitments.	
S20.4	South Wairarapa District Council	3.1 Climate Change	Objective CC.2	Support the reduction target in principle, but a s.32 analysis would need to demonstrate alignment with national level goals and assess the costs and benefits of being in advance if this is the case, noting that the objective is a 'minimum'.	Deleted reference to "as a minimum" and aligned targets with those in the Climate Change Response Act	
S25.006	Wellington Water	3.1 Climate Change	Objective CC.2	Could there also be a link to a waste reduction/minimisation policy organic materials. Less waste generally means less emissions, and reducing organics to landfill would also impact on biosolids management decisions particularly if beneficial reuse is picked up on in other provisions. This may link to P65 on efficient use of materials? Decision requested:	Agree. Policy 65 has been amended accordingly. The policy position is to reduce waste which will also reduce greenhouse gas emissions. The areas where the largest reduction of greenhouse gases emissions can be made are in diverting the organic fraction of waste from going to landfill and sludge from	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				Feels like there could also be a link to a waste reduction/minimisation policy, especially if there is one for organic materials. Less waste generally = less emissions, and reducing organics to landfill would also impact on biosolids management decisions (though, as Steve has noted, we'd want to see better enablement of beneficial re-use). Maybe this could also be addressed in Policy 65 on efficient use of materials?	wastewater treatment plant. Policy 65 and Method 17 provides for this reduction to occur.	
S9.8	Hutt City Council	3.1 Climate Change	Objective CC.2	Similar to comments on CC.1 - this objective is not suitable in the RPS and is better placed in a strategic document. RPS provisions can then be made much clearer about what is expected of future land development or other resource use in relation to its contribution to these targets. As drafted it is unclear how this could be implemented through plan-making or resource consent processes. Decision requested: Re-draft to target the objective to the factors that are within the control of RMA planning documents. E.g. Use and development of the Region's natural and physical resources contributes to a reduction in the Region's net greenhouse gas emissions, with a particular focus on reducing emissions from transport, agriculture, and stationary energy.	Objective amended to clarify that RMA functions can only drive some of the change required to achieve these GHG targets; thus wording '*contribute towards'*	
Objective CC.3						
S23.13	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	Objective CC.3	The Trust supports Objective CC.3.	Support Noted	Objective CC.3 Nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment.
S12.006	Ngā Hapū o Ōtaki	3.1 Climate Change	Objective CC.3	Decision requested: Objective CC.3 Nature-based solutions are a core part of climate change adaptation and mitigation, including protecting, restoring, and managing natural and modified ecosystems and creating built infrastructure to improve the health and resilience of people, biodiversity, and the natural environment. Priority is given to solutions that provide multiple benefits for nature and people and is informed by mātauranga Māori	Use of Mātauranga Māori is directed in Integrated Management Policy IM.1, so should not have to be repeated across multiple provisions	
S16.4	Kāpiti Coast District Council	3.1 Climate Change	Objective CC.3	Oppose: Council has a number of issues with the regulatory approach proposed in this package of provisions, even more so given it is proposed to be achieved through district plan changes. Decision requested: Delete these provisions entirely. Alternatively, amend the provisions to non-regulatory methods that are to be carried out by the Regional Council only.	Nature-based solutions are widely accepted as offering significant opportunities to address climate change mitigation and adaptation, while providing benefits for biodiversity and other natural systems The regulatory policies have been refined to be more specific.	
S17.5	Masterton District Council	3.1 Climate Change	Objective CC.3	Agree in principle, but need guidance as to what the nature based solutions to climate change will be. Method CC.4 - please clarify who will be preparing the Regional Forest Spatial Plan. Territorial Authorities should be involved in the preparation of that plan. Decision requested: Masterton District Council to be part of preparing this plan as well as sector and communities.	Method CC.8 directs GW to identify NbS across the region – this will be developed in discussion with TAs and should work collaboratively to secure the opportunities offered by these. Redrafted definition nature-based solutions and Added examples for more clarity	
S20.5	South Wairarapa District Council	3.1 Climate Change	Objective CC.3	Support nature based responses to Climate Change and those responses with multiple benefits and resilient built infrastructure. This has the potential to be more efficient in meeting a wide range of policy imperatives with a single intervention. However, the regional solution to mitigating greenhouse gas emissions should not result in the Wairarapa being the carbon sink for a	Support Noted Provisions supporting increase in forest, give preference to indigenous species	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				disproportionate amount of the region's emissions. Where forest is planted indigenous species should be preferred. Exotic forests afforestation for carbon sequestration should be in appropriate locations only.	Agree re. concerns re. afforestation – Need to read in conjunction with new Objective CC.5 which places emphasis on increasing the area of permanent forest for multiple outcomes	
S25.007	Wellington Water	3.1 Climate Change	Objective CC.3	Decision requested: Is this relevant for green/blue infrastructure, which is often nature-based but are not existing ecosystems to be protected and enhanced.	Simplified for better clarity, letting the definition of Nature-based solutions do the work of explaining the concept. Note revised definition for NbS Yes – definition for NbS includes reference to natural infrastructure which includes blue/green infrastructure	
S14.006	Ngāti Toa	3.1 Climate Change	Objective CC.3	Decision requested: The *nature-based solutions* suggest that there are a handful of proven and trustworthy solutions and proposals in place to responding to Climate Change. However, if looked closer, this objective targets increasing planting practices, as well as the planting extent that aims to achieve multiple outcomes as a core part of climate change adaptation. It is encouraging to see the role of increasing our forest cover and ecosystems, however the current phrasing and content of the Objective and what is actually meant, could lead to misunderstanding of offering less of a kete of larger solutions. The consideration behind preparing forest spatial plans seem to align with the intention of increasing forest cover for climate change adaptation purposes. However, it is unclear whether such exercise is time and resource intensive and could draw us away from the implementation path. Another question regarding spatial forest plans is that how this impacts on land ownership and land use.	Objective is much broader than increasing forest cover – its intent is to protect and restore natural systems and infrastructure to address climate change and at the same time provide benefits to biodiversity and natural ecosystems. Increasing forest extent, preferably indigenous forest, is just one on the approaches being promoted. Regional Spatial Plan aligns with direction of NBA – the aim is to identify areas where increased forest is most appropriate and promote this. There is no intent, nor ability, to require any landowners to plant forest.	
S9.9	Hutt City Council	3.1 Climate Change	Objective CC.3	This objective has several components, and would benefit from re-drafting for clarity. Decision requested: Nature-based solutions that support climate change adaptation and mitigation are incorporated into the use and development of the Region's natural and physical resources, including: (a) the protection, restoration, and management of natural and modified ecosystems (b) creating built infrastructure to improve the health and resilience of people, biodiversity and the natural environment (c) the prioritisation of solutions that provide multiple benefits for nature and people.	Redrafted for simplicity, with the detail of what a Nature based solution is incorporated into the definition.	
Objective CC.4						
S23.14	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	Objective CC.4	The Trust supports Objective CC.4.	Support noted. Redrafted to clarify the outcome sought which is adaptation for people and the natural environment to be better prepared for the predicted impacts of climate change, and to provide a clear point of difference to Natural Hazards Objective 21.	Objective CC.4 Resource management and adaptation planning create resilience for communities and the natural environment to the short, medium, and long-term effects of climate change.
S16.5	Kāpiti Coast District Council	3.1 Climate Change	Objective CC.4	Oppose in part: We consider the method of providing information about areas at risk from natural hazards is insufficient to meet GWRC's obligations under the RMA, particularly with respect to coastal hazards. We consider the RPS needs to provide leadership in the management of inappropriate subdivision, use and development within areas affected by identified coastal hazards by requiring rules in its regional plans to manage these activities. We note such an approach would be consistent with how a number of other regional councils in New Zealand meet their functions under section 30 of the Act such as BOP and Hawkes Bay Regional Councils.	Refer to Natural Hazards provisions Redrafted to clarify the outcome sought which is adaptation for people and the natural environment to be better prepared for the predicted impacts of climate change, and to provide a clear point of difference to Natural Hazards Objective 21.	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				Decision requested: Amend the provisions to more specifically require regional plans to include rules and standards for subdivision, use and development within areas identified as being vulnerable to natural hazards.		
S17.6	Masterton District Council	3.1 Climate Change	Objective CC.4	Agree - the review of the WCDP will reflect this.	Support noted Redrafted to clarify the outcome sought which is adaptation for people and the natural environment to be better prepared for the predicted impacts of climate change, and to provide a clear point of difference to Natural Hazards Objective 21.	
S20.6	South Wairarapa District Council	3.1 Climate Change	Objective CC.4	Support land use planning that provides for climate change and sea level rise over the short, medium and long term. Funding may be required for further assessment of some coastal erosion and inundation, along with updated flooding data for the southern part of the district. SWDC may struggle to fund coastal assessment given the significant amount of coastline but sparce population.	Support noted To degree and detail of research would be commensurate with the potential impacts. Risk assessments of this nature would be designed to do a first pass and identify higher risk or hotspot areas that may require more detailed consideration. Much of this first stage could be completed with existing knowledge between SWDC, GW and local residents.	
S14.007	Ngāti Toa	3.1 Climate Change	Objective CC.4	Decision requested: This objective can be strengthened from 'recognises and provides for', especially considering Policy29, Policy 51, Policy 52, and CC.13 being non-regulatory, specifying how these policies performed and whether the current wording would improve the status quo. Since the first generation regional and district plans, the objectives could not avoid inappropriate subdivision and development in natural hazard overlays, and in some cases, plans could not deliver the objective of reducing the risk and consequences faced from natural hazards. Looking at Policy 52 to deliver this Objective, somewhat contradicts the strength of the Objective CC.4. Given that Policy CC.13 is also non-regulatory, the regulatory impact of CC.4 can be diluted in the consent process. 'recognises and provides for' could be redrafted to say *'Land use planning will respond with appropriate tools and practices...'*	Objective strengthened with emphasis on resource management and adaptation planning, Policies CC.16, CC.17 and methods will provide the tools to achieve this outcome.	
Objective CC.5						
S23.15	Ātiawa ki Whakarongotai Charitable Trust	3.1 Climate Change	Objective CC.5	The Trust supports Objective CC.5.	Retain unchanged	Objective CC.5 People and businesses understand what climate change means for their future and are actively involved in planning and implementing appropriate mitigation and adaptation responses.
S20.7	South Wairarapa District Council	3.1 Climate Change	Objective CC.5	Support education and partnership with the community around climate change and responses to it. Funding will need to be allocated for this.	Retain unchanged	
S25.008	Wellington Water	3.1 Climate Change	Objective CC.5	Decision requested: Should infrastructure providers be included?	Retain unchanged	
S14.008	Ngāti Toa	3.1 Climate Change	Objective CC.5	Decision requested: Objective CC.5 is powerful in the sense that a Regional Policy Statement could impact the behavior strongly- however the Objective is implemented with *Policy CC.19climate change adaptation strategies* which is a non-regulatory instrument. Can this objective be used in land use planning practices?	Retain unchanged	
Objective CC.6						
S23.16	Ātiawa ki Whakarongot	3.1 Climate Change	Objective CC.6	In principle the Trust support in part Objective CC.6. Please refer to comment under Provision No. Table 1A. The Trust also requests the amended wording to reflect that iwi and hapū will need to be supported, through resourcing, to	Redrafted for better clarity as an outcome that LG can help to facilitate.	Objective CC.6 Iwi and hapū are empowered to make decisions to achieve climate-resilience in their communities.

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
	ai Charitable Trust			achieve this Objective. The way the Objective is currently worded may place onerous expectations on unresourced iwi and hapū to acheive the Objective. Decision requested: Iwi and hapū are supported to help build climate- resilience in their communities and play a strategic role in developing a low-emissions pathway		
S18.2	Waka Kotahi	3.1 Climate Change	Objective CC.6	Change help to empowered to show iwi and hapū taking an active role here. Decision requested: Iwi and hapū help are empowered to build climate-resilience in their communities and play a strategic role in developing a low-emissions pathway	Redrafted for better clarity as an outcome that LG can help to facilitate.	
S20.8	South Wairarapa District Council	3.1 Climate Change	Objective CC.6	Support the requirement for the active role of treaty partners in developing responses to climate change. We note that this is not the only matter which 'we' are calling on our partners to contribute to and that care must be considered in understanding capability and capacity in this space along with other competing demands.	Redrafted for better clarity as an outcome that LG can help to facilitate.	
S14.009	Ngāti Toa	3.1 Climate Change	Objective CC.6	Decision requested: This objective does not recognise the lack of resources, funding, and capability of iwi and hapū to help build climate resilience. The wording is suggesting an objective that iwi and hāpu would do anyway without the RPS dictating it. This brings in the question of who is the audience of the Objective. Objective CC.6 can be reworded to express the objective of 'increasing the resilience of iwi and hāpu' if that is what was intended and clarify the audience of the Objective.	Redrafted for better clarity as an outcome that LG can help to facilitate.	
Policy CC.13						
S23.96	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy CC.13:	The Trust supports Policy CC.13 as it clearly sets out a hierarchy to be applied when assessing a proposed activity against the policy.	Noted	<u>Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting – district and regional</u> <u>District and regional plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply.</u> <u>Explanation</u> <u>This policy recognises the importance of reducing gross greenhouse gas *emissions* as the first priority, and only using carbon removals to offset *emissions* from hard-to-abate sectors. Relying heavily on offsetting will delay people taking actions that reduce gross *emissions*, lead to higher cumulative *emissions* and push the burden of addressing gross *emissions* onto future generations.</u>
S16.45	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy CC.13:	Oppose: There is no statutory basis under the RMA or higher-level statutory planning documents to require particular regard be given to most of the matters raised by these draft policies when considering an application for resource consent, a notice of requirement, or a change to a district plan. Given the lack of a statutory basis for these matters, it is unclear how district plans could reasonably give particular regard to any of them in its decision making under the RMA. The only draft provision that city and district councils could reasonably have particular regard to when considering a resource consent or notice of requirements would be activities that fall under section 108(2)(c) of the Act as follows: (1) Except as expressly provided in this section and subject to section 108AA and any regulations, a resource consent may be granted on any condition that the consent authority considers appropriate, including any condition of a kind referred to in subsection (2). (2) A resource consent may include any 1 or more of the following conditions: (c) a condition requiring that services or works, including (but without limitation) the protection, planting, or replanting of any tree or other vegetation or the protection, restoration, or enhancement of any natural or physical resource, be provided: Decision requested:		

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				Delete Policy CC.13, or apply it only to regional consents and changes to a regional plan. Alternatively, consider non- regulatory methods to encourage these activities.		
S19.46	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy CC.13:	At what scale? Who has the expertise to assess these and apply offsets?	Amended provision to clarify	
S20.68	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy CC.13:	As discussed above, reductions should be prioritised over offsets, and the effects of any offsets should consider effects on the communities where they are located.	Noted. The policy redrafted as directive policy. This will allow district councils to set objectives, policies, rules, methods that conder effects on their district and local communities.	
Method CC.2						
S23.115	Ātiawa ki Whakarongotai Charitable Trust	4.5.2 Non-regulatory methods - information and guidance	Method CC.2:	The Trust seeks clarity on the changes Regional Council are proposing in Method CC.2.	This method directs GWRC to develop and support educational and behavioural change programmes to support communities transition to low and zero carbon future.	<u>Method CC.1: Climate change education and behaviour change programme</u> <u>Support and enable climate change and behavioural change programmes, that include Te Ao Māori and Mātauranga Māori perspectives, to support a fair transition to low-emission and climate resilient region.</u> <u>*Implementation: Wellington Regional Council*</u>
S10.025	Wairarapa Iwi	4.5.2 Non-regulatory methods - information and guidance	Method CC.2:	Decision requested: Bring in nature-based solutions.	Not sure this comment belongs to this method	
S12.008	Ngā Hapū o Ōtaki	4.5.2 Non-regulatory methods - information and guidance	Method CC.2:	Decision requested: Method CC.2: Climate change education, and behaviour change programme that includes Te Ao Māori and Mātauranga Māori	Suggested wording added.	
S20.80	South Wairarapa District Council	4.5.2 Non-regulatory methods - information and guidance	Method CC.2:	Support GWRC developing and providing good practice material for rural land users to promote climate change resilience. As above, the exercise should be collaborative and include the parties identified above and also relevant sector group representatives.	Not sure this comment is for this method	
Appendix 3: Definitions						
S12.056	Ngā Hapū o Ōtaki	Appendix 3: Definitions	Climate change adaptation	Decision requested: Actions that can help people or natural systems adjust to the actual or expected impacts of climate change.Urgent a~~A~~ctions can be incremental ~~and~~temporary in their effect and/or transformational by changing systems and their functions, depending on the scale and pace of change and what is at stake.	Definition amended	<u>In human systems, the process of adjusting to actual or expected climate and its effects, in order to moderate harm or take advantage of beneficial opportunities. In natural systems, the process of adjusting to actual climate and its effects. Human intervention may help these systems to adjust to expected climate and its effects.</u>

Climate change – agricultural emissions

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
Policy CC.5						

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S10.022	Wairarapa Iwi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.5:	Decision requested: Disappointed by lack of strength of these provisions (this and other agricultural provisions) - challenge to strengthen the requirements to reduce agricultural emissions (refers to a pre-draft version)	Increased strength by adding a minimum expectation to avoid increased emissions of biogenic methane Noting Central Govt leading this work space	Policy CC.5: Avoid increases in agricultural gross biogenic methane emissions – regional plan Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in gross greenhouse gas emissions from agriculture. Policy CC.15: Improve rural resilience to climate change – Non-regulatory Support rural communities in their climate change adaptation and mitigation efforts, including by: (a) providing practical and easily accessible information on climate change projections at a local level, (b) promoting and supporting resilient land management practices and/or land uses, including nature-based solutions, (c) promoting land management practices and/or land uses that will reduce gross biogenic methane emissions, (d) giving preference to climate change efforts that also deliver benefits for indigenous biodiversity, land, fresh and coastal water. Explanation This policy promotes and supports low emission agriculture and increased rural resilience to climate change.
S23.68	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.5:	The Trust in principle supports Policy CC.5.	Support noted	
S19.27	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.5:	Support - agriculture is a big source of GHG. Unclear what "regional policy approach" is in reference to.	Support noted	
S20.44	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.5:	The s.32 needs to adequately identify how the provision of equity will be applied when identifying the quantum of reduction required, along with the potential costs to rural economies and communities. Similarly, we wish to understand how this reduction aligns with Government policy in the area. How would fair and reasonable reductions be calculates and consistently applied in consenting practice? While not included in the methods, this policy appears to set the initial framework for a Regional Plan targeted at agricultural emissions. This continues the growth of regulatory burdens on the primary sector and assumes land use change, most likely to forestry based on current observations. Support the transition to land use practices that are more resilient to climate change, support co-benefits (climate/water quality probably forestry). GWRC needs to actively support/engage with the productive rural community to facilitate land use practice changes.	RPS sets a a minimum expectation that biogenic methane emissions should not increase. It supports reductions through a range of non-regulatory measures working with and supporting farmers, government and industry programmes Split Policy CC5 into 2 parts to recognize limited regulatory intent and focus on supporting reductions Split Policy CC.5 into two parts to separate the minimum expectation from the non-regulatory package. New policy CC.15 and Method CC.8 directs GW to set up a programme to support low emission and climate resilient agriculture through non-reg measures	
Policy CC.15						
S16.47	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy CC.15:	Oppose: There is no statutory basis under the RMA or higher-level statutory planning documents to require particular regard be given to most of the matters raised by these draft policies when considering an application for resource consent, a notice of requirement, or a change to a district plan. Given the lack of a statutory basis for these matters, it is unclear how district plans could reasonably give particular regard to any of them in its decision making under the RMA. The only draft provision that city and district councils could reasonably have particular regard to when considering a resource consent or notice of requirements would be activities that fall under section 108(2)(c) of the Act as follows: (1) Except as expressly provided in this section and subject to section 108AA and any regulations, a resource consent may be granted on any	Legal advice is that both district and regional councils must have regard to the National Emissions Reduction Plan However, consider that regional councils are better placed to consider greenhouse gas emissions given functions for discharges to air and connection to managing the effects of land use on water quality. Have removed district plans from Policy	New Policy CC.13: Managing agricultural gross greenhouse gas emissions – consideration When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to: (a) reducing gross greenhouse gas emissions as a priority where practicable, and (b) where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and (c) avoiding any increase in gross greenhouse gas emissions.

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				condition that the consent authority considers appropriate, including any condition of a kind referred to in subsection (2). (2) A resource consent may include any 1 or more of the following conditions: (c) a condition requiring that services or works, including (but without limitation) the protection, planting, or replanting of any tree or other vegetation or the protection, restoration, or enhancement of any natural or physical resource, be provided:		Explanation: As agriculture is the second largest emitter of GHG in the region, contributing 34 percent of the region's GHG *emissions*, reducing *emissions* from this sector is critical to contribute to achieving Objective CC.2. As of 30 November 2022, consent authorities may have regard to the effects of discharges into air of *greenhouse gases* on climate change in considering an application for a discharge permit or coastal permit. Where resource consent is required in association with a change in land use intensity or type of agricultural land use, the policy requires a hierarchy of effort, seeking to reduce gross greenhouse gas *emissions* in the first instance, followed by achieving a net reduction, with a minimum expectation that any increase in gross *emissions* is avoided.
S23.98	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy CC.15:	The Trust supports in part Policy CC.15. The Trust seek that the words 'preferably a reduction' are deleted. When considering 34% of greenhouse gas emissions in the region are attributed to the agricultural industry it seems that the industry should be doing more to actually reduce emissions rather than 'maintain' current levels of emissions. There is an over-reliance on reduction through other industries, particularly the transport industry to address climate change and reduce emissions. Decision requested: Policy CC.15: Reducing agricultural gross biogenic methane emissions - consideration When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to ensuring that there is no increase, and ~~preferably~~ a reduction, in gross biogenic methane emissions from agriculture.	Central Government is leading the policy space on measures to reduce biogenic methane. The RPS sets a minimum expectation of avoiding increased methane emissions, direction to promote and support reductions and New Method CC5. to review the regional approach when the RPS is subject to full review in 2024.	
S17.57	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy CC.15:	Is the intent of this policy to limit dairy farming intensification? If so, how are these communities going to be supported?	The intent is to avoid further increases and work towards decreases in methane emissions. The way in which this will be achieved is still evolving, but it is our understanding that the initial 10% reduction can be achieved by the adoption of best practice agriculture rather than land use change.	
S19.48	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy CC.15:	This is a regional council function - how is a TA supposed to be able to determine this? This becomes a duplication of functions and regulation between RC and TAs	Have removed district plans from Policy	
S20.70	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy CC.15:	It is unclear as to the roles TA's can play or are intended to in decision making over biogenic emissions of methane. This requires clarification from GWRC. This policy appears to be a forerunner to changes to the regional plan to manage agricultural discharges. GWRC need to be clear about the proportion of reduction required in this area and how it would or could be calculated and applied equitably across decisions.	Have removed district plans from Policy	
S14.060	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy CC.15:	Decision requested: Does this policy cover methane emissions from landfills?	No – that is addressed by the waste policies	
Method CC.3						
S10.026	Wairarapa Iwi	4.5.3 Non-regulatory methods - integrating management	Method CC.3:	Decision requested: · Add date for this spatial plan; in place by2023. Need to provide incentives. Also need to monitor plan effectiveness andefficiency for implementation.	Added date, By June 2024	Method CC.8: Programme to support low- emissions and climate-resilient agriculture-non-regulatory methods By June 2024, develop a targeted climate change extension programme to actively promote and support changes to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change, including by: (a) providing practical and easily accessible information on projected climate change impacts at a local level,
S20.85	South Wairarapa District Council	4.5.3 Non-regulatory methods - integrating management	Method CC.3:	More detail about how this works in the longer term is required.	Happy to discuss	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
						(b) providing base data held by the regional council to support the development of farm greenhouse gas emission profiles, (c) promoting and supporting actions to reduce agricultural gross greenhouse gas emissions and/or increase climate resilience, (d) identifying appropriate areas and species for tree planting/natural regeneration in farm plans as part of implementing the regional spatial forest plan (see Method CC.4), (e) identifying other on-farm *nature-based solutions* that will increase the resilience of a farm system and/or catchment to the effects of climate change, (f) supporting central government and industry climate change programmes/initiatives. *Implementation: Wellington Regional Council*
Method CC.5						
S20.87	South Wairarapa District Council	4.5.3 Non-regulatory methods - integrating management	Method CC.5:	Response does not appear to have received much thought. We suggest a regional collaborative forum, much like those used for ground up freshwater approaches, be established to assist governors in direction setting. Why the single focus on agricultural approaches only is unclear.	A review is proposed as the policy space is very unclear at the moment: • Central Government is to make a decision as to how reductions in agricultural emissions will be achieved by the end of 2022. • MFE is to provide guidance on regional and TA responsibilities to address GHG emissions under the RMA before Nov 2022 • The RPS policy approach sets a minimum expectation and it is appropriate to review this once the government direction and results of initial GW action are clearer.	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions Monitor changes in agricultural land use and land management practices and review the regional policy approach by 31 December 2024, responding to any predicted changes in greenhouse gas emissions from the agricultural section in the Wellington Region and any new national policy direction. *Implementation: Wellington Regional Council*
S14.066	Ngāti Toa	4.5.3 Non-regulatory methods - integrating management	Method CC.5:	Decision requested: Under the central government direction, how can Regional Councils achieve emission reductions from agriculture? Is this method, just limited to reviewing the regional response, which means reviewing land use emissions impact? It is not clear.	A review is proposed as the policy space is very unclear at the moment: • Central Government is to make a decision as to how reductions in agricultural emissions will be achieved by the end of 2022. • MFE is to provide guidance on regional and TA responsibilities to address GHG emissions under the RMA before Nov 2022 • The RPS policy approach sets a minimum expectation and it is appropriate to review this once the government direction and results of initial GW action are clearer.	

Climate change – energy, waste, industrial processes

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
General						
S14.011	Ngāti Toa	3.3 Energy infrastructure and waste	3.3	Decision requested: Objective 11 The quantity of waste disposed of is reduced Objective 11 could be worded to express a stronger behavioral direction to say: *the quantity of waste disposed of is reduced to ultimately remove our reliance on*	Agree. The total quantity of waste needs to reduce to prevent further landfills from development. The policy framework of the RPS has not changed on this point, refer to Objective 11, Policy 65.	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
				landfills. Policy65 is non-regulatory for the extent of the Objective. To be able to remove our reliance on landfills, a policy that is regulatory will be required.		
S16.6	Kāpiti Coast District Council	3.3 Energy infrastructure and waste	3.3	We support these minor amendments. Decision requested: Retain amendments.	Noted. Amendments have been made to all policies however the intent remains the same.	
S23.17	Ātiawa ki Whakarongotai Charitable Trust	3.3 Energy infrastructure and waste	3.3	The Trust supports the minor amendments made to Table 3. The Trust seek further amendment of the introductory text to chapter 3.3. It is not clear how the current wording captures issues of significance to the Trust, particularly in regards to waste. Decision requested: 3. Waste We cannot continue to generate the current waste volumes because of the costs of disposal, environmental impacts of landfills, limited space in existing landfills and because it is inefficient to dispose of potentially valuable resources. Developing new landfills also poses significant challenges economically, environmentally, culturally and socially	Noted. We agree, the policy position of the RPS is to reduce waste and further reduce – 'Residual waste', which is the waste that is landfilled. The RPS has been amended to ensure the policy position follows this path, of the 5 R's, overall to reduce the quantity of waste produced in the region.	
S11.003	Kāinga Ora	3.3 Energy infrastructure and waste	3.3	Decision requested: 1. The Draft Change 1 has identified that *"the operation or use of infrastructure can create noise which may adversely impact surrounding communities. These effects need to be balanced to determine what is appropriate for the individual circumstances.[1]* Kāinga Ora acknowledges this issue and notes that the Regional Policy Statement (RPS) through Draft Change 1, promotes intensification and development within the urban environment, but does not include objectives and policies to protect development from adverse effects within the urban environment from infrastructure. Kāinga Ora seeks that objectives and policies are included within the RPS to recognise that infrastructure must also mitigate their effect on existing and planned communities. [1] Section 3.3(b) of the Draft Change 1	The regionally significant infrastructure policies (Policy 7, 8, 11, and 39) are largely unchanged in the RPS. Policy 8 protects infrastructure from other use and development including new urban development. The policy position is unchanged.	
S25.009	Wellington Water	3.3 Energy infrastructure and waste	3.3	Decision requested: The RPS doesn't address the impacts of climate change on water security - longer droughts in summer and sea level rise/sailne intrusion for the aquifer. While this RPS change is not focussed on infrastructure, it is focussed on climate change and this is a significant gap.	Noted. Refer to freshwater and climate change policies.	
S14.010	Ngāti Toa	3.3 Energy infrastructure and waste	3.3	Decision requested: It is surprising to see the text used in 2013 when the RPS became operative has not changed, since New Zealand in particular, and world in general are going through some major events, that will fundamentally impact our energy use, food demand, and transport. Particularly, the third paragraph that refers to energy demand from all sectors continuing to grow, and with the most significant growth coming from transport. Seeing a raft of Objectives on Climate Change being introduced in this RPS, Section 3.3 is not well connected to these objectives. Global oil demand is changing with the invasion of Ukraine and we are living in a world where food scarcity is a real prospect. Our choice of energy will be impacted by these developments. The introductory text does not refer to this new contextual environment and reads as if we still need to grow our requirements of energy and therefore, associated emissions. Paragraph six that refers to our international obligations on reducing our emissions; reads as the core reason of reducing our emissions in New Zealand. We are not necessarily reducing our emissions because of our international obligations. Paragraph eight refers to2007 and 2008 Government's Energy strategies and is	Noted. New definitions for organic waste have been included. The draft changes are focused on biogenic methane from the waste streams. We note that waste is an issue for the region overall and New Zealand. The principles in the RPS chapter to reduce waste has not changed. This is a total reduction in the waste from the household and commercial sectors. New Policy 65 and Method 17 are positioned to begin new waste management policy initiatives, taking onboard the issue of organic waste which creates greenhouse gases once landfilled.	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
				not reflecting the latest policies and documents that are associated with this section. The latest New Zealand Energy Strategy is 2011-2021 and there are plans for a new one to be released in 2024. Section (b) and Section (c)that refers to infrastructure and waste, do not connect the dots about how infrastructure and waste has been dealt with through the RPS. The issue analysis, for instance, in these sections do not link the issues Tangata Whenua face regarding these subject-matters. For instance, the analysis of waste issues do not refer how connected this issue to infrastructure and three waters network management. These issues pop in consent applications and processes which are the inappropriate processes for them to be addressed. (2) Regarding the infrastructure section, it seems the discussion focus is the barriers that infrastructure faces rather than its broader context. (3) Regarding the waste section, a most up to date issue definition is needed, as the system is still requiring landfill consent applications for addressing waste management, although the RPS is aspiring to lessen the need for new landfills.		
Table 3						
S24.008	Wellington City Council	3.3 Energy infrastructure and waste	Table 3:	Decision requested: Policy 7 should be more than 'recognising'... but enabling. i.e. by consenting etc...	Noted. Policy 7 recognises RSI and REG, this is the policy position for RPS.	
S24.009	Wellington City Council	3.3 Energy infrastructure and waste	Table 3:	Introductory text: In the body text, should add 'green hydrogen' as one of the possible renewable energy generation sources for the region. 'Green' hydrogen could be produced by a method called electrolysis using water as a feedstock. While it consumes electricity to produce hydrogen, the potential of increasing renewable energy in the region (such as marine energy development) could facilitate the hydrogen production. Due to the electricity supply constraints in Wellington region, we need to approach the issues with multiple solutions (including solar). Note that there are now hydrogen- hot water systems available overseas. Therefore, it is only a matter of time, provided that infrastructure is built to support the hydrogen supply chain, that Aotearoa can reduce its reliance on natural gas hot water and/or electric hot water systems Decision requested: Introductory text: Inclusion of other alternatives... even if it is not readily available yet	Noted. The RPS policies do not preclude green energy in the form of green hydrogen from progressing. We understand that these new forms of technology will substitute existing forms of energy in the medium to long term in New Zealand.	
Objective 9						
S23.18	Ātiawa ki Whakarongotai Charitable Trust	3.3 Energy infrastructure and waste	Objective 9	The Trust supports the minor amendment made to Objective 9 to require that greenhouse gas emissions from waste are included in this Objective.	Noted. Objective 9 has not been amended. The new climate change objectives and the existing Objective 11 (waste reduction) sufficiently provide the outcomes required to reduce greenhouse gas emissions from the waste sector.	Objective 9 The region's energy needs are met in ways that: improve energy efficiency and conservation; (a) diversify the type and scale of renewable energy development; (b) maximise the use of renewable energy resources; (c) reduce dependency on fossil fuels; and (d) reduce greenhouse gas emissions from transportation
Policy 2						
S23.39	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land	Policy 2:	The Trust support the amendments to Policy 2.	Accepted.	Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, <u>and reducing greenhouse gas emissions</u> – regional plans Regional plans shall include policies<u>,</u> ~~and/or~~ rules <u>and/or methods</u> that: (a) protect or enhance the amenity values of neighbouring areas from discharges of odour, smoke and dust; and

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		Transport Plan				(b) protect people's health from discharges of dust, smoke and fine particulate matter; and (c) support industry to reduce greenhouse gas emissions from industrial processes, and (d) phase-out coal as a fuel source for domestic fires and large-scale generators by 2030. Explanation Policy 2 seeks to reduce the adverse effects of the discharge of contaminants into the air, which affect people's health and wellbeing. In addition, it seeks to support industry to reduce discharges of greenhouse gas emissions from industrial processes, and to phase out coal as a fuel source for domestic fires and large-scale industrial boilers by 2030.
S17.15	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 2:	What do these amendments mean for new or existing expansion? Noting that there is limited powers for officers to address complaints about air quality. Council officers have no powers of entry to confirm allegations. Need further clarity on roles and responsibilities.	Accepted. Policy 2 has been amended accordingly.	
S24.014	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 2:	the phrase "avoid new discharges of greenhouse gas emissions from industrial and trade premises" would also capture emissions from carbon-neutral fuels, such as wood pellets, and would capture new discharges which may be lower overall than previously. Decision requested: Needs to be reworded to something like "avoid net increases in greenhouse gas emissions from burning of non-renewable resources from industrial and trade premises"	Accepted. Policy 2 has been reworded.	
S14.016	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 2:	Decision requested: The new addition to the policy where existing industrial and trade premise consent holders to demonstrate a reduction in GHGs at consent renewal is encouraging as well as the phasing out the coal. However, we are unsure of the policy impact on our communities especially given that the transition required is not too far (2024). Having access to a warm and dry house in most instances could mean domestic fires. It will be costly to change this overnight. Another question this Policy also poses is how monitoring and compliance will be performed.	Accepted. Policy 2 is reworded to consider the impact on businesses and communities.	
Policy 7						
S23.41	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 7:	The Trust supports the amendments to Policy 7, particularly the intent to transition to low or zero carbon energy and infrastructure.	Accepted.	Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans District and regional plans shall include policies and/or methods that recognise: (a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, and in particular low and zero carbon regionally significant infrastructure including: (i) people and goods can travel to, from and around the region efficiently and safely and in ways that support transitioning to low or zero carbon multi modal travel modes; (ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;
S20.22	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional	Policy 7:	Support enabling infrastructure that low and zero carbon. We do have concerns about affordability for small councils with multiple WWTP's. Capital and maintenance cost increased will be significant.	Accepted.	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		Land Transport Plan				(iii) people have access to energy, and preferably low or zero carbon 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 energy resources; and (iii) reducing greenhouse gas emissions. Explanation Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits both within and outside the region, in particular if regionally significant infrastructure is a low or zero carbon development.
S17.17	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 7:	Is this an Entity C issue? Note that this is a significant affordability issue for our community. Decision requested: Further clarity sought on how this will impact Tier 3 councils	This point on the implications of cost of new infrastructure is noted.	
S19.9	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 7:	What is "low and zero carbon regionally significant infrastructure"? Needs to be defined.	Noted. Low or zero carbon is not defined at this stage. Low carbon is a reduction in carbon from current levels in infrastructure.	
S24.015	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 7:	There are no or limited provisions to support the production and use of bio-fuels and hydrogen fuels. Decision requested: Policy 7, Policy 9 and Policy 39 need to have provisions for an increased uptake of green fuels (biofuels and hydrogen fuels). This is because these fuels are keys for reducing emissions from the freight, aviation, and maritime transport sector. National Emissions Reduction Plan (ERP) has also highlighted the importance of these green fuels as other low and zero carbon alternatives for these sectors are not mature enough to deploy in large scale to reduce emissions. Please see "Action 10.3.1"; "Action 10.3.3"; and "Action 10.3.4" in the national Emissions Reduction Plan here: https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf.	Noted. The draft RPS generically refers to substitute fuels in the transport climate change policies.	
S25.017	Wellington Water	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 7:	"This creates three tiers of infrastructure, infrastructure, regionally significant infrastructure and then low and zero carbon regionally significant infrastructure. Two tiers is complicated enough and having three tiers waters down the existing considerations and exemptions for regionally significant infrastructure. What is low carbon regionally significant infrastructure? (a)(ii)(2) needs to be supported by enabling policies for beneficial end-use of diverted biosolids. There is also an option to include efficient use of water here (less water used = less pumping energy and chemicals)" Decision requested: Remove change to clause 7(a) and insert new Policy 7A: Low and zero carbon regionally significant infrastructure shall be generally considered as appropriate	Noted. We consider that 'generally consider as appropriate' would reduce the effectiveness of the policy sub-clause. The climate change objectives it is initiate change before 2030 and then 2050, having a directive approach is more appropriate.	
S9.15	Hutt City Council	4.1 Regulatory policies -	Policy 7:	This policy is directing district and regional plans to do a number of different things (recognise benefits of regionally significant infrastructure, supporting low/zero carbon and multi modal travel modes, maintaining the provision of	Noted. Policy 7 is an operative policy in the RPS that underpins the policy framework for infrastructure in the region. The policy has been amended for the	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		direction to district and regional plans and the Regional Land Transport Plan		essential services, addressing climate change emissions from wastewater treatment plants). It would be clearer to give this direction through multiple policies. Decision requested: Split the policy so that all direction from the policy is communicated clearly.	climate change position the intent of the policy is not changed.	
S24.036	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 7:	Decision requested: Policy 7, Policy 9 and Policy 39 need to have provisions for an increased uptake of green fuels (biofuels and hydrogen fuels). This is because these fuels are keys for reducing emissions from the freight, aviation, and maritime transport sector. National Emissions Reduction Plan (ERP) has also highlighted the importance of these green fuels as other low and zero carbon alternatives for these sectors are not mature enough to deploy in large scale to reduce emissions. Please see "Action 10.3.1"; "Action 10.3.3"; and "Action 10.3.4" in the national Emissions Reduction Plan here: https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf.	Noted. Fuels and fuel types are in the transport suite of policies. Fuels are generically described as low carbon or zero carbon.	
S14.017	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 7:	Decision requested: The changes and amendments made in Policy 7 (a)and (a) (i) supporting a low or zero carbon system, Policy (i) (1), (2), and(3) are contributing to the status quo and might be doing more of the same. For instance, reducing fugitive GHGs from wastewater treatment plants and increasing the diversion of wastewater sludge, requiring efficient municipal landfill gas systems. The RPS policy intention could encourage practitioners to transition to new and innovative systems- not doing more of the same. Allowing a more efficient landfill could be seen as improvement, but the policy could re-shift focus on having no landfills.	Accepted. The amendments to Policy 7 and Policy 65 are to be read together. The policy position is to reduce waste and divert organic waste from landfill (residual waste). Policy 65 is to support and encourage new technologies and methods to divert organic waste and waste overall.	
Policy 11						
S23.45	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 11:	The Trust support the amendments to Policy 10.	Accepted.	Policy 11: Promoting <u>and enabling</u> 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~~ <u>energy efficient alterations to existing buildings;</u> (b) <u>enable the installation and</u> use of domestic scale (up to 20 kW) and small scale distributed renewable energy generation (up to 100 kW)~~; and provide for energy efficient alterations to existing buildings;~~ Explanation <u>Policy 11 promotes energy efficient design, energy efficient alterations to existing buildings, and enables installation of domestic scale and renewable energy generation (up to 100kW).</u> <u>Energy efficient design and alteration to existing buildings, can reduce total energy costs (i.e., heating) and reliance on non-renewable energy supply.</u> <u>Small scale distributed renewable electricity generation means renewable electricity generation for the purpose</u>
S20.25	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 11:	Support the promoting small scale and community scale distributed electricity generation. This will be included in the draft Combined Wairarapa District Plan.	Accepted.	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
S16.16	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 11:	Oppose in part: The change to this policy is to require district plans to promote and enable energy efficient design and small scale energy generation. If district plans are required to enable small scale energy generation, we consider a definition for what the RPS considers small scale energy generation to include must be provided so city and district councils can consider what the potential implications and effects of these activities may be. It is also unclear what the rationale is for deleting clauses (c) and (d) of this policy. Decision requested: The draft RPS Change 1 includes a definition for small scale energy generation to enable councils to consider the implications of enabling such activities through the district plan.	Definition included from the NPS-REG (2011) in the explanation.	<u>of using electricity on a particular site, or supplying an immediate community, or connecting into the distribution network. (from NPS-REG 2011).</u>
S17.21	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 11:	Agree - the review of the WCDP will reflect this	Accepted.	
S24.019	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 11:	Decision requested: What is the reason for capping the scale of the renewable energy generation?	Policy 11 is an operative policy. The policy is set at small scale to enable more of a shift to renewable energy generation across the entire region rather than promotion of one or two large energy developments. The larger projects required substantial investment and development costs. The further from the national grid these projects are initiated the lesser the overall benefit to the region.	
S14.021	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 11:	Decision requested: *Policy 11* can be more directive in allowing District Plans to use more directive words for energy efficient designs for all new development.	Noted. Policy 11 is connected with the Building Act and the requirements for energy efficient design. The district plan promotes these design elements and cannot require them through the RMA.	
Policy 39						
S23.72	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 39:	The Trust supports the amendments made to Policy 39.	Accepted.	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to:
S14.042	Ngāti Toa	4.2 Regulatory policies -	Policy 39:	Decision requested: Most regionally significant infrastructure is located where iwi and Tangata Whenua has sites of significance or cultural redress in their Treaty Settlement	Noted. Presently, we consider than there are sufficient provisions in the RPS and in regional and district plans to protect site of significance as part any Treat	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		matters to be considered		Claims Act. This consideration of Policy 39 should not clash implementing iwi's rights of Tino Rangatiratanga and should not be interpreted in a way that the need for infrastructure does not recognise the rights and interests associated with the proposals. If there is such prospect of this happening, going forward should be co-designed with Tangata Whenua and iwi. This link between the sites and areas of significance and regionally significant infrastructure is crucial.	Settlement Claim. The amendments to Policy 39 have not changed the outcome of the policy.	(a) the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and/or regionally significant infrastructure, in particular where it contributes to reducing greenhouse gas emissions; and (b) protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure; and (c) the need for renewable electricity generation facilities to locate where the renewable energy resources exist; and (d) significant wind, solar and marine renewable energy resources within the region. Explanation Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 39 recognises that these activities can provide benefits both within and outside the region, particularly to contribute to reducing greenhouse gas emissions.
S20.48	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy 39:	support relatively minor amendments that recognise benefits of renewable energy as they relate to the reduction of greenhouse emissions. Also support the inclusion of solar energy in renewable energy generation.	Accepted.	
S24.026	Wellington City Council	4.2 Regulatory policies - matters to be considered	Policy 39:	There are no or limited provisions to support the production and use of bio-fuels and hydrogen fuels. Decision requested: Policy 7, Policy 9 and Policy 39 need to have provisions for an increased uptake of green fuels (biofuels and hydrogen fuels). This is because these fuels are keys for reducing emissions from the freight, aviation, and maritime transport sector. National Emissions Reduction Plan (ERP) has also highlighted the importance of these green fuels as other low and zero carbon alternatives for these sectors are not mature enough to deploy in large scale to reduce emissions. Please see "Action 10.3.1"; "Action 10.3.3"; and "Action 10.3.4" in the national Emissions Reduction Plan here: https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf.	Noted. Policy 39 is a consideration policy with the regulatory policy in Policy 11.	
Policy 65						
S23.104	Ātiawa ki Whakarongotai Charitable Trust	4.4 Non-regulatory policies	Policy 65:	In principle the Trust supports the intent of Policy 65. The Trust would like to see more emphasis on reducing waste first. The Trust suggests Regional Council look at alternative wording to prioritise waste reduction/minimisation.	Agree. The policy is reworked to support and encourage the 5 R's and reduce organic waste at source.	Policy 65: Supporting and encouraging ~~Promoting~~ efficient use and conservation of resources – non-regulatory To ~~promote~~ support and encourage conservation and efficient use of resources by: (a) applying the 5 R's (Reduce~~ing~~, Reuse~~ing~~, Recycle~~ing~~, Recover, ~~recycling~~ and Residual waste management); (b) reducing organic waste at source from households and commercial premises; (c) increasing the diversion of wastewater sludge from wastewater treatment plants before deposition to municipal landfills; (d) requiring efficient municipal landfill gas systems; (e) using water and energy efficiently; and (f) conserving water and energy. Explanation Policy 65 promotes the efficient use of resources to reduce emissions. The policy endorses the waste hierarchy and also promotes similar principles for efficient water and energy use.
S25.029	Wellington Water	4.4 Non-regulatory policies	Policy 65:	Decision requested: Given the new policies P17A-C perhaps this would be better directed at existing development?	Noted. Policy 65 is directed at existing and new businesses in waste management.	
Method 17						
S23.116	Ātiawa ki Whakarongotai Charitable Trust	4.5.2 Non-regulatory methods - information and guidance	Method 17:	The Trust seeks that Regional Council partner with mana whenua to develop information that promote and assist action on waste management.	Method 17 includes partnership with mana whenua and city and district councils, industry groups, and the community to work on reducing waste at source and reducing the need for landfills in the long term.	Method 17: Reducing waste and greenhouse gases emissions from waste streams ~~Information about waste management~~

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
S20.81	South Wairarapa District Council	4.5.2 Non-regulatory methods - information and guidance	Method 17:	Generally support. The need for (d) is not understood/clear.	Method 17 (d) has been removed in the new version of the draft. Woody biomass is a wood substitute that is carbon neutral. There is work in NZ on developing woody biomass sources, but for this plan change the focus is one reducing greenhouse gas	Work in partnership with mana whenua / tangata whenua and with city and district councils, the waste management sector, industry groups and the community to: (a) reduce organic matter at source, and (b) work towards implementing kerbside recovery of organic waste from households and commercial premises, and (c) encourage development opportunities for increasing the recovery of biogas from municipal landfills, and (d) increase the diversion of organic waste (sludge) from the waste stream before deposition to municipal landfills. *Implementation: Wellington Regional Council, iwi authorities, city and district councils.*
S25.030	Wellington Water	4.5.2 Non-regulatory methods - information and guidance	Method 17:	Decision requested: This could include beneficial end-use of bio-solids (or a more general promote the alternative processing and use of organic wastes)	Noted. There will need to be alternative options for sludge deposition as part of the development of Method 17. We consider Method 17 is sufficiently broad in scope to provide for alternative uses of sludge.	
S14.063	Ngāti Toa	4.5.2 Non-regulatory methods - information and guidance	Method 17:	Decision requested: It is not clear what has changed from the previous method in terms of outcomes. The wording seems that it could be strengthened. The intention of the method is not clear in the drafting; promoting and assisting actions on waste management does not seem to be targeted at what activity they are aiming for - and it is a generic statement that may not find its audience. Could this phrase be changed to say, 'ensure waste management's impact on the environment are removed gradually within the limitations of our current waste management systems'. The methods outlined are targeted at supporting District and City councils? Ideal to clarify what authority this will apply.	Method 17 implements Policy 65. The language of Method 17 is to indicate the various methods or pathways the policy intent is implemented to meet the climate change and waste management objectives in the Plan. Method 17 requires a whole of local government approach to develop the necessary investment and development for large scale waste management changes to occur.	

Climate change – natural hazards, adaptation and resilience

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
General						
S8.005	Carterton District Council	3.8 Natural hazards		Support natural hazards approach.	GW notes CDC's support.	A major consequence of climate change is sea level rise. Based on the Intergovernmental Panel on Climate Change 6th assessment report and measurements of vertical land movement, NZ SeaRise - Te Tai Pari O Aotearoa projects, ~~The~~ relative sea level in the Wellington region ~~is expected~~ to rise between 0.8 – 1.3 m ~~over half a metre~~ by 2100 but, 2.0 m of sea level rise by the end of the century cannot be ruled out.[1] [1] IPCC, 2021: Summary for Policymakers. In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, 31pp. ~~[1] Intergovernmental Panel on Climate Change (IPCC) (2007), *Climate Change 2007: The Physical Science Basis.* Summary for Policymakers. Contribution of working group I to the fourth assessment report of the IPCC, 18pp.~~ ~~In the medium to long term, climate change effects have the potential to increase both the frequency and magnitude of natural hazard events that already occur in the region.~~ Climate change will increase the frequency and magnitude natural hazards that already occur in the region and exacerbate the impacts and consequences from these events. For example, 30 cm of sea level rise on top of what has already occurred over the past 120 years, will mean that a 1% AEP (1:100 yr) coastal flooding event has the potential to occur every 1-2 years.
S16.11	Kāpiti Coast District Council	3.8 Natural hazards	3.8	Support: Amendments within this chapter that shift the focus from high-risk from natural hazards to risk from natural hazards: We note the intended shift to all risks from natural hazards rather than focusing on only high risk natural hazards aligns with GWRC's functions under section 30 of the Act. Decisions requested: Retain the shift in focus to address all risks from natural hazards. Insert a greater requirement for regional plans to include rules that manage natural hazard risks affecting new development and land uses.	GW notes KCDC's support for a shift to an all hazards approach. The operative RPS allocates the responsibility for developing natural hazard related landuse rules to TAs. Council has not requested this be reviewed in the current plan change.	
S20.16	South Wairarapa District Council	3.8 Natural hazards	3.8	Recognise that improved natural hazard frameworks are required. Experience from both the BOP and Waikato RPS is that frameworks using tolerable, intolerable and acceptable risk need substantial guidance to unpack what these terms mean during the development of DP frameworks to implement them. Our preference would be that this support material and guidance is prepared in advance of any change to the RPS becoming operative.	Have reworded relevant policies to use the more widely understood terms of low, moderate, high and bring the terminology in line with widely used risk assessment matrices.	
Introductory text						

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S12.018	Ngā Hapū o Ōtaki	3.8 Natural hazards	Introductory text	· High winds, extreme storms and tornados ~~that~~ can occur throughout the region and cause widespread damage to buildings, infrastructure and forestry.	The purpose of these bulleted lists is to highlight the main hazards affecting the region, not every hazard. High winds are part of extreme storms. Tornadoes occur occasionally in certain areas of the region and have more of a localized effect.	A natural hazard is defined in the Resource Management Act as any atmospheric, earth or water related occurrence (including earthquake, tsunami, erosion, volcanic, and geothermal activity, landslip, subsidence, sedimentation, wind, drought, fire, or flooding) which may adversely affect human life, property, or other aspects of the environment. On their own, natural processes do not constitute a hazard. Natural events become hazardous when they may adversely affect human lives. The Wellington region has one of the most physically diverse environments in New Zealand. It is also one of the most populous regions and, consequently, our communities are affected by a wide range of natural hazards. With the exception of geothermal activity, the region is subject to all types of natural hazard events. Commonly, there are two or more hazards associated with a given event. For example, a rainstorm may cause flooding and landslips. The three most potentially damaging and costly natural hazards events that can occur in the region are: • Earthquake: High magnitude earthquake (7.0+) from the rupture of a local fault (especially the Wellington Fault) affecting Wellington city, Hutt valley, Porirua, Kāpiti Coast and towns in Wairarapa District • Flooding: Major river flooding in the Hutt valley, Kāpiti Coast and the central Wairarapa plains. Flooding is the most frequently occurring hazard event in the region • Tsunami: Large tsunami (particularly one that is locally generated) affecting low-lying areas around Wellington Harbour and the southern bays, settlements along the southern and eastern Wairarapa coast, Porirua Harbour and the Kāpiti Coast Other natural hazards have more localised impacts but occur more frequently. These include: • Localised flooding and inundation from streams and stormwater overflow. This can occur throughout the region in low-lying areas – such as Porirua – around tributary streams of the larger rivers – such as the Hutt River – and in areas that have short steep catchments – such as Paekākāriki. • Coastal erosion and inundation, often associated with storm surge, affects some seafront and low-lying coastal developments in the region. Some sections of the coastline are in long term retreat – such as Paekākāriki and Te Kopi. Other areas have episodes of erosion that form part of a cycle of erosion and deposition – such as Paraparaumu or Riversdale. <u>Due to climate change induced sea level rise, it is expected that the areas impacted by coastal erosion and inundation will increase with time, and that this hazard will occur on a more frequent basis.</u> • Landslips in the hill suburbs of Wellington city, the Hutt valley, Eastbourne, Wainuiomata, <u>Porirua</u>, Paekākāriki and in the Wairarapa hill country. • Drought, especially in central Wairarapa and the coastal hills between Flat Point and Castlepoint. • Wildfire, particularly in hill suburbs on urban fringes near heavily vegetated slopes, including western and southern Wellington suburbs, Eastbourne, Wainuiomata, Hutt valley and Porirua, and farmland in the eastern Wairarapa hill country. • High winds that can occur throughout the region and cause widespread damage to buildings, infrastructure and forestry.
S23.28	Ātiawa ki Whakarongotai Charitable Trust	3.8 Natural hazards	Introductory text	The Trust support the amendments made to the introductory text of the Natural Hazards chapter. The Trust is pleased that Regional Council has amended the wording to annotate that climate change will have effects, which will result in increased frequency and severity of natural hazards.	GW notes Te Ātiawa support. Climate change was discussed in the original text and no changes were specifically made from the original except to update the sea level rise.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
						• Sedimentation and erosion of rivers and streams, river mouths and tidal inlets, that can exacerbate the flood risk by raising bed levels and undermining banks. People's actions, including mitigation measures and ongoing development in areas at high risk from natural hazards, can cause or increase the risk from natural hazards. Examples include seawalls or groynes that can cause localised erosion of the adjacent shoreline and building on landslip prone slopes. Stopbanks and seawalls can also create a sense of security and encourage further development, increasing the extent and value of the assets at risk. In the medium to long term, climate change effects ~~have the potential to~~ will increase both the frequency and magnitude of natural hazard events that already occur in the region. A major consequence of climate change is sea level rise. ~~The sea level is expected to rise over half a meter by 2100.[1]~~ Based on the Intergovernmental Panel on Climate Change 6th assessment report, and measurements of vertical land movement, NZ SeaRise - Te Tai Pari O Aotearoa projects relative sea level in the Wellington region to rise between 0.8 – 1.3 m by 2100 but, 2.0 m of sea level rise by the end of the century cannot be ruled out.[1] Climate change will increase the frequency and magnitude natural hazards that already occur in the region and exacerbate the impacts and consequences from these events. For example, 30 cm of sea level rise on top of what has already occurred over the past 120 years, will mean that a 1% AEP (1:100 yr) coastal flooding event has the potential to occur every 1-2 years. The main natural hazards associated with a rise in sea levels are coastal erosion and inundation. Sea level rise will also put increasing pressure on the coastal margin. As the shoreline adjusts, sediment will be redistributed around the coast and may cause shorelines to form new orientations. Beaches that are currently stable may begin to erode as the shoreline adjusts to a higher water level, while those that are currently eroding may experience an increased rate of retreat. Climate change ~~is expected to~~ will increase the intensity and duration of westerly weather systems and reduce easterly conditions. This will exacerbate differences in the regional climate, by bringing higher rainfall to the west and reducing coastal rains in the east. It will also bring longer periods of northerly gales to the entire region, particularly in the spring months. Western and southern areas of the region may also have higher rainfall in the winter, increasing the landslide risk during wet winters, particularly in extreme rainfall events. This will put pressure on stormwater systems and flood protection works. Higher rainfall may also result in higher rates of sedimentation at river mouths and in estuaries, increasing the flood risk in those areas by raising the base level of the river bed. It is also expected that central and eastern Wairarapa will become drier over the next 100 years. Droughts will occur more frequently and persist for longer periods. Research suggests that winter rainfall will decline in the long term, which may lead to a reduction in groundwater recharge rates and pressure on water resources. Dry conditions also result in a heightened risk of wildfire. The regionally significant issues and the issues of significance to the Wellington region's iwi authorities for natural hazards are: 1. ~~Effects of~~ Risks from natural hazards

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
						Natural hazard events in the Wellington region have an adverse impact on people and communities, businesses, property and infrastructure. 2. Human actions can increase risk and consequences from natural hazards People's actions including mitigation measures and ongoing development in areas at risk from natural hazards can cause, or increase, the risk and consequences from natural hazards. 3. Climate change will increase ~~both~~ the likelihood and consequences ~~magnitude and frequency of~~ from natural hazard events Climate change will increase the likelihood and consequences ~~risks~~ from natural hazard events that already occur within the region, particularly: (a) sea level rise, exacerbating the effects of coastal erosion and inundation, ~~and~~ river, pluvial and stormwater flooding in low lying areas, especially during storm ~~surge~~ tide events (b) increased frequency and intensity of storm events, adding to the risk from floods, landslides, severe wind, storm surge, coastal erosion and inundation (c) increased frequency of drought, placing pressure on water resources and increasing the wildfire risk ~~1 Intergovernmental Panel on Climate Change (IPCC) (2007), *Climate Change 2007: The Physical Science Basis.* Summary for Policymakers. Contribution of working group I to the fourth assessment report of the IPCC, 18pp.~~ [1] IPCC, 2021: Summary for Policymakers. In: Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, 31pp.
Issue 1						
S23.29	Ātiawa ki Whakarongotai Charitable Trust	3.8 Natural hazards	Issue 1:	The Trust seeks that the natural environment be referred to in Issue 1. The reasons these changes are sought are that the natural environment is at risk and can be significantly altered through a natural hazard event, many of these natural environments have value including mana whenua values and should be protected. The way the provision is currently worded suggests that we value and therefore protect things from natural hazards that have monetary value or human life. The Trust acknowledges that natural hazards are a naturally occurring phenomena and it is not possible or appropriate to protect everything, everywhere. However, there are parts of the natural environment that provide for mahinga kai, sites of significance including wāhi tapu, wāhi tupuna that should be considered in regards to reducing the impacts of natural hazards. Decision requested: Amend Issue 1 as follows: 1. Risks from natural hazards Natural hazard events in the Wellington region have an adverse impact on people and communities, the natural environment, businesses, property and infrastructure.		
S25.013	Wellington Water	3.8 Natural hazards	Issue 1:	For risk 3a, there is also an increased risk of urban/stormwater flooding in low lying areas, and not just river flooding. We won't be able to get the water out when the sea level is up.	Agree and have made consequential amendments to Issue 3.(a).	
Table 8(a)						
S23.30	Ātiawa ki Whakarongot	3.8 Natural hazards	Table 8(a):	The Trust seek an amendment to Objective 19, Table 8(a) to give effect to the Trust's proposed amendment to Issue 1. Decision requested:	Objective 19 has been amended to include the environment.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
	ai Charitable Trust			Amend Objective 19 as follows The risks and consequences to people, communities, the natural environment, their businesses, property and infrastructure from natural hazards and climate change effects are reduced.		
Objective 20						
S12.019	Ngā Hapū o Ōtaki	3.8 Natural hazards	Objective 20	Natural hazard and climate change mitigation and adaption activities do not cause or increase the risk from natural hazards or adversely impact on Te Mana o te Wai, Te Mana o te Taiao, natural processes, ecosystems, ~~and~~ biodiversity and sites of significance	Sites of significance have been added to policy 52 but will mostly be covered by the wording in the objective that includes Te Mana o te Wai, Te Rito o te Harakeke, natural processes, ecosystems and indigenous biodiversity.	Objective 20 Natural hazard and climate change mitigation and adaptation activities *minimise* ~~do not cause or increase~~ the risks from natural hazards ~~or adversely~~ and impacts on Te Mana o te Wai, Te Rito o te Harakeke, natural processes, indigenous ecosystems and biodiversity. ~~Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events.~~
S16.12	Kāpiti Coast District Council	3.8 Natural hazards	Objective 20	Oppose in part: We note natural hazard and climate change mitigation and adaptation activities may result in some adverse impacts on natural processes, ecosystems and biodiversity. We consider it is unrealistic for an objective to state that no adverse impacts will result from these activities. This would require an avoidance of these effects within the relevant policies, which is not what those policies require. Decision requested: Amend wording of Objective 20 to be consistent with the relevant policies i.e. to minimise adverse effects of hazard mitigation measures.	Wording changed to minimise that is defined to mean as low as reasonably practicable (ie, ALARP approach used in hazard risk management) and as defined in the PNRP.	
S23.31	Ātiawa ki Whakarongotai Charitable Trust	3.8 Natural hazards	Objective 20	The Trust support in part the amendments to Objective 20. The Trust seek further amendments to the objective. The Trust's position is that there are areas in the natural environment that have value to mana whenua that should be provided for in this objective. Decision requested: Amend Objective 20 as follows: Natural hazard and climate change mitigation and adaption activities do not cause or increase the risk from natural hazards or adversely impact on Te Mana o te Wai, Te Mana o te Taiao, areas associated with mana whenua values, natural processes, ecosystems and biodiversity.	These values are mostly captured in Te Mana o te Wai and to Rito o te Harakeke and the policy intent has been brought through into Policy 52 to specifically list sites of significance to mana/tangata whenua identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a city, district or regional plan.	
S20.17	South Wairarapa District Council	3.8 Natural hazards	Objective 20	Effectively precludes flood mitigation structures, and potentially 'in-river' works for managing gravel/erosion as these inherently alter the natural values of a waterbody, in particular flow regimes (including meander) and the habitats of fish and invertebrates. More clarity is required of this objective to identify what is intended here.	Policy 52 allows for flood mitigation structures where appropriate. However, wording has been changed in the objective to *minimise* rather than avoid effects on natural environment that is defined to mean as low as reasonably practicable (ie, ALARP approach used in hazard risk management) and as defined in the PNRP.	
S17.8	Masterton District Council	3.8 Natural hazards	Objective 20	It is possible that mitigation measures to protect human life, regionally significant infrastructure, or critical facilities such as hospitals, will impact on natural values of rivers and wetlands, etc. The RPS should look at including a hierarchy whereby mitigation or protection measures that impact on natural process are provided for if the need is great. Decision requested: Need to provide for impacts on the natural environment where the need for essential services or infrastructure is great. For example, protecting a communities drinking water supply.	Wording changed to say *minimise* rather than avoid effects on the natural environment that is defined to mean as low as reasonably practicable (ie, ALARP approach used in hazard risk management) and as defined in the PNRP.	
Policy 29						

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S16.20	Kāpiti Coast District Council	4.1 Regulatory policies	Policy 29:	Support in part: We support the amendments that will require regional plans to take a greater role in the management of subdivision, use and development in areas at risk from natural hazards. The focus on all levels of natural hazard risk is particularly supported as this would reflect the requirements of section 30 of the Act. We do not support proposed clause (c), as it is unclear what a low, tolerable or intolerable risk is. We do not see any additional benefit from this clause over what the New Zealand Coastal Policy Statement, and the existing wording of RPS Policy 29 already provide - i.e. the avoidance of inappropriate subdivision, use and development in hazard-prone areas. We note resource management case law exists on what is considered inappropriate subdivision, use and development with respect to natural hazard risks, but we are not aware of any case law that refers to low, tolerable or intolerable levels of risk. Decisions requested: Retain the shift in focus to all natural hazard risks. Delete draft clause (c) and retain the use of inappropriate.	Have reworded the policy to use the more widely understood terms of low, moderate, high and extreme to bring the terminology in line with more widely used risk assessment matrices and analysis metrics. The risk assessment will determine if the subdivision, use or development is appropriate or not. The NZCPS is directed at coastal development only, the RPS has to be broader. The risk-based approach provides a more nuanced management of development in hazard prone areas rather than just avoiding all inappropriate development.	Policy 29: ~~Avoiding inappropriate~~ Managing subdivision, use and development in areas at risk from natural hazards – district and regional plans Regional and district plans shall: (a) identify areas affected by natural hazards; and (b) use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over a 100-year planning horizon; (c) include objectives, polices and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and (d) include objectives, polices and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme. Explanation Policy 29 establishes a framework to: 1. identify natural hazards that may affect the region or district; and then 2. apply a risk based approach for assessing the potential consequences to new or existing subdivision, use and development in those areas; and then 3. develop provisions to manage subdivision, use and development in those areas. The factors listed in Policies 51 and 52 should be considered when implementing Policy 29 and when writing policies and rules to manage subdivision, use and development in areas identified as being affected by natural hazards.
S23.58	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies	Policy 29:	While the Trust supports the overall intent of the Policy 29, the Trust is concerned with details of the policy. In particular, (c), the Trust is concerned that Regional Council is determining how mana whenua can develop and use their land. The Trust acknowledges that it is important to avoid development in areas where risk is considered intolerable, any remnants of land held by Māori could be captured by this subclause effectively deeming this land unusable. The Trust would like to work with Regional Council to determine which areas are affected by natural hazards (both low/tolerable and intolerable) to work through any issues that capture land held by Ātiawa ki Whakarongotai uri.	These concerns are understood and have been expressed by a number of Iwi in the region. The intent of this policy is to support resilient development. TAs are directed to develop policy approaches to manage development in low to moderate hazard prone areas and avoid development in areas assessed has having a high to extreme risk from natural hazards. It wouldn't be sustainable to allow development where the risk was considered high to extreme. A new climate change policy (CC 19) strongly encourages councils to partner with mana whenua in the development of climate adaptation strategies. Additionally, a new policy (CC 19A) is proposed for GW to assist mana whenua in the development of iwi climate change adaptation plans. A new objective and method have also been included to support mana whenua in achieving resilience to climate change and for councils to assist iwi in the development of climate change adaptation plans.	
S17.32	Masterton District Council	4.1 Regulatory policies	Policy 29:	Covered in the WCDP review on the Natural Hazards Chapter - through GIS mapping, zones and appropriate overlays.	Yes, the WCDP is using a risk-based approach to hazards planning.	
S11.009	Kāinga Ora	4.1 Regulatory policies	Policy 29:	Whilst Kāinga Ora support the principle of this objective, the use of 'avoiding' is not supported as this leaves no scope for mitigation or management of subdivision, use and development from natural hazard areas The term avoiding also does not align with subsections (a), (aa) and (b) where management and mitigation is recognised as a tool for areas where the risks are lower which Kāinga Ora supports.	Amended to remove avoid in title and replace with manage.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				Decision requested: Amend title as follows: ~~Avoiding inappropriate~~ Identify and manage subdivision, use and development in areas at risk from natural hazards -district and regional plans		
S11.006	Kāinga Ora	4.1 Regulatory policies	Policy 29:	1. Kāinga Ora generally supports the changes to policies that allow for the reduction of the risks and consequences of natural hazards through subdivision, use and development and Kāinga Ora supports 'a risk hierarchy approach' instead of the need to avoid low to moderate hazard areas. Kāinga Ora do however note that Policy 29 includes the word 'avoiding' which does not align with the subsections of this policy which Kāinga Ora supports.	Amended to remove avoid in title and replace with manage to keep consistent with a more risk-based approach.	
S18.9	Waka Kotahi	4.1 Regulatory policies	Policy 29:	Please provide definition of tolerable and intolerable natural hazards (is this provided in other policy to be developed, e.g. NBA?)	Have reworded the policy to use the more widely understood terms of low, moderate, high and extreme to bring the terminology in line with more widely used risk assessment matrices and analysis metrics.	
S19.18	Porirua City Council	4.1 Regulatory policies	Policy 29:	Support identification of low, medium and high risk natural hazards, support risk-based approach. Support the specific and directive policy direction under (c) and (d), however the requirement to include objectives, policies and rules should also be included in (d).	Have reworded the clause d to include objectives, policies and rules in line with clause (c).	
S20.37	South Wairarapa District Council	4.1 Regulatory policies	Policy 29:	The proposed risk based approach does not have sufficient clarity to support in its proposed form. More about the approach needs to be articulated. Support the idea that low, moderate and high risk areas are identified. However, the requirement to identify 'areas affected by natural hazards' is too broad. The structure of the policy needs to be addressed with the management requirement at the top and the required undertakings below. While no hierarchy can be inferred in theory, the fundamental purpose of the policy is to support the avoidance of intolerable risk.	The aim of the aim is to allow the identification of hazard prone areas an then for the assessment to identify the level of hazard and risk that is posed by those areas. And thirdly, to develop an appropriate policy and planning approach to managing development in those areas. The hierarchy is implicit within the policy. MfE, MBIE and GNS Science have produced a lot of guidance on applying the risk based approach to RMA planning and planning practitioners have become increasingly knowledgeable with this approach in the past few years. The regional natural hazards management strategy provides a platform to get consistency in hazards risk management for planning in the region and has supported TAs in their plan review work.	
S14.033	Ngāti Toa	4.1 Regulatory policies	Policy 29:	It is positive to see a stronger wording of Policy29 and the intent of the policy is supported as the new wording provides. It is unclear of the Policy that specifies 'manage subdivision, use and development where the risks are low and tolerable'. The management of low and tolerable risks suggests that we might deal with cumulative effects if development is allowed in such areas. It could also mean for those who interpret the Plans where these areas are not necessarily discouraged and that we have confidence the cumulative and unknown impacts can be managed. It is unclear in this policy what tools and management options we would have that would help managing the subdivision, use and development in those areas.	Have reworded the policy to use the more widely understood terms of low, moderate, high and extreme to bring the terminology in line with more widely used risk assessment matrices and analysis metrics. The policy is intended to support the development of rules in city and district plans. The risk based approach promoted in this policy for natural hazards management has been used in the PCC district plan review.	
S9.20	Hutt City Council	4.1 Regulatory policies	Policy 29:	For (aa), rather than referring to a risk-based approach, this policy should describe the approach. Alternatively, 'risk-based approach' should be defined in the RPS. The reference to hazard sensitive activities adds very little to the	The RPS is designed to support the development of hazard risk management provisions rather than describe the risk-based approach. The risk-based	

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				policy as they would be covered by use. Suggest removing the reference or rewording to say particularly hazard sensitive activities if it is felt that these need to be highlighted in the RPS. Decisions requested: Re-write the policy to describe the risk-based approach (or define it in the definitions). Remove the specific reference to hazard sensitive activities.	approach is described in national guidance documents. The hazard sensitive activities is included to provide support and clarity in plan provision development for what are inappropriate activities that may face a high risk in high hazard areas and is line with the regionally consistent approach that is being incorporated into district plans in the region and to implement the regional natural hazards management strategy.	
Policy 51						
S23.85	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 51:	The Trust supports in part the proposed amendments to Policy 51. The Trust supports the intent of the policy to reduce the impact of natural hazards from inappropriate activities. The Trust has concerns with the potential impact of subclause (h) on Māori landowners. While the Trust acknowledge that subdivision, use or development or hazard sensitive activities should be avoided in high hazard areas, the Trust seeks that Māori landowners and mana whenua and Regional Council work in partnership to identify areas where this policy would impact on their ability to use their land. Due to the impacts of land confiscation, reclassification, sales, and land grabs very little land remains in Māori ownership. Therefore, the regional council should carefully consider how policies are developed to avoid creating further barriers for Māori to use their land thereby exacerbating existing grievances for Māori. In addition, to address this matter and to provide for mana whenua values in regards to natural hazards the Trust seeks inclusion of a new policy. Decision requested: Add a new policy as follows: Policy xx: Partner with mana whenua in decision-making and management processes for natural hazards, to recognise and provide for their relationship with water, land, sites, wāhi tapu and other taonga that is susceptible to such events.	Agree and have reworded to include 'risk' that allows and assessment of the type of activities that may be allowed in high hazard areas where the risk to the development could be considered low to moderate or reduced to that through design adaptation. A new climate change policy (CC 19) strongly encourages councils to partner with mana whenua in the development of climate adaptation strategies. A new objective and method have also been included to support mana whenua in achieving resilience to climate change and for councils to assist iwi in the development of climate change adaptation plans.	Policy 51: Minimising the risks and consequences of natural hazards – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to: (a) the ~~frequency and magnitude~~ likelihood and consequences of the range of natural hazards that may adversely affect the ~~proposal or development~~ subdivision, use or development, including ~~residual risk~~ those that may be exacerbated by climate change and sea level rise~~,~~ ~~(b) the potential for climate change and sea level rise to increase in the frequency or magnitude of a hazard event;~~ (c) whether the location of the subdivision, use or development will foreseeably require hazard mitigation works in the future; (d) the potential for injury or loss of life, social and economic disruption and civil defence emergency management implications – such as access routes to and from the site; (e) whether the subdivision, use or development causes any change in the risk and consequences from natural hazards in areas beyond the application site; (f) minimising effects ~~on the impact~~ of the ~~proposed~~ subdivision, use or development on any natural features that may act as a buffer to ~~or~~ reduce the impacts ~~of a~~ from natural hazards ~~event; and where development should not interfere with their ability to reduce the risks of natural hazards;~~ (g) avoiding ~~inappropriate~~ subdivision, use or development and *hazard sensitive activities* where the hazards and risks are assessed as high to extreme; ~~in areas at high risk from natural hazards;~~ (h) appropriate hazard risk management and/or adaptation ~~and/or mitigation~~ measures for subdivision, use or development in areas where the hazards and risks are assessed as low to moderate ~~hazard areas~~, including an assessment of residual risk; and (i) the allowance for floodwater conveyancing in identified overland flow paths and stream corridors; and (j) the need to locate ~~habitable~~ floor ~~areas~~ levels of habitable buildings and buildings used as places of employment above the 1% AEP (1:100 year) flood level, in identified flood hazard areas. Explanation Policy 51 aims to minimise the risk and consequences of natural hazards events through sound preparation, investigation and planning prior to development. This policy reflects a need to employ a precautionary, risk-
S16.35	Kāpiti Coast District Council	4.2 Regulatory policies	Policy 51:	Support: We consider the amendments to these policies appropriately elevate the consideration of all aspects of natural hazard planning. Decision requested: Retain the proposed amendments to Policies 51 and 52.	The amendments have been retained.	
S19.36	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy 51:	Do not support the avoidance approach for all use or development in high hazard areas. Some activities have an operational need to locate in these areas, for example in coastal environments toilet blocks, changing rooms, boat sheds, certain infrastructure etc.	Agree and have reworded to include 'risk' that allows and assessment of the type of activities that may be allowed in high hazard areas where the risk to the development could be considered low to moderate or reduced to that through design adaptation.	
S20.58	South Wairarapa District Council	4.2 Regulatory policies	Policy 51:	Generally support. It is unclear as to why the focus of the policy is to reduce. This term can only apply to existing risk, not new risk from development. Policy (j) needs revisiting as it appears to operate outside of the risk management framework.	Minimise has been reinstated to make terminology consistent through the policy suite.	
S18.15	Waka Kotahi	4.2 Regulatory policies	Policy 51:	Clarify how wording here relates to tolerable and intolerable hazards in Policy 29	Agree and have reworded policies accordingly to use risk-based approach language and consistency across	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
					the policy suite including removing the use of tolerable.	based approach, taking into consideration the likelihood of the hazard and the vulnerability of the development.
S17.50	Masterton District Council	4.2 Regulatory policies	Policy 51:	Increased scope to include business or places of employment. Further clarity sought on what these places of employment are and the implications for these landowners	It includes sites used for business, retail and industrial landuse. It is intended to capture both residential and commercial premises in identified flood hazard areas.	
S25.027	Wellington Water	4.2 Regulatory policies - matters to be considered	Policy 51:	Clause (h) imposes an unnecessary avoid policy on all of Wellington Water's works within streams or the CMA, which are high risk areas under the pNRP. There seems to be slightly different use of risk and hazard between the pNRP and the RPS Why is (j) limited to places of employment? RPS should define (not map) low, moderate and high hazard areas	The policy has been reworded to use risk based approach language to allow development in low and moderate hazard areas with appropriate mitigation or design and avoid development in high hazard areas or where development is not considered to be designed to have a low to moderate risk. This allows for hazards mitigation activities and infrastructure to be built in high hazard areas provided the risk to the infrastructure can be managed to be low to moderate. The policy mentions habitable spaces (ie, residential) and places of employment (ie, commercial buildings).	
S9.27	Hutt City Council	4.2 Regulatory policies - matters to be considered	Policy 51:	If (j) is trying to say that floor levels of habitable buildings should be above the 1% AEP flood level, it would be better to say this directly, rather than housing this requirement within a policy about what regard should be given to. Alternatively, this direction should be removed, with TAs given the discretion to determine how to address flood hazard risk. Decision requested: Either add a specific policy that requires floor heights above the 1% AEP or remove the reference to minimum floor heights.	The policy is clear about the need to locate the floor levels of residential and commercial buildings above the 1% AEP flood level in identified flood hazard areas. This policy compliments and supports Policy 29 in hazard identification and development of policies to avoid development in areas considered to have a high hazard and pose high risk to development. Policy 29 provides the flexibility to apply this approach in a regulatory manner.	
S14.053	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 51:	It is important to support this policy as a consideration and appreciate the detail that it goes into covering all the potential issues we experience from natural hazards. It is noticeable there are water quality and overflow issues with our three-water network and flooding exacerbates these issues, and further making them more hazardous by the floods. There are not any connections created in the Policy 51. Yet this is an important consideration for Tangata Whenua. Clause (i) includes moderate risks; it is not convincing, if the risk is moderate, the Policy should not automatically allow that subdivision, use and development. Only if the risk is low then this could justify a mitigation if the hazard occurred. Clause (ia) is not clear; District Plans are responsible to make rules, making sure that the developments do not block the overland flood paths; do we consider the RPS should mention this, too? What policy gap this is looking into addressing or is it doubling up? It is unclear whether the clause (j) was too conservative, taking into account 1 in a 100-year flood as we are seeing them more often in the face of worsening impacts of Climate Change and global warming.	The policy approach for natural hazards in the RPS is 'all hazards' including stormwater and surface flooding. There is a direction in the plan change to more specifically incorporate environmental values and principles of Te mana o te Wai. In addition, there are specific stormwater policies that address the issue of contamination. Have reworded to include 'risk' in clause (i) that allows and assessment of the type of activities that may be considered acceptable in moderate hazard areas where the risk to the development could be considered low to moderate or reduced to that through design adaptation. 1:100 year or 1% annual recurrence interval (ARI) planning for hazards is an accepted risk management approach. If the ARI changes over time as a result of climate change, then the direction in the RPS is to adapt likewise in order to maintain resilience and minimise the impacts.	
Policy 52						
S10.018	Wairarapa Iwi	4.2 Regulatory	Policy 52:	Strong need for this policy as this is where a lot of damage has been done to natural environment. Need to ensure soft	GW notes Wairarapa Iwi support of this policy approach.	Policy 52: Minimising adverse effects of hazard mitigation measures – consideration

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
		policies - matters to be considered		engineering is prioritized over hard engineering (which should be a last resort). Need to reorder provisions to reflect that priority. Add reference to significant cultural sites and taonga species in policy 52(e)	The policy has been reworded to clarify the need to assess other non-structural or soft engineering options that may be lower impact and more appropriate.	When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given to: ~~the need for structural protection works or hard engineering methods;~~ (a) whether non-structural, soft engineering, *green infrastructure*, room for the river or Mātauranga Māori options provide a more appropriate or suitably innovative solution; (b) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future; (c) the long-term viability of maintaining the structural protection works with particular regard to how climate change may increase the risk over time; (d) adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity; (e) sites of significance to mana/tangata whenua identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a city, district or regional plan. (f) a no more than minor increase in risk to nearby areas as a result of changes to natural processes from the hazard mitigation works; (g) the cumulative effects of isolated structural protection works; (h) any residual risk remaining after mitigation works are in place, so that they minimise ~~reduce and do not increase~~ the risks from ~~of~~ natural hazards. Explanation Policy 52 recognises that the effects of hard protection structures can have adverse effects on the environment, increase the risks from natural hazards over time and transfer the risks to nearby areas. It provides direction to consider lower impact methods of hazard mitigation such as non-structural, soft engineering, *green infrastructure*, room for the river or Mātauranga Māori options, that may be more appropriate providing they can suitably mitigate the hazard.
S16.36	Kāpiti Coast District Council	4.2 Regulatory policies	Policy 52:	Support: We consider the amendments to these policies appropriately elevate the consideration of all aspects of natural hazard planning. Decision requested: Retain the proposed amendments to Policies 51 and 52.	The amendments have been retained.	
S23.86	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 52:	The Trust supports in part the proposed amendments to Policy 52. The Trust supports the overall intent of the policy. The Trust seeks further amendments to provide for mana whenua values. The Trust supports reference to mātauranga Māori options. The Trust is encouraged that mātauranga Māori is finally being recognised by Regional Council given it offers solutions to many resource management issues we face today. The Trust seeks that mana whenua lead and partner with Regional Council to develop such solutions. This includes tikanga to protect mātauranga Māori, including how it is used, access, stored and shared. The Trust supports the intent of the policy to better provide for and encourage the use soft engineering, green infrastructure solutions over hard structural and engineering solutions. Decision requested: The Trust inclusion of the following subclauses: (cd) adverse effects on Māori freshwater values, including mahinga kai (ce) adverse effects on mana whenua relationship with their culture, land, water, sites, wāhi tapu and other taonga	The policy has been reworded to include mahinga kai. Other values are considered through the inclusion of Te Mana o te Wai, Te Rito o te Harakeke, effects on natural processes, local ecosystem and indigenous biodiversity and sites of significance to mana whenua. A new policy is proposed for GW to assist mana whenua in the development of iwi climate change adaptation plans.	
S19.37	Porirua City Council	4.2 Regulatory policies	Policy 52:	Guidance will be needed on assessing adverse effects on Te Mana o te Wai and Te Mana o te Taiao.	This guidance can be found in national guidance documents on the Freshwater NPS and draft NPS on indigenous biodiversity.	
S20.59	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy 52:	Generally support. However, 'innovative' solutions need to be reframed or removed. Just because its innovative doesn't mean it's appropriate. More a policy structure issue. Support consideration long term and climate affected viability of works being considered. Should also include long term affordability to the community. In terms of CC - does adjacent go far enough in terms of potential effects on property of hard structures?	The policy direction is for these options to be considered and an assessment made of the appropriateness of the method. It is not intended to promote innovative yet inappropriate solutions. The policy has been reworded to clarify this. The 'long term viability' of the works is intended to include environmental, engineering and financial aspects in the consideration. Clause (g) has been reworded to replace 'adjacent' with 'nearby areas'.	
S17.51	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy 52:	Objective 20 - does this mean no more river protection works? Further clarity sought with regard to river protection works	No, it does not mean no more flood protection works. The objective is intended for hazard mitigation to consider the broader impacts they can have on the environment and was expanded from the existing objective. For avoidance of doubt, the policy has been reworded to clarify.	
S9.28	Hutt City Council	4.2 Regulatory policies -	Policy 52:	Clause (b) - while alternative options should be considered, whether something works is more important than whether it is	The policy direction is for these options to be considered and an assessment made of the	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
		matters to be considered		innovative. So this policy should still ensure that 'innovative' solutions will achieve the outcome that is sought. Decision requested: Amend the policy to ensure that innovative solutions are proven to work.	appropriateness of the method. It is not intended to promote innovative yet inappropriate solutions.	
S14.054	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 52:	Some of the new additions to the policy are encouraging, such as the long-term viability; no increase in risk to adjacent properties, and adverse effects on Te Mana o Te Wai, Te Mana o te Taiao, and that they are considered as part of the consent applications. However, the impacts of hazard mitigation measures to be minimised: these mitigations do alter the site and change the environment in ways that we cannot bring it back. The wording of the first clause (a)'justifiable', for instance is a subjective word and all flood hazard structures are justifiable at some point in time and that this may not be able to be evaluated from an objective perspective. Policy 52 does not elaborate how consent planner will make their assessment. Same with the cumulated effects, how these are assessed are important and may be made on some judgement and value points. The word 'minimise' still leaves policy door open for those who are inclined to think bringing hard engineering structures to the scene is the ultimate answer.	The first clause in this policy has been deleted to avoid confusion over its use. In many cases, during consent applications, there are expert assessments across these points including cultural impact assessments. They are undertaken to be commensurate with the size and scale of the application. Minimise is included to signal the direction to keep impacts as low as reasonably practicable. In some instances, hard protection works are unavoidable or are required to maintain existing structures. So a consenting pathway needs to be available for these situations. The policy is very clear about the need to avoid structural protection works unless they are necessary to protect existing development, regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard management strategy that represents the best practicable option for the future.	
Policy CC.17						
S23.100	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy CC.17:	In principle the Trust supports Policy CC.17	Support noted	Policy CC.14: Climate-resilient urban areas – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, provide for actions and initiatives, particularly the use of nature-based *solutions*, that contribute to climate-resilient urban areas, including: (a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10% *tree canopy cover* at a suburb-scale by 2030, and 30% cover by 2050, (b) the application of water sensitive urban design principles to integrate natural water systems into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality, (c) capturing, storing, and recycling water at a community-scale (e.g., by requiring rain tanks, and setting targets for urban roof area rainwater collection), (d) protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural hazards and the effects of climate change, (e) providing for efficient use of water and energy in buildings and infrastructure, and
S16.49	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy CC.17:	Oppose: There is no statutory basis under the RMA or higher-level statutory planning documents to require particular regard be given to most of the matters raised by these draft policies when considering an application for resource consent, a notice of requirement, or a change to a district plan. Given the lack of a statutory basis for these matters, it is unclear how district plans could reasonably give particular regard to any of them in its decision making under the RMA. The only draft provision that city and district councils could reasonably have particular regard to when considering a resource consent or notice of requirements would be activities that fall under section 108(2)(c) of the Act as follows: (1) Except as expressly provided in this section and subject to section 108AA and any regulations, a resource consent may be granted on any condition that the consent authority considers appropriate, including any condition of a kind referred to in subsection (2). (2) A resource consent may include any 1 or more of the following conditions:	All matters listed are valid matters to have particular regards to under the RMA, It is critical that district and the regional council act now to take all opportunities to prepare our communities for the impacts of climate change projected to occur due to already locked-in warming	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				(c) a condition requiring that services or works, including (but without limitation) the protection, planting, or replanting of any tree or other vegetation or the protection, restoration, or enhancement of any natural or physical resource, be provided:		(f) <u>buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.</u> <u>Explanation</u> <u>Climate change, combined with population growth and housing intensification, is increasingly challenging the resilience and well-being of urban communities and natural ecosystems, with increasing exposure to natural hazards, and increasing pressure on water supply, wastewater and stormwater infrastructure, and the health of natural ecosystems.</u> <u>This policy identifies the key attributes required to develop climate-resilience in urban areas and requires district and regional councils to take all opportunities to provide for actions and initiatives, particularly nature-based solutions, that will prepare our urban communities for the changes to come.</u>
S19.50	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy CC.17:	How can this policy be implemented through a resource consent? Clunky wording: Provide for climate resilient urban environments by providing climate resilient neighbourhoods...? (a)This needs to be considered in light of RMA restrictions of not managing urban vegetation. (b) What is a climate resilient neighbourhood? (c) What is a nature-based solution (definition is very vague). (d) Should this read climate change resilient design?	Drafting revised for to provide greater clarity	
S20.72	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy CC.17:	Support some level of vegetative cover, climate resilience, nature based solution and energy efficient building design requirement for 'urban environments'. However, for rural centres that aren't included in that definition we would like the policy to 'encourage' that type of development. This would assist Council including these requirements in the District Plan, but without onerous costs which could exceed any material climate benefits.	Wording changed to require actions and initiatives that contribute to climate-resilient urban areas, including:	
S17.59	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy CC.17:	What guidance and support will we give to those regarding the tree canopy cover in urban environments? Further work required to make this policy consistent with housing intensification at a national level	New Method UD.2 is to Prepare development manuals and design guidance to allow and encourage development consistent with a range of policies This will provide guidance on the attributes for a Climate-resilient urban area	
S9.35	Hutt City Council	4.2 Regulatory policies - matters to be considered	Policy CC.17:	The intent of this policy is supported but clarification is required on a number of aspects. Clarity is required about what constitutes a 'climate resilient neighbourhood' or 'climate resilient urban environments'. This policy would be better framed in terms of what constitutes a 'climate resilient environment'. As currently drafted this is unclear, particularly as the policy states 'particular regard shall be given to provide for climate resilient environments by providing: ... (b) Climate resilient neighbourhoods.' It is also unclear how the achievement of clause (a) could be measured looking at a single development proposal when the 30% goal is on a much broader urban environment scale. This could be fixed through an amendment to the policy to say '...particular regard shall be given to how the proposal contributes to....' While these aspirations are supported, the policy as drafted provides a confusing mix of matters that can be delivered at a site scale and those that can only be measured and delivered on a broader, urban environment scale. Re-drafting is required to ensure this policy does not inadvertently create unachievable standards for future development. The use of 'and' at the end of each clause also suggests that a proposal must deliver all of	Drafting revised for to provide greater clarity	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				these matters which, as noted above, are unlikely to be achievable nor reasonably able to be assessed at smaller scales. Question the achievability of the 30% target, especially by 2030. Trees and their canopies take time to grow and taking into account building coverage, our commercial centres and industrial areas, most of the area of streets, open space that's vegetated but not with trees, the river corridor, sportsfields, golf courses, and residential land that has MDRS and can't have tree protection etc., etc. the 30% target will be impossible to achieve. The 30% tree canopy by 2030 also should not be driven through a document such as the RPS particularly as not all of this tree canopy could be expected to be delivered via private development alone. Presumably there will need to be public realm activities that contribute to this as well, which sit outside of the bounds of RMA planning documents. Suggest a more focused approach to this clause. Decision requested: Re-draft this policy to provide guidance on what constitutes 'climate resilient' neighbourhoods and urban environments. It should not be prescriptive, but provide clarity about what practical matters need to be considered in a consenting and plan-making process. Remove target for 30% tree canopy by 2030.		
Policy CC.19						
S12.048	Ngā Hapū o Ōtaki	4.4 Non-regulatory policies	Policy CC.19:	(e) Recognise and provide for of Te Mana ote Wai and Te Mana o te Taiao;	This is a non-regulatory policy aimed at councils to develop strategic climate change adaptation plans. The list provides a range of options that should be considered in the development of these plans.	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes – non-regulatory Regional, city and district councils should, under the Local Government Act 2002, develop and implement strategic climate change adaptation plans that partner with mana whenua / tangata whenua and engage local communities in the decision-making process to develop and implement strategic climate change adaptation plans that map out management options over short, medium and long term timeframes, using a range of tools and methods including, but not limited to: (a) Te Ao Māori and Mātauranga Māori approaches; (b) Dynamic adaptive planning pathways or similar adaptive planning approaches; (c) City, district or regional plan objectives, policies and rules that address subdivision, use and development for areas impacted by climate change and sea level rise; (d) Options for managed retreat or relocation; (e) A consideration of Te Mana o te Wai and Te Rito o te Harakeke; (f) Hazard mitigation options including soft engineering, *green infrastructure* or room for the methods to reduce the risks from natural hazards exacerbated by climate change and sea level rise; and (g) Equitable funding options required to implement the programme. Explanation Policy CC.16 provides a range of options for development and implementation of adaptation strategies or plans to suit a particular programme or local circumstances. In some instances, the outcomes may
S10.020	Wairarapa Iwi	4.4 Non-regulatory policies	Policy CC.19:	Include in provision 'Partner with MW and engage with local communities'. Check consistency with the others. Policies talk about 'biodiversity' - should it be 'indigenous biodiversity'	The policy states to partner with mana whenua and engage local communities. Policies have been reworded to say indigenous ecosystems and biodiversity.	
S23.110	Ātiawa ki Whakarongotai Charitable Trust	4.4 Non-regulatory policies	Policy CC.19:	The Trust supports in part Policy CC.19. The Trust offers the following comments; any potential climate change adaptation programme developed under this policy requires the political will to drive implementation and enforcement. Without statutory obligation the Trust is concerned that such programmes may not achieve their desired outcomes. The Trust supports that te ao Māori and mātauranga Māori approaches can offer solutions and options for climate change adaptation. The Trust is concerned at the lack of methods to ensure that mana whenua are enabled through resourcing and support to contribute to this policy in a fair and equitable manner. It is only Māori who can provide mātauranga Māori and a local context of Te Mana o te Wai and Te Mana o te Taiao. Further, the Trust questions whether Policy CC.19 fits within the criteria of a non-regulatory policy (as Regional Council has drafted). Subclause (c) and potentially (d) are forms of regulatory action.	A new policy (CC 19A) and method is proposed for GW to assist mana whenua in the development of iwi climate change adaptation plans. The policy has been reworded to say that councils 'should' undertake this work as opposed to 'shall', as it is directed under the Local Government Act and the RPS cannot direct this work under other statutes, it can only encourage it. The development of adaptation strategies may lead to changes being incorporate into regulatory documents, but the policy itself is not regulatory *per se*.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S19.56	Porirua City Council	4.4 Non-regulatory policies	Policy CC.19:	How is objective CC.5 to be measured - people understand what climate change means for their future? Support Policy CC.19 in principle. We note that clause (c) is a regulatory method.	Yes, the development of adaptation strategies may lead to changes being incorporate into regulatory documents, but the policy itself is not regulatory *per se*.	require implementation as objectives, policies, and rules in regional or district plans, but this is not expected to be a requirement. Policy CC.17: Iwi climate change adaptation plans – non-regulatory Regional council will assist mana whenua / tangata whenua in the development of iwi climate change adaptation plans to manage impacts that may affect Māori relationships with their whenua, tikanga and kaupapa Māori, sites of significance, wai Māori and wai tai values, mahinga kai, wāhi tapu and other taonga. Explanation Policy CC.17 recognises that climate change will disproportionately affect Māori, especially as a lot of Māori land is located in hazard prone areas near rivers and the coast. This policy directs the regional council to assist mana whenua / tangata whenua, where appropriate, with the development of iwi-led climate change adaptation plans.
Method CC.1						
S23.114	Ātiawa ki Whakarongotai Charitable Trust	4.5.2 Non-regulatory methods - information and guidance	Method CC.1:	The Trust seek that regional council partner with mana whenua to develop information about climate resilient practices in accordance with mātauranga Māori and mana whenua values. Decision requested: Method CC.1: Rural land use and climate resilience In partnership with mana whenua, the regional council shall prepare and disseminate information about climate resilient practices, including changes in land use and land management practices: (a) to respond to climate change and provide water resilience; (b) that will reduce gross greenhouse gas emissions; and (c) that will increase rural resilience, including nature-based solutions to climate change; and (d) that will protect and provide for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and (e) Recognise and provide for mātauranga Māori	Two new climate change policies (CC.16 and CC.17) have been introduced directing councils to partner with mana whenua in the development of climate change adaptation strategies, that includes a strong focus on Te Ao Māori and Mātauranga Māori. In addition, Method 22 has been rewritten to include assisting mana whenua in the development of iwi climate change adaptation plans.	Method CC.1: Deleted due to duplication with other Methods Note: there is now a new Method CC.1 in the Proposed RPS Change 1.
S20.79	South Wairarapa District Council	4.5.2 Non-regulatory methods	Method CC.1:	Support GWRC developing and providing good practice material for rural land users to promote climate change resilience. As above, the exercise should be collaborative and include the parties identified above and also relevant sector group representatives.	Deleted due to duplication with other Methods	
Method 22						
S23.118	Ātiawa ki Whakarongotai Charitable Trust	4.5.2 Non-regulatory methods - information and guidance	Method 22:	The Trust seeks to partner with Regional Council to develop a schedule of indigenous ecosystems and habitats with significant indigenous biodiversity values and plan provisions. This is a matter that is of significance to mana whenua. The health of indigenous ecosystems and habitats is inextricably linked to the health and well-being of the people including mana whenua and the ability to practice and exercise traditional and cultural norms. In addition, this is a matter for which mana	The PNRP has a number of schedules covering sites of significance for mana whenua and biodiversity. A new climate change policy has been introduced directing councils to partner with mana whenua in the development of climate change adaptation strategies, that includes a strong focus on Te Ao Māori and Mātauranga Māori.	Method 14: Information on natural hazard and climate change Undertake research, prepare and disseminate information about natural hazards and climate change effects in order to: (a) guide local authority planning and decision-making; and (b) raise awareness and understanding of natural hazards Method 22: Integrated hazard risk management and climate change adaptation planning

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				whenua hold significant knowledge (including historical knowledge) at a local context.	In addition, Method 22 has been completely rewritten to include assisting mana whenua in the development of iwi climate change adaptation plans.	Integrate hazard risk management and climate change adaptation planning in the Wellington region by: (a) developing non-statutory strategies, where appropriate, for integrating hazard risk management and climate change adaptation approaches between local authorities in the region; (b) developing consistency in natural hazard provisions in city, district and regional plans; (c) assisting mana/tangata whenua in the development of iwi climate change adaptation plans. Delete Method 23 ~~Method 23: Information about natural features to protect property from natural hazards~~ ~~Prepare and disseminate information about how to identify features in the natural environment that can offer natural protection to property from the effects of erosion and inundation.~~
S16.55	Kāpiti Coast District Council	4.5.2 Non-regulatory methods - information and guidance	Method 22:	Oppose in part: We also note the regional council is in a stronger position to be able to manage the potential increase in risk posed by additional development due to rules in regional plans not being subject to the limitations of section 10 of the RMA. Notwithstanding this advantage, there appears to be preference for GWRC to leave it to city and district councils to address development within areas subject to significant risks posed by natural hazards. Decision requested: Amend the provisions to more specifically require regional plans to include rules and standards for subdivision, use and development within areas identified as being vulnerable to natural hazards.	This method has been rewritten to better support the way in which hazards can be managed in the region. Policy 29 is explicit in the need for district plans to include rules to manage subdivision, use and development in areas at risk from natural hazards.	
Definitions						
S12.057	Ngā Hapū o Ōtaki	Appendix 3: Definitions	Hazard sensitive activity	Means any building that contains one or more of the following activities: · community facilitycultural facility...	In this definition, a community facility is a cultural facility ie, art gallery. In addition, the definition includes kōhanga reo and marae.	Means any building that contains one or more of the following activities: • community facility • early childhood centre • educational facility • emergency service facilities • hazardous facilities and major hazardous facilities • healthcare activity • kōhanga reo • marae • residential activity • retirement village • research activities • visitor accommodation

Climate change – nature-based solutions

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
General						
S10.002	Wairarapa Iwi	3.1 Climate Change		Decision requested: Strong support for nature-based solutions	Noted	
S12.026	Ngā Hapū o Ōtaki	3.11 Soils and minerals	3.11	Decision requested: 1. Contaminated land Some land where hazardous substances have been manufactured, used or stored - such as gasworks, petrol stations, landfills, ~~and~~ sheep dips, **and long-term agricultural and horticultural spray use** -have contaminated soils. Development of that land for new uses may not be safe if soils are contaminated.	Soils chapter is not being reviewed until 2024	
S24.013	Wellington City Council	3.11 Soils and minerals	3.11	Decision requested: **Introductory text:** 3.11 b) - considerations must be taken to address environmental impacts as well as the associates GHG emission footprint from the activities to extract the resources. This requires a level of understanding of the national and regional pictures in terms of infrastructure demand/supply, and multi-criteria analysis to ensure resource efficiency is taken into	Soils chapter is not being reviewed until 2024	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
				account from both environmental and climate change perspectives.		
Table 11						
S23.37	Ātiawa ki Whakarongotai Charitable Trust	3.11 Soils and minerals	Table 11:	The Trust opposes the introductory text of the Soils and Minerals chapter as it provides the bare minimum reference to mana whenua. It is not clear how the current wording captures issues of significance to the Trust in regards to soils and minerals. The Trust seeks that Regional Council partner with the Trust to redraft the introductory text in accordance with the values identified in our Kaitiakitanga Plan (Whakarongotai o te Moana, Whakarongotai o te wā). In particular, the Trust opposes 'Issue 5. Limited mineral resources'. The views and concerns of the Trust are not reflected in the wording of Issue 5 (or in fact this chapter). The Trust does not support extraction of minerals from rivers, seabeds, beaches and coastal cliffs and inland quarries.	Soils chapter is not being reviewed until 2024	
S19.8	Porirua City Council	3.11 Soils and minerals	Table 11:	Objective 22B: Objective needs to be clearer on what development - greenfield development or rural activities? How should it be strategically planned? What does effectively managed mean? If this objective acknowledges that greenfield land is required for both housing and business land we support it in principle.	Soils chapter is not being reviewed until 2024	
Objective 29A						
S12.027	Ngā Hapū o Ōtaki	3.11 Soils and minerals	Objective 29A:	(NB: Very supportive of this measure) Decision requested: (NB: Very supportive of this measure)	Support Noted	*Note this fully replaces Objective 29A* **Objective CC.3A** By 2030, there is a significant increase in the area of permanent forest in the Wellington Region, with optimal benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic well-being.
S23.38	Ātiawa ki Whakarongotai Charitable Trust	3.11 Soils and minerals	Objective 29A:	The Trust supports in part the inclusion of Objective 29A. The Trust acknowledges that soil erosion is a significant issue where the effects impact on freshwater, particular the impacts of increased sedimentation. The Trust also recognise that there are multiple benefits derived from planting hill country, preferably in indigenous permanent forestry. However, the Trust recognises that proposed changes away from plantation forestry on hill country will be of concern to Māori with interest in plantation forestry. Due to the impacts of land confiscation, reclassification, sales, and land grabs any remnants of Māori land is isolated and fragmented; there are limited options for Māori landowners to make an economic return of their land, plantation forestry and the investment in the carbon economy has been an option for some Māori. The Trust suggests that Regional Council support and work with Māori land owners, Māori Trusts, iwi and hapū that may have plantation forestry interests in the region to address the issue.	Support for objective noted. Concerns re provisions considered in relation to policy CC.6 (updated to CC.2), CC.16 (deleted) and CC.18 (deleted) and method CC.4.	
S17.14	Masterton District Council	3.11 Soils and minerals	Objective 29A:	Method CC.3 Forestry Management Spatial Plans need to be codeveloped with all three Wairarapa District Councils and our local communities, especially our rural and farming communities. Needs to be a balance between environmental wellbeing and social/economic wellbeing of our communities.	Added partnership approach to developing Forest spatial plan – refer to Method CC.4 Objective revised to provide for optimal outcomes for RM matters.	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
				Decision requested: Masterton District Council to be part of preparing this plan as well as sector and communities.		
S20.21	South Wairarapa District Council		Objective 29A:	Increase resilience of land vulnerable to erosion, particularly in catchments where water quality is not achieved and co-benefit push is supported in principle. However, we would want some clarity as to the locations and extent of 'erosion prone land'. Concern that this is simply a further enabling tool for afforestation in the Wairarapa. Drafting should be improved.	Objective revised to provide for optimal outcomes for RM matters. Method CC.4 Forest spatial plan will provide clarity about highly erodible land	
S14.014	Ngāti Toa	3.11 Soils and minerals	Objective 29A:	Decision requested: It is encouraging to see an objective that is aiming to increase the resilience of the land. The policies to implement this objective seems to be limited to forest cover and extent. Was there any deliberation of using District Plan and land use controls to strengthen the tools that are available to us increasing land resilience, not just a regional policy. Another consideration is the negative impacts of development on the decrease of resilience, how does the RPS address that?	Refocused as a Climate change provision – primary aim is for Carbon sequestration but this is to be tempered by achieving co-benefits for land stability, indigenous biodiversity etc	
Policy CC.6						
S12.040	Ngā Hapū o Ōtaki	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.6:	(Recommend that # of hectares be at least 30% cover) Decision requested: Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of forest in the region to contribute to achieving net-zero greenhouse gas emissions by 2050 *(or set a target to achieve an additional xx ha of forest by 2050)* while: (a) promoting and supporting the planting or regeneration of permanent indigenous forest in preference to exotic species, particularly on *highly erosion-prone land,* **wetlands, dunes,** and in catchments where water quality targets for sediment are not reached; and (b) avoiding *plantation forestry* on *highly erosion-prone land***.**	Policy focus is to increase forest cover for C sequestration value, noting this is the key opportunity to mitigate GHG emissions in the short-term Protection of wetlands and dunes addressed in Policies CC.8 and .14 and Methods CC.7 and .8	**Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land - regional plans** Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of permanent forest in the region to contribute to achieving net-zero greenhouse gas emissions by 2050, while: (a) Promoting and incentivising the planting or regeneration of permanent indigenous forest over exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached, and (b) avoiding plantation forestry on highly erodible land and in catchments where water quality targets for sediment are not reached. Explanation This policy recognises that, while there is a need for increased forest extent across the Wellington Region to help achieve net zero emissions by 2050, offsetting through carbon sequestration is only a short-term solution and that there are significant risks associated with unfettered afforestation across the region. The policy directs regional plans to develop provisions that will support “right tree-right place”, seeking to ensure that an increase in forest extent for its sequestration benefits will be implemented in a way that maximises the co-benefits for indigenous biodiversity and aquatic ecosystem health, and provide for social and economic well-being as directed by Objective CC.3A. Clause (b) responds to the high risk of harvesting forest in areas that are highly erodible and in catchments where waterways already have high sediment loads. The National Environmental Standards for Plantation Forestry enables regional plans to regulate plantation forestry for the purpose of protecting freshwater quality.
S10.023	Wairarapa Iwi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.6:	Decision requested: Support the preference for indigenous over exotic and want to make sure that stays. Seeking stronger language and provision for financial incentives. Need science foundation to make good words in policy and method CC.4 happen.	Resourcing through Method CC.8 Support for protecting, enhancing and restoring priority indigenous ecosystems and nature-based solutions Agree re need for good science to underpin regional spatial plan that helps give effect to this package of provisions	
S23.69	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land	Policy CC.6:	While the Trust supports the overall intent of the Policy CC.6 to increase forest cover to reduce greenhouse gas emissions, the Trust are concerned with details of the policy. In particular (c), the Trust are concerned that Regional Council is determining how mana whenua can develop and use their land. The Trust seek that further engagement occurs with Māori who have land that could be affected by Policy CC.6.	Need for engagement noted Involvement of mana whenua in Method CC.4 noted	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		Transport Plan				
S17.42	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.6:	Decision requested: Masterton District Council to be one of the organisations involved with preparing this plan as well as relevant sector and communities	Amended Method CC.4 that spatial plan to be prepared using a partnership approach	
S19.28	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.6:	We support promoting and supporting the planting or regeneration of permanent indigenous forest in preference to exotic species.	Support Noted	
S20.45	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.6:	SWDC are cautious about Regional Plans setting afforestation targets. While supported in principle, the use of offsets to carbon emissions should be secondary to reduction in discharges and should be proportionate to the discharges in the environment in which they are planted. Rural communities should not suffer for the lack of reductions in emissions from urban environments. The goal setting should be undertaken with the communities that will be affected. The co-benefits approach with water quality and indigenous biodiversity is supported. These should play a part in staging any planting over production land with less or no concerns around water quality. We would like to see provisions avoiding plantation forestry on highly productive land included in the policy. It is unclear why is this one of the only policies that refers to net zero emissions?	Amended objective to acknowledge need for wholistic approach to increase tree planting – aim of policies and method is to support 'right tree-right place' outcome	
S14.037	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.6:	Decision requested: It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, itis not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this. The second point regarding Policy CC.6, CC.7 andCC.8, are the components that are related to District Plans. For Policy CC.7and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy. It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved	Planting trees is just one example of a Nature-based solution. Other provisions such as policies CC.8,.14, .17 and Methods CC7 and .8 promote and support these Note that CC.6 is focused on regional councils. Consideration policy which applied to both region and districts has been deleted	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
				through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.		
S23.147	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.6:	Decision requested: While the Trust in principle supports the intent of the proposed changes, such as proposed Policy CC.6, it is worthwhile noting that as a result of colonisation through land confiscation, conversion of customary title, land sales, land grabs and the process to redress these impacts, some remnants of land that is in Māori ownership is often in isolated and fragmented locations such as hill country. Māori landowners often have limited opportunities to develop this land and return an economic benefit. Policy CC.6 (and others) could limit the ability of Māori landowners to use and develop this land. While in principle the Trust do not wish to see increased cover of exotic forestry plantation in hill country that is prone to erosion, the Trust seek that Regional Council acknowledge the ways in which policies such as this can be limiting for Māori to determine their rangatiratanga and work together with Māori landowners to realise an agreeable outcome.	Amended Method CC.4 that spatial plan to be prepared using a partnership approach	
Policy CC.7						
S23.70	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.7:	The Trust in principle supports Policy CC.7.	Support Noted	*Note – Method CC.6 replaces Policy CC.7* **Method CC.6: Identifying nature-based solutions to climate change** By 30 June 2024, the Wellington Regional Council will, in partnership with mana whenua / tangata whenua, identify ecosystems in the Wellington Region that should be prioritised for protection, enhancement, and restoration for their contribution as a nature-based solution to climate change, including those that: (a) sequester and/or store carbon (e.g., forest, peatland), (b) provide resilience to people and the built environment from the impacts of climate change (e.g., coastal dunelands, street trees, and wetlands), (c) provide resilience for indigenous biodiversity from the impacts of climate change, enabling ecosystems and species to persist or adapt (e.g., improving the health of a forest to allow it to better tolerate climate extremes). *Implementation: Wellington Regional Council*
S16.26	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.7:	Oppose: We consider the nature-based approach does not fall under sections 30 or 31 of the RMA as it goes beyond the maintenance of indigenous biodiversity. Decision requested: Delete these provisions entirely. Alternatively, amend the provisions to non-regulatory methods that are to be carried out by the Regional Council only.	Nature-based solutions provide significant opportunities to address climate change issues Retain	
S18.14	Waka Kotahi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.7:	Clarify if areas identified under Policy CC.7 and CC.8 become SNAs or something else with hierarchy in this RPS	No – will not be identified as SNAs	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
S17.43	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.7:	Agree	Support Noted	
S20.46	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.7:	Unclear as to how SWDC can meet CC1. Support for 'urban environments'. Focus should be on a 'Wellington region' outcome where the overall reductions in transport emissions are more likely to be achieved effectively and efficiently rather than a 'per district'. Otherwise, no new or 'amended' transport infrastructure could be provided which would prohibit growth. Relates to CC.6 above and is implemented by CC.8. Somewhat messy and clumsy drafting in the interplay between the three policies. As above, co-benefits supported as long as the impact on the rural community is proportionate to that on urban environments. Implementation methods are also a little opaque. Carbon farming is a sensitive issue for the community in the South Wairarapa.	CC.1 addressed elsewhere CC.6 and CC.8 redrafted for better clarity	
S14.038	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.7:	Decision requested: It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, itis not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this. The second point regarding Policy CC.6, CC.7 andCC.8, are the components that are related to District Plans. For Policy CC.7and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy. It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.	Planting trees is just one example of a Nature-based solution. Other provisions such as policies CC.7,.12, .14 and Methods CC.6 and .9 promote and support these Note that CC.6 is focused on regional councils. Consideration policy which applied to both region and districts has been deleted Method CC.6 – Regional council will lead this work in partnership with mana whenua. District councils expected to consider and manage impacts on sites that provide NbS	
S25.023	Wellington Water	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.7:	Decision requested: It would be helpful if this included enablement of new nature based solutions as well as identification	Other provisions support implementation of new NbS e.g. CC.14, FW.3.	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
Policy CC.8						
S12.034	Ngā Hapū o Ōtaki	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.8:	Decision requested: Policy CC.8: Protecting, restoring, and enhancing ecosystems and habitats **with** **mana whenua partners** that provide nature-based solutions to climate change - district and regional plans	Partnering with mana whenua added to Method CC.6which is to identify NbS, which will inform Policy CC.7	**Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change – district and regional plans** District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design. Explanation Development and infrastructure planning and design should include nature-based solutions as standard practice, including green infrastructure, green spaces, and environmentally friendly design elements, to manage issues such as improving water quality and natural hazard protection. Nature-based solutions can perform the roles of traditional infrastructure, while also building resilience to the impacts of climate change and providing benefits for indigenous biodiversity and community well-being.
S12.041	Ngā Hapū o Ōtaki	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.8:	Decision requested: Policy CC.8: Protecting, restoring, and enhancing ecosystems that provide nature- based solutions to climate change - district and regional plans District and regional plans shall include policies, rules and methods to *protect, restore,* and *enhance* ecosystems that provide *nature-based solutions* to climate change. Priority shall be given to actions that provide the greatest co-benefits for *climate change mitigation* and *adaptation*, indigenous biodiversity, fresh and coastal water. **Priority shall be given to nature-based actions that enable the inclusion of Te Ao Māori and mātauranga Māori with mana whenua.**	As above - Method CC.6 amended to recognize the importance of partnering with mana whenua to identify and protect NbS	
S16.27	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.8:	Oppose: More fundamentally, we are unaware of any evidence that the issue exists, or if it does, that a regulatory method would be the most appropriate method to address it when compared to other reasonably practicable methods available. We also note such an approach does not appear to be required by the Act or any higher level statutory planning document. The objective also identified that priority will given to solutions that provide multiple benefits for people and nature, but it is unclear how these benefits would be identified, measured and balanced against each other. The policies also do not appear to include measures that would support the objective. Decision requested: Delete these provisions entirely. Alternatively, amend the provisions to non-regulatory methods that are to be carried out by the Regional Council only.	Nature-based solutions are an important response to climate change mitigation and adaptation, recognizing the important interconnection between managing biodiversity, mitigating and adapting to climate change. Provisions amended for better clarity but retained.	
S23.71	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.8:	The Trust in principle supports Policy CC.8	Support Noted	
S19.29	Porirua City Council	4.1 Regulatory policies -	Policy CC.8:	What is a nature-based solution to climate change? Definition is vague - some examples would be good, along with guidance.	Improved definition and added examples	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		direction to district and regional plans and the Regional Land Transport Plan				
S20.47	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.8:	Relates to CC.6 above and is implemented by CC.8. Somewhat messy and clumsy drafting in the interplay between the three policies. As above, co-benefits supported as long as the impact on the rural community is proportionate to that on urban environments. Implementation methods are also a little opaque. Carbon farming is a sensitive issue for the community in the South Wairarapa.	Amended for better clarity	
S17.44	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.8:	Agree	Support Noted	
S14.039	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.8:	Decision requested: It is unclear whether the 'nature-based solutions' is just about identifying potential planting and forest areas in the region. A point that has been made in the earlier parts of this commentary, itis not clear that the term nature-based referring to, and the draft is misleading to sound like we would embrace and implement a whole raft of solutions. If the intention is about forest cover, the Policy should be upfront about this. The second point regarding Policy CC.6, CC.7 andCC.8, are the components that are related to District Plans. For Policy CC.7and CC.8, it is unclear how a regional council can direct a district plan to identify potential forest cover and ecosystems to be protected as this is a regional council mandate under the RMA hierarchy. It is encouraging to see policy intention of having more ecosystems in place to manage the impacts of climate change but is unclear how this Policy could realistically be achieved through District Plans. Asking District Plans to identify areas of ecosystems to be then planted and somehow ringfenced, other than the implementation of Section 6 related vegetation, is above their mandate.	As previous Planting trees is just one example of a Nature-based solution. Other provisions such as policies CC.7,.12, .14 and Methods CC.6 and .9 promote and support these Note that CC.6 is focused on regional councils. Consideration policy which applied to both region and districts has been deleted Method CC.6 – Regional council will lead this work in partnership with mana whenua. District councils expected to consider and manage impacts on sites that provide NbS	
S9.26	Hutt City Council	4.1 Regulatory policies - direction to district and	Policy CC.8:	Decision requested: It is unclear if this policy is intended to go beyond what is already required to protect indigenous biodiversity/SNAs. If it is intended to go further, this will be difficult to implement on private land	Amended to clarify the focus as responding to development/infrastructure rather than a SNA equivalent	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		regional plans and the Regional Land Transport Plan		given the issues that Councils are already experiencing with proposals to protect SNAs on private land.		
Policy CC.14						
S10.019	Wairarapa Iwi	4.2 Regulatory policies - matters to be considered	Policy CC.14:	Decision requested: Incorporate similar wording as Policy 52 [strong need for this policy as this is where a lot of damage has been done to natural environment. Need to ensure soft engineering is priorities Dover hard engineering (which should be a last resort). Need to reorder provisions to reflect that; Add reference to significant cultural sites and taonga species in policy 52(e)] and cross-reference to policy 52	Amended drafting to include avoidance and minimized effects	**Policy CC.12: Protecting, enhancing, and restoring ecosystems that provide nature-based solutions to climate change – consideration** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may adversely affect a nature-based solution to climate change and particular regard shall be given to avoiding effects on the climate change mitigation or adaptation functions. Explanation Nature-based solutions are critical components of the region's climate change response. This policy seeks to protect the functions that they provide to support climate change mitigation and/or mitigation.
S16.46	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy CC.14:	Oppose: Overall, we consider the suggested requirement for district plans to identify and require the protection, restoration and enhancement of ecosystems that provide nature-based solutions to climate change cannot be justified under section 32 of the RMA. Oppose: There is no statutory basis under the RMA or higher-level statutory planning documents to require particular regard be given to most of the matters raised by these draft policies when considering an application for resource consent, a notice of requirement, or a change to a district plan. Given the lack of a statutory basis for these matters, it is unclear how district plans could reasonably give particular regard to any of them in its decision making under the RMA. The only draft provision that city and district councils could reasonably have particular regard to when considering a resource consent or notice of requirements would be activities that fall under section 108(2)(c) of the Act as follows: (1) Except as expressly provided in this section and subject to section 108AA and any regulations, a resource consent may be granted on any condition that the consent authority considers appropriate, including any condition of a kind referred to in subsection (2). (2) A resource consent may include any 1 or more of the following conditions: (c) a condition requiring that services or works, including (but without limitation) the protection, planting, or replanting of any tree or other vegetation or the protection, restoration, or enhancement of any natural or physical resource, be provided: Decision requested: Delete these provisions entirely. Alternatively, amend the provisions to non-regulatory methods that are to be carried out by the Regional Council only.	Nature-based solutions are an important response to climate change mitigation and adaptation, recognizing the important interconnection between managing biodiversity, mitigating and adapting to climate change. Provisions amended for better clarity but retained.	
S19.47	Porirua City Council	4.2 Regulatory	Policy CC.14:	Unclear what type of resource consent applications this should be applied to.	Amended	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		policies - matters to be considered		What sort of weighting / consideration should be given, and to do what? Avoid, mitigate, reduce?		
S20.69	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy CC.14:	Perhaps a bit clumsy and unnecessary. Perhaps could be included in indigenous biodiversity provisions relating to loss of ecosystem services.	Broader than just indigenous ecosystems Amended for better clarity	
S23.97	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy CC.14:	The Trust supports Policy CC.14.	Support noted	
	Wairarapa iwi		Policy CC.14	Incorporate similar wording as Policy 52 [strong need for this policy as this is where a lot of damage has been done to natural environment. Need to ensure soft engineering is priorities Dover hard engineering (which should be a last resort). Need to reorder provisions to reflect that; Add reference to significant cultural sites and taonga species in policy 52(e)] and cross-reference to policy 52	Amendments made to refer to avoid or minimise impacts. Mana whenua to partner with GW in identifying NbS in Method CC.6	
Policy CC.16						
S16.48	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy CC.16:	Oppose: There is no statutory basis under the RMA or higher-level statutory planning documents to require particular regard be given to most of the matters raised by these draft policies when considering an application for resource consent, a notice of requirement, or a change to a district plan. Given the lack of a statutory basis for these matters, it is unclear how district plans could reasonably give particular regard to any of them in its decision making under the RMA. The only draft provision that city and district councils could reasonably have particular regard to when considering a resource consent or notice of requirements would be activities that fall under section 108(2)(c) of the Act as follows: (1) Except as expressly provided in this section and subject to section 108AA and any regulations, a resource consent may be granted on any condition that the consent authority considers appropriate, including any condition of a kind referred to in subsection (2). (2) A resource consent may include any 1 or more of the following conditions: (c) a condition requiring that services or works, including (but without limitation) the protection, planting, or replanting of any tree or other vegetation or the protection, restoration, or enhancement of any natural or physical resource, be provided:	Consideration policy deleted and replaced with a non-reg policy – as noted by PCC - Unclear what type of resource consent applications this should be applied to	**Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" – non-regulatory** Promote and support the planting and natural regeneration of forest to maximise the benefits for carbon sequestration, indigenous biodiversity, erosion control, freshwater and coastal ecosystems, and the social and economic well-being of local communities. Priority should be given to promoting and incentivising the planting and regeneration of permanent indigenous forest in preference to exotic species, particularly on *highly erodible land* and in catchments where water quality targets for sediment are not reached Explanation Policy CC.18 promotes the planting of trees to contribute to achieving net zero emissions by 2050 while seeking an increase in forest extent that maximises the co-benefits for indigenous biodiversity, land stability, aquatic ecosystem health, and social and economic well-being, as directed by Objective CC.5.
S17.58	Masterton District Council	4.2 Regulatory policies - matters to	Policy CC.16:	Is each district responsible for increasing their own area of permanent forest? The Wairarapa should not have to compensate for the greater Wellington region	Consideration policy deleted and replaced with a non-reg policy – as noted by PCC - Unclear what type of resource consent applications this should be applied to	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		be considered				
S19.49	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy CC.16:	Unclear what type of resource consent applications this should be applied to. Further, (c) is inconsistent and contrary to the NES-PF which regulates this activity. There are numerous plantation forestry activities addressed by the NES-PF including activities such as afforestation, pruning and thinning, harvesting and replanting. These have activity statuses ranging from permitted to restricted discretionary. Under the NES-PF, there are limited circumstances in which plans can be more stringent than the NES. "Avoid" suggests either a non-complying or prohibited activity status. Which plantation forestry activities does this policy seek to avoid, and is there scope to be more stringent?	Consideration policy deleted and replaced with a non-reg policy – as noted by PCC - Unclear what type of resource consent applications this should be applied to	
S20.71	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy CC.16:	Support increasing permanent vegetative cover on highly erosion prone land and realising co-benefits for water quality and indigenous biodiversity. As noted, setting afforestation targets should be done in conjunction with the communities they affect and be proportionate. Additional afforestation outside of catchments with erosion and water quality issues should be secondary to those for the high risk areas and considered (as an offset) after reduction requirements. As above in CC.6, see to include a preclusion for highly productive land.	Consideration policy deleted and replaced with a non-reg policy – as noted by PCC - Unclear what type of resource consent applications this should be applied to Detail to be developed through Regional spatial forest plan, prepared in partnership with key parties	
S23.99	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy CC.16:	The Trust supports in part Policy CC.16. The Trust are support the intent of policy that provides for the planting permanent forest in highly erosion prone land (provided that it is the right tree in the right place). The Trust acknowledge the environmental benefits that occur as a result. However, the Trust have expressed that Regional Council should work closely with Māori landowners who have interests in plantation forestry on highly erosion-prone land.	Consideration policy deleted and replaced with a non-reg policy – as noted by PCC - Unclear what type of resource consent applications this should be applied to Right tree right place provided by Policy CC.18	
S23.109	Ātiawa ki Whakarongotai Charitable Trust	4.4 Non-regulatory policies	Policy CC.18:	The Trust supports in part Policy CC.18. The Trust seeks that mana whenua work closely with Regional Council to identify ways to partner to achieve co-benefits for mana whenua and to provide for mana whenua values. The Trust questions what adverse impacts on social well-being are created from increasing regional forest cover. It could equally be argued that increased forest cover and the co-benefits (i.e. increased indigenous biodiversity, improved water quality/ability to interact with the water, greenspaces) created from this could have benefit for social well-being, including addressing social anxiety around lack of climate action. The Trust requests Regional Council reconsider the final sentence of this policy.	Policy acknowledges many benefits of tree planting but also recognises that unfettered planting of exotic trees across productive farmland will have social and economic effects. A more strategic approach is to identify critical areas where more trees have multiple benefits and work towards that outcome together with mana whenua and the wider community as in Method CC.4 prepare a regional forest spatial plan	
S20.77	South Wairarapa District Council	4.4 Non-regulatory policies	Policy CC.18:	Qualified support for the enabling and supporting of increased vegetation cover, subject to the comments on CC.17. Not sure last part is able to be met, an economic assessment required to set the optimum level. We need to understand how it fits into net zero for the region.	Support noted	
Method CC.4						
S12.052	Ngā Hapū o Ōtaki	4.5.3 Non-regulatory methods -	Method CC.4:	Decision requested: Prepare a regional forest spatial plan to identify where to promote and support forest planting/ natural regeneration to	Intent of increased benefits for indigenous biodiversity and freshwater set out in Objective	**Method CC.4: Prepare a regional forest spatial plan** <u>Using a partnership approach, identify where to promote and support planting and natural regeneration of forest, including how to address</u>

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
		integrating management		achieve the best outcomes for carbon sequestration, with co-benefits for reducing erosion, **increasing** indigenous biodiversity**, and enhancing** fresh and coastal water, while taking into account the impacts on rural production and social well-being. This plan to include identification of: (a) the extent of current forest cover, with a process to monitor changes in extent; (b) a target for an increase in forest extent in the Wellington region to support achieving net-zero greenhouse gas emissions by 2050; (c) *highly erosion-prone land* where *plantation forestry* is inappropriate and that would benefit from being returned to permanent **indigenous** forest;		water quality targets for sediment, to inform the requirements of Policy CC.6. *Implementation: Wellington Regional Council* and city and district councils*
S17.62	Masterton District Council	4.5.3 Non-regulatory methods - integrating management	Method CC.4:	Decision requested: Masterton District Council to be one of the organisations involved with preparing this plan	Added using 'a partnership approach' to method CC.4 which would include district councils	
S10.027	Wairarapa Iwi	4.5.3 Non-regulatory methods - integrating management	Method CC.4:	Decision requested: Add date for this spatial plan; in place by 2023. Need to provide incentives. Also need to monitor plan effectiveness and efficiency for implementation.	Date added	
S20.86	South Wairarapa District Council	4.5.3 Non-regulatory methods - integrating management	Method CC.4:	We have provided extensive comments on this area. The development of Regional Forest Plans needs to be collaborative, proportionate and equitable to the communities that bear their social, cultural and economic cost. As noted above any regional afforestation spatial plan needs to include community and TA's in plan development and must include consideration of the maintenance of the vibrance and vitality of rural communities and regional equity.	Added using 'a partnership approach' to method CC.4, which would include district councils	
Method CC.7						
S10.028	Wairarapa Iwi	4.5.4 Non-regulatory methods - identification and investigation	Method CC.7:	Decision requested: · Method CC.7 should also include link to Tangata Whenua/Mana Whenua as well. Identifying values isn't enough - need next step	Partnership added with mana whenua to Methods CC.7 and CC.8	**Method CC.6: Identifying nature-based solutions to climate change** By 30 June 2024, the Wellington Regional Council will, in partnership with mana whenua, identify ecosystems in the Wellington Region that should be prioritised for protection, enhancement, and restoration for their contribution as a *nature-based solution* to climate change, including those that: (a) sequester and/or store carbon (e.g., forest, peatland), (b) provide resilience to people and the built environment from the impacts of climate change (e.g., coastal dunelands, street trees, and wetlands), (c) provide resilience for indigenous biodiversity from the impacts of climate change, enabling ecosystems and species to persist or adapt (e.g., improving the health of a forest to allow it to better tolerate climate extremes). *Implementation: Wellington Regional Council*
S23.126	Ātiawa ki Whakarongotai Charitable Trust	4.5.4 Non-regulatory methods - identification and investigation	Method CC.7:	The Trust seeks a partnership approach with mana whenua be applied to Method CC.7. The Trust would like the words "and seek resourcing to secure this" be deleted. While the Trust are keen work in partnership to identify ecosystems and habitats under this method, the Trust do not think it is appropriate for mana whenua to have responsibility to seek resourcing when we don't have the capacity/resourcing to meet such a responsibility. Decision requested: Method CC.7: Identifying nature-based solutions for climate change By 30 June 2023, **partner with mana whenua to** identify ecosystems and habitats that will make a significant contribution	Partnership added with mana whenua to Methods CC.6 and CC.9 – but not for resourcing	

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
				to climate change mitigation and/or adaptation in the Wellington Region, including identifying those that should be prioritised for protection, restoration, or enhancement ~~and seek resourcing to secure this.~~ Link these priorities to the indigenous biodiversity targets and priorities identified by Method IE.2.		
S20.94	South Wairarapa District Council	4.5.4 Non-regulatory methods - identification and investigation	Method CC.7:	Support identifying nature based solutions for climate change.	Support noted	
Method CC.8						
S12.009	Ngā Hapū o Ōtaki	4.5.5 Non-regulatory methods - providing support	Method CC.8:	Decision requested: Method CC.8: New programme **with mana whenua partners** to protect and/or restore indigenous biodiversity and climate change mitigation/adaptation	Added partnership with mana whenua	**Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions** Provide support, and seek new sources of funding, for programmers that protect, enhance or restore the priority ecosystems identified by Methods IE.2 and CC.7 for their biodiversity values and/or their contribution as nature-based solutions to climate change. *Implementation: Wellington Regional Council*
S12.054	Ngā Hapū o Ōtaki	4.5.5 Non-regulatory methods - providing support	Method CC.8:	Decision requested: Method CC.8: New programme **with mana whenua partners** to protect and/or restore priority indigenous biodiversity and/or support climate change mitigation/adaptation Establish a programme to initiate and provide new funding to **mana whenua partners to lead integrated interdisciplinary community projects that** achieve the *maintenance* and/or *restoration* of priority indigenous ecosystems and habitats for their biodiversity **and cultural** values and/or their contribution to *climate change mitigation* or *adaptation*, as identified by Policies IE.4 orCC.7.	Added partnership with mana whenua	
S20.95	South Wairarapa District Council	4.5.5 Non-regulatory methods - providing support	Method CC.8:	support identifying funding streams for maintenance, restoration of priority ecosystems.	Support noted	
S10.029	Wairarapa Iwi	4.5.5 Non-regulatory methods - providing support	Method CC.8:	Decision requested: · Method CC.8 Should include developing programme "led by Tangata Whenua"	Added in partnership with mana whenua – leadership for different aspects of the work can be determined as part of the programme	
Definitions						
S9.37	Hutt City Council	Appendix 3: Definitions	Nature-based solutions	Neither of the two definitions offered here are sufficiently certain or clear enough to be used as definitions in an RMA planning context. Decision requested: Amend the definition to provide more certainty and draft in line with best practice definitions drafting.	Revised the definition for Nature-based solutions to include examples to assist understanding of this relatively new term.	**Definition for Nature-based solutions** Actions to protect, enhance, or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce greenhouse gas emissions and/or strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects of climate change. Examples include: Reducing greenhouse gas emissions (climate change mitigation): • planting forests to sequester carbon • protecting peatland to retain carbon stores Increasing resilience (climate change adaptation): (a) providing resilience for people • planting street trees to provide relief from high temperatures

Submission Point	Submitter	Section	Provision	Feedback for provisions	Response	New draft provisions drafted from original RPS
						• <u>restoring coastal dunelands to provide increased resilience to the damaging effects of storms linked to sea level rise</u> • <u>leaving space for rivers to undertake their natural movement and accommodate increased floodwaters,</u> • <u>the use of rain gardens to reduce stormwater runoff in urban areas</u> (b) <u>providing resilience for ecosystems and species</u> • <u>restoring indigenous forest to a healthy state to increase its resilience to increased climate extremes</u> • <u>leaving space for estuarine ecosystems, such as salt marshes, to retreat inland in response to sea level rise.</u>

Climate change – transport

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
General						
S18.022	Waka Kotahi	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement		Decision requested: Climate change - in general we are supportive of the climate change policies in the draft. Suggested wording has been added to strengthen transport integration. We would like to discuss CC.1 further to understand the implications of this policy on future new and altered road infrastructure. We are keen to understand the interplay of the RMA and policies CC.10 and CC.12 which will both require GHG emissions to be considered in consent/NOR applications. When would these changes come into effect and do they require the changes proposed in the RM Amendment Act to have come into force? We have previously discussed carbon emissions assessment and we will be able to provide more detailed feedback on this soon.	Noted	
S11.005	Kāinga Ora	3.9 Regional form, design and function		1. However, Kainga Ora seeks that consideration is made for equality of access to public transport for all, across the region where demand for public transport will likely increase or be required (i.e., new network connections) due to the anticipated residential growth and development that will occur across the region.	Noted. Intent of policies is to ensure equality and accessibility to public transport.	
Policy 9						
S23.42	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 9:	The Trust supports the amendments to Policy 9.	Noted	**Policy 9: <u>Promoting greenhouse gas emission reduction and uptake of low emission fuels</u> – Regional Land Transport <u>Plan</u> ~~Strategy~~ ~~Reducing the use and consumption of non-renewable transport fuels, and carbon dioxide emissions from transportation~~** The Wellington Regional Land Transport <u>Plan</u> ~~Strategy~~ shall include objectives and policies that promote ~~a reduction in~~: ~~(a)~~ <u>reduction of</u> the consumption of non-renewable transport fuels; and ~~(b) the emission of carbon dioxide from transportation~~ (b) <u>reduction of the emission of greenhouse gases, and other transport-generated harmful emissions such as nitrogen dioxide; and</u>
S20.23	South Wairarapa	4.1 Regulatory policies -	Policy 9:	Support RLTP focus on reducing the use non-renewable fuel and emissions of greenhouse gasses and active modes infrastructure/public transport for 'urban environments'.	Noted	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
	District Council	direction to district and regional plans and the Regional Land Transport Plan		Support the promoting small scale and community scale distributed electricity generation. This will be included in the draft Combined Wairarapa District Plan.		(c) <u>the uptake of low emission or zero carbon fuels, biofuels and new technologies.</u> ~~including through prioritising public and active transport investment to serve future urban areas, to enable development in a sequential manner which minimises the risk of increasing car journeys in the region~~ Explanation <u>This policy promotes a reduction in emissions to decarbonise the transport system, promotes the uptake of low emission or zero carbon fuels and new technologies. Regionally, in 2019, transport was the biggest source of greenhouse gas emissions. Transport emissions accounted for 39 percent of total gross emissions.</u>
S17.18	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 9:	Agree in principle - but how will this work for Tier 3 Councils? Please clarify. Decision requested: Further clarity sought on how this will impact Tier 3 councils	Noted	
S24.017	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 9:	Overlap (Recognising the benefits from renewable energy and regionally significant infrastructure - regional and district plans) and (Reducing the use and consumption of non-renewable transport fuels, and greenhouse gas emissions from transportation - Regional Land Transport Plan) Decision requested: Use and consumption are more or less the same term	Policy 9 added *(d) uptake of low emission or zero carbon fuels, biofuels and new technologies.* 'Hydrogen' covered in 'low emissions' and 'new technologies', if included could have commercial implications. Policy amended to improve clarity	
S24.016	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 9:	There are no or limited provisions to support the production and use of bio-fuels and hydrogen fuels. Decision requested: Policy 7, Policy 9 and Policy 39 need to have provisions for an increased uptake of green fuels (biofuels and hydrogen fuels). This is because these fuels are keys for reducing emissions from the freight, aviation, and maritime transport sector. National Emissions Reduction Plan (ERP) has also highlighted the importance of these green fuels as other low and zero carbon alternatives for these sectors are not mature enough to deploy in large scale to reduce emissions. Please see "Action 10.3.1"; "Action 10.3.3"; and "Action 10.3.4" in the national Emissions Reduction Plan here: https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf.	'Biofuels and new technologies' included in the revised Policy 9.	
S24.037	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land	Policy 9:	Decision requested: Policy 7, Policy 9 and Policy 39 need to have provisions for an increased uptake of green fuels (biofuels and hydrogen fuels). This is because these fuels are keys for reducing emissions from the freight, aviation, and maritime transport sector. National Emissions Reduction Plan (ERP) has also highlighted the importance of these green fuels as other low and zero carbon alternatives for these sectors are not mature enough to deploy in large scale to reduce emissions. Please see "Action 10.3.1";	Policy 9 included 'Biofuels and new technologies'. 'Hydrogen' not included due to commercial implications.	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
		Transport Plan		"Action 10.3.3"; and "Action 10.3.4" in the national Emissions Reduction Plan here: https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf.		
S14.018	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 9:	Decision requested: The preparation of another plan (Regional Land Transport Plan) to give effect to Policy 9 dilutes the policy intent. It is unclear that as a higher order document, the RPS will be reconciled with a lower order document (Regional Land Transport Plan), which may not be binding, producing policies to give effect to policy 9. The wording also 'promotes reduction', it is more cost-effective to reduce than promote, and why promote while we can be more directive to 'reduce'.	The RLTP cannot 'require' and the RPS can only direct the RLTP to 'advocate', 'promote' or 'support'. Eg. the RLTP can have a policy that advocates but GW are not responsible for delivering. MoT is responsible.	
Policy EIW.1						
S11.008	Kāinga Ora	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy EIW.1:	Kāinga Ora supports this policy but would like additional wording to be included to require the incorporation of equality in accessible transportation options, that provide public transport options for lower income neighbourhoods to service those most in need. Decision requested: The Wellington Regional Land Transport Plan shall include objectives, policies and methods that prioritise affordable, **equitable** and accessible high quality active mode and car share infrastructure and public transport services with sufficient frequency and connectedness, ***f*or all, across the region where demand for public transport will likely increase or be required (i.e., new network connections) due to the anticipated residential growth and development.**	Feedback reflected in part. Added 'equitable' but have not added the other suggestion. However, made a change from 'urban environments' to 'urban areas'. That hopefully captures all of the region instead of just the 'urban environments'. Also, some of the urban and transport planning integration policies will address the feedback to some extent.	**Policy EIW.1: Promoting affordable high quality active mode and public transport services – Regional Land Transport Plan** The Wellington Regional Land Transport Plan shall include objectives, policies and methods that promote equitable and accessible high quality active mode infrastructure, and affordable public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban areas without the need to have access to a private vehicle, by contributing to reducing greenhouse emissions. Explanation This policy provides direction to the Regional Land Transport Plan, acknowledging the role of objects and policies in that plan, to promote mode shift from private vehicles to public transport and active modes by providing connected, accessible, affordable and extensive multi modal infrastructure and services.
S23.43	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy EIW.1:	The Trust in principle supports Policy EIW.1. The Trust recognises the impacts of the transport industry on climate change. The Trust seeks that Regional Council actively work with a range of people who reflect all capabilities, abilities, and minorities to develop the Regional Land Transport Plan.	Noted.	
S18.6	Waka Kotahi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy EIW.1:	Include 'infrastructure' after active mode to clarify statement. Decision requested: Amend Policy EIW.1 to read: The Wellington Regional Land Transport Plan shall include objectives, policies and methods that prioritise affordable and accessible high quality active mode infrastructure, and car share infrastructure, and public transport services with sufficient frequency and connectedness, including between modes, for people to live in urban environments without the need to own a private vehicle.	Added 'Infrastructure'.	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
S20.24	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy EIW.1:	Support RLTP focus on reducing the use non-renewable fuel and emissions of greenhouse gasses and active modes infrastructure/public transport for 'urban environments'.	Noted	
S17.19	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy EIW.1:	Agree in principle - but how will this work for Tier 3 Councils? Please clarify. Decision requested: Further clarity sought on how this will impact Tier 3 councils	Noted	
S14.019	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy EIW.1:	Decision requested: The intent of the policy is supported - however we are conscious a variety of infrastructure is needed to be present to align, to make this happen. The intent of the policy is supported – however we are conscious a variety of infrastructure is needed to be present to align, to make this happen. *Without needing to own a private vehicle* is a significant statement, where for affordable high quality active mode and carshare infrastructure, and public transport services may not be available for our communities. We need to ensure that the policy intention is not disadvantaging our communities. This might be reworded to say: *Regional Land Transport Plan should provide detail frameworks how this can be implemented with iwi partners and ensure a detailed co-design is worked with Tangata Whenua.*	Not reflected. RLTPs are directed by the Regional Transport Committee which is established under s105 of the LTMA. There are minimum requirements in the LTMA s18G. The committee comprise GWRC and district councils elected members, and KiwiRail and Waka Kotahi. The Regional Transport section the GWRC would like to use a separate process, and guided by Te Hunga Whiriwhiri for working with mana whenua.	
S24.018	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy EIW.1:	The adjectives in this policy are unclear what they refer to. Some, like "affordable", presumably relate to the cost of travel. Others, like "high quality" presumably refer to the infrastructure. Decision requested: Reword so the adjectives are about the infrastructure, and remove the affordable component.	Amended, hopefully improved clarity.	
Policy 10						
					Transport team: Recommend that **Policy 10 be removed** as the operative requirement is now covered in other policies and replaced by ERP direction and Policy CC.2.	**Delete Policy 10** ~~Policy 10: Promoting travel demand management – district plans and the Regional Land Transport Strategy~~ ~~District plans and the Wellington Regional Land Transport Strategy shall include policies to promote travel demand management mechanisms that reduce:~~
S23.44	Ātiawa ki Whakarongot	4.1 Regulatory policies -	Policy 10:	The Trust supports in principle the amendments to Policy 10. The Trust recognise the impacts of the transport industry on climate change. The Trust seeks that Regional Council actively work with		

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
	ai Charitable Trust	direction to district and regional plans and the Regional Land Transport Plan		a range of people who reflect all capabilities, abilities, and minorities to develop the Regional Land Transport Plan.		~~(a) the use and consumption of non-renewable transport fuels; and (b) carbon dioxide emissions from transportation.~~
S17.20	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 10:	Agree in principle - but how will this work for Tier 3 Councils? Please clarify. Decision requested: Further clarity sought on how this will impact Tier 3 councils	Policy 10 was existing policy. Now deleted on advice of the GW transport team. See comment above.	
S14.020	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 10:	Decision requested: Detailed travel demand management plans would help us make aligned decisions while land use is being planned. The production of a travel demand management plan will be time and resource intensive. It is unclear, undertaking such exercise, just to 'promote' the reduction of using non-renewables and GHG emissions justifies the time and resource required to complete these plans. It is unclear whether they are secondary decision-making documents; should they be prepared to produce evidence for our reductions, or because they offer opportunity to change the way land is used, should they be directive rather than promotional and optional.	Policy 10 was existing policy. Now deleted on advice of the GW transport team. See comment above.	
Policy CC.1						
S23.64	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.1:	The Trust has an interest in this Policy. In principle the Trust supports the intent of Policy CC.1 to reduce carbon emissions generated by transport. The Trust wants to ensure that maximising modal shift from private vehicles to public transport or active modes does not exacerbate existing inequalities. That is, ensuring accessibility for all capabilities - those who cannot easily walk or cycle, ensuring equity for Māori, and those with care-giving responsibilities. For example, it is reported that low-income people in some areas consider it essential to own a car, because they have no other way to do what they need to get done in their lives. Work and other activities are not close enough to walk to; the cycling networks are not safe enough; and public transport is neither frequent nor direct for people who do not work in the central city and live close to train lines or rapid bus routes.	Policy 'equity and incisiveness', as well as addition of 'equity' in policy EIW.1 should in part mitigate some of the concern of the Trust. There are also other policies with intent to enable, connected, affordable, safe, frequent transport.	**Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure – district and regional plans** Regional and district plans shall include objectives, policies, rules and/or methods to require that all new and altered transport infrastructure is designed, constructed, and operated in a way that contribute to reducing greenhouse gas emissions by: (a) Optimising overall transport demand; (b) Maximising mode shift from private vehicles to public transport or active modes; and (c) Supporting the move towards low and zero-carbon modes. Explanation This policy requires transport infrastructure (including design, construction and operation) to consider and choose solutions that will contribute to reducing greenhouse gas emissions.
S17.38	Masterton District Council	4.1 Regulatory policies - direction to district and regional	Policy CC.1:	Agree in principle - being looked at in WCDP review. Decision requested: More clarity on if the targets are the same for Tier 3 councils	Policy redrafted – separating the policy from the targets. Targets to be included in the objective. The targets are set as 'contributing to' the regional targets. Each district council will need to show how they contribute towards the regional target thorough their objectives, policies and rules ie. when developing their	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
		plans and the Regional Land Transport Plan			objectives, policies and rules how that contributes to the overall targets.	
S18.11	Waka Kotahi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.1:	Support this wording, revise 'overall transport demand' to private vehicle travel demand or similar as we do not want to include public transport or active modes here Decision requested: Regional and district plans shall include objectives, policies, rules and/or methods to ensure that all new and altered transport infrastructure is designed, constructed and operated to minimise overall transport private vehicle travel demand, maximise mode shift from private vehicles to public transport or active modes, and support the move towards low and zero-carbon modes, contributing to achieving a:...	Not included. Request was to not to use 'overall transport' but to focus on 'minimize private vehicle travel demand'. The intent of this policy is to capture all of the transport infrastructure and it is intending to reflect the 'avoid, shift, improve framework'. It is broader than just minimising mode shift from private vehicle travel demand. All of the modes (incl their design, construction and operation) need to contribute towards the targets. Not just shift away from private vehicles.	
S19.23	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.1:	This is broader than an RMA planning matter and in some cases outside the direct control of territorial authorities, such as funding and operation of public transport. Design of these projects is driven by a capital investment approach and other regulatory instruments including RLTP, LTPs, and business cases. Further, how will these be measured and by whom? These three clauses should be in an objective (what is sought to be achieved) rather than in a policy (the means to get there). Typo "20218 levels".	Separating the policy from the targets. Targets to move into the objective.	
S16.22	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.1:	It is unclear to us what the policy would expect city and district councils to do through their district plans. Considering city and district councils have no responsibilities for discharges to air, and regional councils are responsible for public transport services, we find the policy confusing and without a legislative basis on which to base it on. We also note the suggested targets are greater than the targets set by the Government for domestic greenhouse gas emissions, and we are therefore wondering what the justification and evidence base for the draft targets is. Decision requested: Delete Policy CC.1. or apply it only to regional councils.	~~It is expected that TAs are considering this policy and how what is in their remit contributes to achieving the targets in the objective. Any infrastructure and its operation has implications for GHG emissions such as embodied carbon~~. Policy CC.1 has been redrafted as targets have been moved to the objective. This policy remains directive on district plan and seeks controls on land use needed to support greenhouse gas emission reductions. It is specifically targeted at the land use and transport aspects that affect climate change which are the responsibility of territorial authorities under the RMA. District plans traditionally contain objectives, policies and rules which encourage and support a focus on road related transport infrastructure (new roads are enabled, existing roads are protected, etc). Traditionally, land use controls seek to avoid traffic generating activities that cannot occur without delays. Plans also traditionally require parking. All of these promote car centred urban environments which do not support climate change objectives. Territorial authorities are the RMA decision maker for land use activities that shape cities and the way in which people are required to travel. Territorial authorities are also the recommending authority for new	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
					transport infrastructure when designations for new transport infrastructure are proposed (e.g. new roads). All of these provide an opportunity to support climate change through revising District Plans to better support climate change. E.g. District plan provisions which could assist, and are within the statutory jurisdiction of territorial authorities, might include: policies and rules which do not allow new traffic generators to establish where not served by public transport or active transport modes; policies and rules which discourage new roading investment where it will induce additional travel by private vehicle, policies to require active mode facilities, etc.	
S24.024	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.1:	Alignment with the National Emissions Reduction Plan (ERP) Decision requested: Emissions reduction targets outlined in "Policy CC.1: Transport infrastructure - district and regional plans" could be aligned to the national ERP. Please see page 172 in the ERP here: https://environment.govt.nz/assets/publications/Ao... "contributing to achieving a minimum:"	Not incorporated 'achieving a minimum'. The transport targets as they are already more ambitious then the national targets.	
S9.24	Hutt City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.1:	Unclear how the design, construction and operation of transport infrastructure minimises overall transport demand. The focus should be on mode shift, and minimising private vehicle use rather than transport use as a whole, as the second part of the policy does. Clauses (a)-(c) do not appear to add much value here as these are overall targets. It will be very hard to determine how an individual development/infrastructure project contributes to the overall reduction. As the wording is 'contributing to' it is clear that these targets are overarching targets for the region. As such they are of a more strategic nature and should be in a relevant strategic document and then referenced in introductory or explanatory material within the RPS. Decision requested: Clarify what is meant by 'minimise overall transport demand' in relation to the design, construction and operation of transport infrastructure. Delete clauses (a)-(c).	Targets moved mover to the objective. Changed 'minimize' to 'optimize' overall transport demand.	
S8.006	Carterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.1:	Decision requested: Support SWDC's comments here. It is easier in urban areas to meet these reduction targets and harder in the Wairarapa. We need clarity around how these will apply in the Wairarapa. If you want targeted % reductions in emissions, perhaps take a catchment-based approach to reductions.	The targets are set as 'contributing to' the regional targets. Each district council will need to show how they contribute towards the regional target thorough their objectives, policies and rules ie. when developing their objectives, policies and rules how that contributes to the overall targets.	
Policy CC.2						
S23.65	Ātiawa ki Whakarongot	4.1 Regulatory	Policy CC.2:	In principle the Trust supports Policy CC.2.	Noted	**Policy CC.2: Travel demand management plans – district plans**

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
	ai Charitable Trust	policies - direction to district and regional plans and the Regional Land Transport Plan				By 30 June 2025, district plans shall include objectives, policies and rules that require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions. Explanation Location suitable development thresholds triggering a consent requirement for a travel demand management plan are to be developed by territorial authorities and should apply to residential, education, office, industrial, community, entertainment and other land use activities that could generate private vehicle trips and freight travel. Development thresholds should specify the trigger level (e.g., number of dwellings, number of people accommodated or gross floor area) where the travel demand management plan requirement applies. **Definition:** A **travel demand management plan** sets out interventions and actions to influence travel behaviour, with the aim of minimising travel demand or redistributing demand from traditional car usage to more sustainable transport modes for new subdivision, use and development. A travel demand management plan should include mitigation measures that ensure planned subdivision, use and development is designed and implemented to maximise quality of life for people without access to a private vehicle, reducing the demand for vehicle trips and associated externalities like greenhouse gas emissions. For example, a travel demand management plan for a new retail development might promote cycle parking facilities and a delivery service, as an intervention to promote travel with low carbon emissions.
S16.23	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.2:	Oppose: We strongly oppose this policy and consider a non-regulatory method appropriate for encouragement of the desired outcomes. We consider it inappropriate to require city and district councils to develop threshold targets. Traffic volumes and decisions by individuals on whether or not to use a private vehicle, buy an electric vehicle, or use public transport are not matters that can be addressed or required via regulatory methods in a district plan. Council already requires transport assessments on developments where it is considered to be appropriate, and this often includes travel plans to address transport effects where specific transport concerns are identified. We also strongly oppose the suggested requirement for a formal plan change to give effect to this policy by June 2025. We recommend deleting policy or amending it to provide for non-regulatory methods to encourage the desired changes in travel mode. Decision requested: Delete policy CC.2 or amend it to require non-regulatory methods that will be explored by Greater Wellington Regional Council and city and district councils in partnership.	The policy is asking councils to prescribe a threshold suitable for their situation requiring when consent applicants need to prepare a TDMP. The definition wording has been amended to make this clear. Threshold targets for travel demand management plans are an appropriate RMA tool to manage land use /transport effects and integration and is a clear function of territorial authorities under the RMA.	
S17.39	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.2:	Note that we want to align this work with actions in our MSTN District Climate Change Action Plan	Noted	
S18.12	Waka Kotahi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.2:	Support, include wording to reflect additional benefits of travel demand management such as urban form and transport efficiency Decision requested: By 30 June 2025, district plans shall include objectives, policies and rules that require provision of travel demand management plans to minimise reliance on private vehicles and maximise urban form and use of public transport and active modes for all new subdivision, use and development over a development threshold where there is a potential for a more than minor	Not included the proposed concepts. The efficiency is implied, and the urban form is addressed in the other UD provisions that relate to urban development and transport integration.	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions.		
S19.24	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.2:	Policy needs to guide what particular development threshold this applies to? How do we determine if there is a potential for more than a minor increase? What are travel demand management plans? Need a definition and guidance.	The policy directs districts to develop the thresholds. Districts are best placed to make those decisions.	
S20.41	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.2:	Requirement travel demand development plans to reduce private transport and maximise public transport - Unclear as to the value gained for SWDC's contribution towards reducing carbon and greenhouse gas emissions in the region. The three towns are largely 'walkable'. For those towns improved cycle facilities may provide some benefit.	Included an example of a type of intervention suitable for the South Wairarapa district.	
S14.035	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.2:	Decision requested: The policy intent of asking territorial authorities to prepare travel demand management plans is unclear. What does preparing travel demand management plans look like and whether this distracts the local authorities to execute zero carbon policies? Because producing such plans will take time, resources and requires robust evidence. It is unclear also whether producing these plans will bear any additional costs to communities and whether this can be done in a more efficient way through a resource consent application. It is unclear, the word 'minimising' in the policy refers to District Plan minimising the reliance on private vehicles, or developers are required to prepare travel management plans so that they can provide a plan on how their development promotes and enables a zero carbon travel framework.	Hopefully attempt at making the policy clearer who is being asked to develop a TDMP and who is being asked to develop the thresholds resolves this concern.	
S9.25	Hutt City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.2:	This is too prescriptive and does not need regional consistency, particularly for small and medium developments. Each territorial authority can decide how to manage demand. Decision requested: Delete policy	Policy not deleted. The policy has been deliberately drafted such that territorial authorities can determine thresholds to apply travel demand management plan rules. It doesn't prescribe regional consistency, rather, that a bespoke and locally suitable policy and methods (ideally rules) is included in each district plan in the region.	
Policy CC.4						
S23.67	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to	Policy CC.4:	The Trust supports Policy CC.4.	Noted	**Policy CC.3: Enabling a shift to low and zero-carbon emission transport – district plans** By 30 June 2025, district plans shall include objectives, policies, rules and methods that enable infrastructure that supports the uptake of zero and

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
		district and regional plans and the Regional Land Transport Plan				low-carbon multi modal transport that contribute to reducing greenhouse gas emissions. Explanation District plans must provide a supportive planning framework (e.g., permitted activity status) for zero and low-carbon multi modal transport infrastructure, such as public transport infrastructure, cycleways and public EV charging network.
S16.25	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.4:	Oppose: A recurring theme in the Draft RPS Change 1 is the focus on regulatory methods in the absence of demonstrated legislative support or evidence that a non- regulatory method would not be more appropriate. We do not consider a district plan (or a RPS for that matter) to be the most efficient or effective method to achieve the intent of this policy. We also note the policy appears to overlook the fact it is unlawful for district plans to include provisions that have the effect of requiring a minimum number of car parks (unless they are accessible car parks). This prohibition would extend to requiring specific electric vehicle charging spaces. District plans cannot not include rules or standards that manage or require the installation of EV charging stations. EV charging stations generally require at least one car park associated with them, and district plans cannot lawfully include provisions that have the effect of requiring a minimum number of car parks be provided. If EV charging stations fall within private property, they are at the discretion of the landowner. If they are within public land they are at the discretion of the Council as asset owner. We recommend Greater Wellington Regional Council consider the use of incentives rather than attempting to force regulation via district plans to achieve the aims of the policy and relevant objective. Decision requested: Delete Policy CC.4 and consider other methods to achieve the desired outcomes.	As highlighted by KCDC, the NPS-UD prevents councils requiring minimum car parks on land use development (E.g. new residential units), so you couldn't require an EV car park for a land use development. However, with this policy the intent was about avoiding consent requirements for the transport infrastructure rather than rules controlling general land use. The new explanation makes this clearer.	
S17.41	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.4:	Decision requested: Need clarification between Tier 1 and Tier 3 obligations. (Discussed under Objective CC.2)	Noted	
S19.26	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land	Policy CC.4:	Are there district plans that do not permit EV charging and cycle ways? Our PDP enables this infrastructure, and it is our understanding other second generation plans do. What is the RM issue this policy is trying to address?	Yes, there are plans that do not permit transport infrastructure e.g. rules relating to above ground utility structures (bus shelters, stands for e-scooters), cycleways can require RMA approvals in some plans (e.g. HCC has a rule requiring consent for all alterations to roads).	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
		Transport Plan				
S20.43	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.4:	Support the inclusion of O's, P's, and M's in the District Plan to enable infrastructure for low carbon, multimodal include charging stations and cycleways.	Noted	
S24.025	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.4:	EV charging stations and cycleways are not going to solve all the emissions problems in the transport sector. Decision requested: "... enable infrastructure that supports the uptake of zero and low-carbon multi modal transport, such as public transport, EV charging network, car share schemes, and cycleways.	The example list removed from the policy and put in 'Explanation'. The intent was not to have an exhaustive list.	
Policy CC.10						
S23.93	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy CC.10:	The Trust supports in principle support the intent of Policy CC.10. The Trust wants to ensure that maximising modal shift from private vehicles to public transport or active modes does not exacerbate existing inequalities. That is, ensuring accessibility for all capabilities - those who cannot easily walk or cycle, ensuring equity for Māori, and those with care-giving responsibilities. For example it is reported that low-income people in some areas consider it essential to own a car, because they have no other way to do what they need to get done in their lives. Work and other activities are not close enough to walk to; the cycling networks are not safe enough; and public transport is neither frequent nor direct for people who do not work in the central city and live close to train lines or rapid bus routes.	Policies 'Equity and inclusiveness', 'Prioritising affordable high quality active mode and car share infrastructure and public transport services – Regional Land Transport Plan'; jointly with Policy CC.9 provide 'check and balance' to ensure the inequities are not exacerbated, as well as link to Objective CC.1A Hopefully this address the Trust's concerns.	**<u>Policy CC.9: Reducing greenhouse gas emissions and transport infrastructure – consideration</u>** <u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and development have been planned to optimise overall transport demand, maximising mode shift from private vehicles to public transport or active modes, in a way that contributes to reducing greenhouse gas emissions.</u> <u>Explanation</u> <u>This policy requires regional and district councils to consider whether subdivision, use and development proposals have fully considered all options to reduce greenhouse gas emissions.</u>
S19.43	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy CC.10:	Decision requested: As per our comments on CC.4, these need to be in an objective rather than a policy.	Targets moved into the objective.	
S20.65	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy CC.10:	We support the requirement for development to minimise overall transport demand, transition to mode share, reductions in public transport emissions and all transport. However, the focus should be on the largest generators of emissions. It is unlikely that public transport/mode shift will be as successful in rural Wairarapa, particularly given the largely walkable towns and rural land uses.	Noted	
S24.030	Wellington City Council	4.2 Regulatory policies - matters to	Policy CC.10:	Alignment with the National Emissions Reduction Plan (ERP) Decision requested:	Our targets are in line with the national target. Out transport targets are slightly more ambitious however, the regional targets can be more ambitious than national targets.	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
		be considered		Emissions reduction targets outlined in Policy CC.10: Transport infrastructure - consideration" (page 102) could be aligned to the national ERP. Please see page 172 in the ERP here: https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf.		
S9.34	Hutt City Council	4.2 Regulatory policies - matters to be considered	Policy CC.10:	These targets are much too specific to achieve in any meaningful way in a resource consent application Decision requested: Delete (a) to (c)	Targets moved into the objective	
Policy CC.11						
S23.94	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy CC.11:	The Trust supports in part Policy CC.11. The Trust seek further amendments to protect and provide for mana whenua values. Decision requested: Policy CC.11: Freight - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan for freight distribution centres and new industrial areas or similar activities with significant freight servicing requirements, particular regard shall be given to the proximity of efficient transport networks and locations that will contribute to efficient freight movements and minimising associated greenhouse gas emissions, **while ensuring that mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga are protected and provided for;.**	There is an existing Policy 49 that provides for ensuring that mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga are protected and provided for.	**Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions – consideration** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan for freight distribution centres and new industrial areas or similar activities with significant freight servicing requirements, particular regard shall be given to the proximity of efficient transport networks and locations that will contribute to efficient freight movements and minimising associated greenhouse gas emissions. Explanation This policy requires decisions for freight land use or servicing to consider transport efficiency to contribute to minimising greenhouse gas emissions.
S16.43	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy CC.11:	Support: We support the direction on the matters that should be considered when considering proposals for freight distribution centres. Decision requested: Retain Policy CC.11.	Noted	
S19.44	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy CC.11:	Support - this region needs to address this issue through future development strategies and spatial planning. This is not currently well addressed in the system	Noted	
S20.66	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy CC.11:	Freight Distribution centres and industry required close proximity to efficient location with transport networks minimise greenhouse gas. - No real comments here	Noted	
Policy CC.12						
S16.44	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy CC.12:	Oppose in part: We oppose this policy on the grounds it applies to district and city councils. Emissions do not fall under the jurisdiction of city and district councils. Decision requested: Delete requirement for city and district councils under Policy CC.12. Ensure this is a regional council matter only.	Legal advice is that this can apply to both.	**Policy CC.11: Encouraging whole of life carbon emissions assessment – consideration** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, a whole of life carbon emissions assessment is encouraged for all new or altered transport infrastructure as part of the information submitted with the application. This information will assist with

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
S23.95	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy CC.12:	The Trust supports Policy CC.12.	Noted	evaluating the potential greenhouse gas emissions, options for reducing direct and indirect greenhouse gas emissions and whether the infrastructure has been designed and will operate in a manner that contributes to the regional target for a reduction to transport-related greenhouse emissions. Explanation: This policy encourages a whole of life carbon emissions assessment for new or altered transport infrastructure. This assessment will provide information and evidence on predicted emissions to enable assessment of impacts and options in the context of regional targets to reduce greenhouse gas emissions. Waka Kotahi has a tool providing accepted assessment methodology.
S17.56	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy CC.12:	When will the district or regional function be determined? What guidance will be made available to assist applicants with this assessment?	There is a related Method.	
S19.45	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy CC.12:	At what scale? Who has the expertise to assess these?	There is sufficient expertise for carbon assessment and relevant tools (see Waka Kotahi). Unclear what is meant by 'scale'. The policy applies to new and altered transport infrastructure.	
S20.67	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy CC.12:	Support that whole of life transport emissions assessments are 'encouraged' for all new or altered transport infrastructure within applications/consideration. Any assessment should demonstrate how contributes to regional targets.	Noted	
S18.18	Waka Kotahi	4.2 Regulatory policies - matters to be considered	Policy CC.12:	When would these changes come into effect and do they require the changes proposed in the RM Amendment Act to have come into force in order for this policy to apply?	Any such objectives and policies would not be given any weight in consenting until the RMA prohibition is revoked in November 2022. The policy currently only 'encourage'.	
S24.031	Wellington City Council	4.2 Regulatory policies - matters to be considered	Policy CC.12:	A very weak policy that undermines the ambition and urgency to reduce emissions. Decision requested: New Zealand has declared a climate emergency, committing to urgent action on reducing emissions, but this policy does not reflect this. We recommend replacing the term "Encouraging" by "Requiring" in "Policy CC.12: Encouraging whole of life carbon emissions assessment - consideration", and also changing the texts below it accordingly (please see the last para in page 102). Given that we are moving to a consumption-based emissions inventory for our city, requiring this information will enable us preparing/updating our city inventory and help us understanding how well we are progressing towards our interim as well as 2050 emissions targets.	Did not include change from encourage to require. Any such objectives and policies would not be given any weight in consenting until the RMA prohibition is revoked in November 2022. The policy currently only 'encourage'.	
Method CC.11						
S20.83	South Wairarapa District Council	4.5.2 Non-regulatory methods - information and guidance	Method CC.11:	Support clarity for when travel demand management plans are required for land use activities.	Noted	**Method CC.11: Travel demand management plans** Where requested, the Wellington Regional Council will assist city and district councils with determining land use thresholds for triggering a Travel Demand Management Plan requirement, as well as guidelines for a Travel Demand Management Plan that city and district councils can provide to developers to assist them with mitigating the travel movements and associated greenhouse gas emissions arising from new subdivision, use and development.
S20.97	South Wairarapa	4.5.5 Non-regulatory methods -	Method CC.11:	Method CC11 - Supports clarity by GWRC developing thresholds for Traffic demand.	Noted	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
	District Council	providing support				*Implementation: Wellington Regional Council*
Method CC.9						
S20.96	South Wairarapa District Council	4.5.5 Non-regulatory methods - providing support	Method CC.9:	Any more to price transport and incentives for mode shift requires more discussion before inclusion.	This is only advocating not implementing or leading to any directive policies.	**Method CC.7: Advocating for the use of transport pricing tools – non regulatory method** Actively advocate to the Government to introduce new regulatory functions or tools for councils to manage congestion and greenhouse gas emissions within major urban areas through use of pricing tools and/or taxes. *Implementation: Wellington Regional Council*
Method CC.10						
S23.129	Ātiawa ki Whakarongotai Charitable Trust	4.5.5 Non-regulatory methods - providing support	Method CC.10:	Without knowing the detail of what is proposed by Regional Council the Trust is concerned that incentives could have uneven impact on Māori and further exacerbate existing inequalities. The Trust seeks that Regional Council explore options that provide for members of society that will be most adversely impacted by such methods.	This policy only directs GW to develop incentives, and it highlights equitable and inclusive transition which should provide enough direction to GW and hopefully mitigate the concerns raised in the feedback.	**Method CC.10: Establish incentives to shift to active and public transport – non regulatory** Establish, support and promote a range of incentives for uptake of zero and low-carbon multi modal transport to reduce greenhouse gas emissions, and to support an equitable and inclusive transition. *Implementation: Wellington Regional Council*

Te Mana o te Wai / Freshwater

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
General						
S18.024	Waka Kotahi	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement		Decision requested: Freshwater - similar to the above, we would be like to discuss to understand if there is a pathway for Waka Kotahi activities, and explore opportunities for the RPS to reinforce freshwater outcomes with transport networks such as through stormwater management.	Happy to discuss	
S10.006	Wairarapa Iwi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan		Decision requested: Would like the RPS to be as clear and directive as possible to TAs/developers in relation to water and urban development (e.g. water sensitive urban design/stormwater etc)	Agreed	
S10.005	Wairarapa Iwi	3.4 Fresh water (including public access)	3.4	Decision requested: Freshwater is not just 'water', but about ecosystems and the provisions need to reflect that (Te Mana o Te Taiao). NPS-FM (i.e. NOF) is a reductionist approach and didn't do the 'ecosystem' side all that well - need to ensure we are taking a holistic, values-based approach and not just relying on the NOF framework (need holistic, Mātauranga Māori values based metrics) Need to ensure language throughout is consistent with NPS-FM e.g. 'Particular regard' to TMOTW - is not strong enough,	See changes to individual provisions. The detailed comments on provisions by Wairarapa iwi have largely been accepted. The substantive issue of consideration policies being inappropriate for matters that have to be given effect to is agreed. Disagree with removing minimizing in relation to extent of earthworks for urban	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				must be 'give effect' to (provided detailed specific comments on this that have been worked through) GW to lift a number of freshwater consideration polices up to more directive chapter to 'give effect' to NPS-FM - but need to also ensure/draft consideration policie(s) to cover resource consents TMOTW must be referred to as a whole - not just the hierarchy of obligations RPS needs to emphasise that the values of Māori need to be considered (including resource consents) e.g. one of the things we can say in support around water sensitive urban design is around Māori values Essential freshwater package put a placeholder around wetlands in relation to scarcity as opposed to their actual value. Need to include its value Mātauranga Māori needs to be a strong part of the freshwater provisions Need to tighten up language around FMU's so they can't be played - or used in a way that wasn't intended Wanted reference to Te Rito o Te Harakeke in freshwater provisions Wanted stronger wording than 'minimising' (e.g. in the context of 'minimising earthworks') Wanted to be made explicit that draining of wetlands / groundwater /springs shouldn't be occurring Need to be directive about engaging with Mana Whenua - there is an assumption that those authorities are engaging with MW when they're not	earthworks, when this is coupled with a requirement to achieve target attribute states	
S20.9	South Wairarapa District Council	3.4 Fresh water (including public access)	3.4	It is difficult to assess the impact of the changes with so many placeholders. The amendments are generally supported, aside from further clarity around the language relating to TA's role in water quality and a broad brush approach to considering water supplies that are resilient to climate change. Our view is that GWRC is the primary, and most appropriate, authority addressing water quality. TA's should not be held to targets and limits for activities it is not responsible for under its functions in the RMA. For example, stormwater consents and municipal water takes are appropriate approvals to indicate specific requirements in the relevant networks to which they relate. Specific requirements can be included that can be implemented as conditions of development in the District Plan and/or bylaws.	Reject in part. Section 3.5(4) of the NPS-FM	
S23.135	Ātiawa ki Whakarongotai Charitable Trust	3.4 Fresh water (including public access)	3.4	Decision requested: The Trust notes that Regional Council have signalled their intention to include limited provisions in RPS Change 1 that give effect in part to the National Policy Statement for Freshwater Management 2020 (the NPS-FM); a separate freshwater plan change process will be publicly notified by Regional Council on, or prior to 31 December 2024, to fully give effect to the requirements of the NPS-FM. However, the Trust are concerned at the interim effect of RPS Change 1 where proposed provisions are dependent on other provisions that are yet to be determined through a freshwater plan change process. For example, Policy 14 and Policy 15 relate to reducing adverse effects on freshwater and managing activities to achieve 'target attribute states for water bodies and freshwater ecosystems'. However, target attribute states for the Kāpiti rohe will not be set until the freshwater plan change process and Whaitua Kāpiti are completed, Whaitua Kāpiti has not yet started. In addition, titles of policies reference Te Mana o te Wai, for example Policy FW.3 'Implementing Te Mana o te Wai in urban development', however, the policy wording lacks teeth to give effect to Te Mana o te Wai. It is the Trust's position that giving effect to Te Mana o te Wai is not only ensuring that freshwater is managed in accordance with target attribute states and environmental outcomes, it is to apply the intent and approach of Te Mana o te Wai to freshwater management. Although the local interpretation of Te Mana o te Wai and the requirements of the NPS-FM (such as the National Objectives Framework) will not be implemented until the Trust and the regional	See changes to individual provisions	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				council complete a freshwater plan change process and Whaitua Kāpiti process, the NPS-FM clearly signals the principles of Te Mana o te Wai, including the hierarchy of obligations. The Trust seeks that Regional Council reassess whether these policies uphold the intent and the meaning of Te Mana o te Wai, or are merely paying lip service.		
Introductory text						
S23.19	Ātiawa ki Whakarongotai Charitable Trust	3.4 Fresh water (including public access)	Introductory text	The introductory text provides the bare minimum reference to mana whenua. It is not clear how the current wording captures issues of significance to the Trust in regards to freshwater. The Trust requests Regional Council partner with the Trust to redraft the introductory text in accordance with the values identified in our Kaitiakitanga Plan (Whakarongotai o te Moana, Whakarongotai o te wā) and in line with the requirements of recent legislation (NPS-FM 2020).	No change being made to introductory text. Will substantially change this in full plan review.	
S25.010	Wellington Water	3.4 Fresh water (including public access)	Introductory text	Need to expand this discussion to address the conflict between the NPS-FM and the NPS-UDFC: Be good to identify the impact of stormwater flows (channelling, erosion, etc.), as well as sediment, contaminants, etc. Decision requested: "1. There is increasing demand on limited water resources~~There is a limited amount of water in water bodies available for human use and demand is increasing. The efficient management of water in the region's water bodies is a matter of vital importance for sustaining the wellbeing of people, communities and the regional economy.~~Wellington needs to manage its water differently to both: - support growth required under the NPS-UD and - give effect to Te Mana o te Wai as required by the NPS-FM. There is insufficient water available under the pNRP to support growth at the current per capita demand. Solutions to reduce demand per capita and provide additional water from the environment will be needed for growth to be successful without risk of drought management measures. Addressing the water supply conflicts between Te Mana o te Wai and growth is vital for Wellington Region. Freshwater allocation must prioritise the health and well being of water bodies and freshwater ecosystems in a way that implements mana whakahaere, kaitiakitanga and manaakitanga to give effect to Te Mana o te Wai. Parts of Wellington Region are already suffering water shortages, particularly during summer, and this will be exacerbated by growth, which must be provided for under the NPS-UD. Taking more water to support growth must be in a manner consistent with Te Mana o te Wai. The water allocation conflict is exacerbated by climate change, reducing the amount of water available during the peak demand of the summer months and increasing the risk of saline intrusion into coastal aquifers from sea level rise."	No change being made to introductory text. Will substantially change this in full plan review.	
Objectives						
S12.002	Ngā Hapū o Ōtaki	3.4 Fresh water (including public access)	Te Mana o te Wai objective	NB: Ngā Hapū o Ōtaki wish to be included in the development of these provisions and have attempted within this document to include our response and information direct from Te Mana o Te Wai in order to ensure those intentions are not watered down. Future fresh water management within our rohe is very significant to us.	Future Plan change 2024	Remove reference to method 34 in relation to Policy 14 in Table
S25.012	Wellington Water	3.4 Fresh water (including public access)	Objective 12	Decision requested: Supporting method 34 doesn't seem relevant to policy 14. Possibly water conservation has been conflated with water quality.	Agree. Remove reference to method 34 in relation to Policy 14 in Table	
S25.011	Wellington Water	3.4 Fresh water (including public access)	Objective 14	Objective 14:The engineers advise that 'allocated…efficiently' means 100% allocation, which is possibly not what is intended Decision requested:	Reject. Allocation and use should always be efficient	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				Freshwater 306vailable for use and development is **appropriately** allocated and used efficiently.		
Tables						
S20.10	South Wairarapa District Council	3.4 Fresh water (including public access)	Table 4:	Objective Policy 40 Placeholder - Te Mana O te Wai - No comment	Noted	Amend reference to Policy 42 in Objective 12 table Amend in Objective 14 table Policy FW.7 needs to be moved into Table 4 under Te Mana o Te Wai objective.
S17.7	Masterton District Council	3.4 Fresh water (including public access)	Table 4:	When will the placeholders be included re Te Mana o te Wai objective (NPS-FM) and freshwater visions objectives (NPS-FM). Joint processing consents: - how is this going to work?- what is going to trigger this process? What is the threshold?- what does this look like in practice?- what does this look like for iwi? Policy 40: - what is the intent of the amended wording from maintaining to protecting? what does this look like? Objective 14, method 47: why has this gone? Policy 44: what are the implications of this amendment? Decision requested: Further clarity and information required	See comments on individual provisions.	
S23.20	Ātiawa ki Whakarongotai Charitable Trust	3.4 Fresh water (including public access)	Table 4:	Table 4 contains placeholders for a Te Mana o te Wai Objective and a Freshwater Visions Objective, as required by the NPS-FM. Regional Council proposes to delete Objective 12 and replace it with these new objectives. Given Te Mana o te Wai will be defined through a separate freshwater planning process and Whaitua Kāpiti, the Trust is concerned that Objective 12 will be deleted, leaving no objective that protects freshwater - it is unclear what Regional Council's approach is here. The Trust requests Regional Council partner with the Trust to confirm the approach to freshwater and reference to Te Mana o te Wai whilst awaiting the outcome of the freshwater planning process and Whaitua Kāpiti.	Objective 12 is being replaced by the Te Mana o Te Wai Objective, which introduces the hierarchy of obligations and principles into the RPS. The front wording of this repeats the NPS-FM and will apply to all waterbodies and is stronger than the existing Objective 12. Further detail at a whaitua scale will be added either through plan change in 2024 or through submissions on this plan change	
S23.21	Ātiawa ki Whakarongotai Charitable Trust	3.4 Fresh water (including public access)	Table 4A:	The reference to Section 62(1)(i)(iii) of the RMA is incorrect. This section applies to indigenous biodiversity, although this does include freshwater ecosystems, habitats, and species it appears to be the incorrect reference for Table 4A.	This was a mistake. Has been changed	
Policy 12						
S20.26	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 12:	Not significant - set up for future FW processes	Noted	Policy 12: Management ~~**purposes for**~~ **of** ~~**surface**~~ **water bodies – regional plans** Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, rules and/or methods that: ~~require that water quality, flows and water levels, and the aquatic habitat of surface water bodies are to be managed for the purpose of safeguarding aquatic ecosystem health; and~~ ~~manage water bodies for other purposes identified in regional plans.~~ (a) are prepared in partnership with mana whenua; (b) achieve the long-term visions for freshwater; (c) identify freshwater management units (FMUs); (d) identify values for every FMU and environmental outcomes for these as objectives; (e) identify target attribute states that achieve environmental outcomes, and record their baseline state; (f) set environmental flows and levels that will achieve environmental outcomes and long-term visions; (g) identify limits on resource use including take limits that will achieve the target attribute states, flows and levels and include these as rules;
S14.022	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 12:	Decision requested: This policy does not make clear whose objectives that we are setting our vision for. Tangata Whenua objectives are not the same with the communities', the Crown's, or the Councils'. There are not clauses that mention Mana Whenua identifies Freshwater Management Units (FMUs), environmental flows, environmental outcomes, and limits co-designing with the Council. All sub-clauses could be re-phrased to say *'co-designed with Mana Whenua '.* FMUs need to align with Sites of Significance to iwi and Māori, and this has not been mentioned or referred to in this Policy.	Agreed addition made	
S23.46	Ātiawa ki Whakarongo	4.1 Regulatory policies -	Policy 12:	The Trust opposes in part Policy 12, in particular the wording of the title of Policy 12. The current wording and its reference to surface water	Changes made.	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
	tai Charitable Trust	direction to district and regional plans and the Regional Land Transport Plan		bodies [only] suggest that aquifers and ground water are not included in this policy. As it is currently worded the title does not uphold Te Mana o te Wai which includes a ki uta ki tai, mountains to sea approach. The Trust notes that the NPS-FM 2020 does not exclude reference to ground water and aquifers. The amendment suggested by the Trust would be in accordance with the definition of water body in the RMA 1991. The Trust have moved the requirement to give effect to Te Mana o te Wai to the introductory text of the policy, this ensures that all objectives, policies, rules and/or methods give effect to Te Mana o te Wai. Decision requested: Policy 12: Management of water bodies - regional plans Regional plans shall include objectives, policies, rules and/or methods **in accordance with Te Mana o te Wai, including the hierarchy of obligations that:** ~~(a) give effect to Te Mana o te Wai;~~ (b) achieve the long-term visions for freshwater as set out in objectives [Placeholder for vision objectives]; (c) identify freshwater management units (FMUs); (d) identify values for every FMU and environmental outcomes for these as objectives; (e) identify target attribute states that achieve environmental outcomes, and record their baseline state; (f) set environmental flows and levels that will achieve environmental outcomes; and (g) identify limits on resource use that will achieve the target attribute states, flows and levels and include these as rules; and (h) identify non-regulatory actions that will be included in Action Plans that will assist in achieving target attribute states (in addition to limits).	Note this policy now refers to all waterbodies, not just surface water.	(h) <u>identify non-regulatory actions that will be included in Action Plans that will assist in achieving target attribute states (in addition to limits); and</u> (i) <u>Identify non-regulatory and regulatory actions in Actions Plans required by the NPS-FM.</u>
Policy 13						
S17.22	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 13:	Unclear why this policy is being deleted?	Covered by changes to Policy 12	Policy 13 Deleted
S12.028	Ngā Hapū o Ōtaki	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 13:	Q. Management of groundwater - regional plans?	Covered by changes to Policy 12	
S23.47	Ātiawa ki Whakarongo tai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 13:	The Trust opposes the deletion of Policy 13. The Trust are concerned that there is no policy in the regional policy statement that provides for allocation limits for groundwater given Policy 12 applies to surface water only. The Trust seek that Policy 12 be amended to refer to all water bodies (see Policy 12 for additional comment). If Policy 12 is not amended to include ground water (or, refer to water) then the Trust seek that Policy 13 (b) is not deleted.	Covered by changes to Policy 12	
Policy FW.						
S16.17	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and	Policy FW.1:	Oppose: Freshwater responsibilities Council is concerned that the draft RPS is attempting to devolve the management of activities as they relate to freshwater to city and district councils, despite having no authority to do so under the RMA. While city	Reject. Section 3.5(4) of the NPS-FM. Changes have been made to identify roles more appropriately.	**<u>FW.3- Urban development effects on freshwater and the coastal marine area – district plans</u>**

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
		regional plans and the Regional Land Transport Plan		and district councils have implied obligations under Section 31 to control the use of land to protect the natural and physical environment, these obligations are not as specific as those on regional councils to control the use of land under Section 30(1)(c) and Section 30(1)(f). Responsibilities for the management of land use and discharges as they relate to freshwater under the RMA sit firmly with regional councils. We are also concerned that any intention to hold city and district councils accountable for discharges of contaminants into, or from, our stormwater networks by third parties, or the improvement of waterbodies as a result of third parties discharge of contaminants is not lawful. Under section 338, liability for an offence sits with the person "who contravenes, or permits a contravention" of the Act. City and district councils do not permit the discharge of contaminants to the environment under Section 15 of the RMA and therefore should not be held criminally liable for it if others breach contaminant discharge requirements. Decision requested: Delete all draft and existing freshwater management requirements for district plans throughout Draft RPS Change 1. Delete methods specifying joint processing of resource consents. Establish relationships between regional, city and district council resource consents departments via non-regulatory methods outside of the RPS.		District plans shall include objectives, policies, and methods including rules, must give effect to Te Mana o te Wai and section 3.5(4) of the NPS-FM, and in doing so must: (a) Partner with mana whenua / tangata whenua in the preparation of district plans; (b) Protect and enhance Māori freshwater values, including mahinga kai; (c) Provide for mana whenua and their relationship with their culture, land, water, wāhi tapu and other taonga; (d) Incorporate the use of mātauranga Māori to ensure the effects of urban development on freshwater are considered appropriately; (e) Adopt an integrated approach, ki uta ki tai, that recognises the interconnectedness of the whole environment to determine the location and form of urban development; (f) Integrate planning and design of stormwater management to achieve multiple improved outcomes – amenity values, recreational, cultural, ecological, climate, vegetation retention; (g) Consider the effects on freshwater and the coast marine area of subdivision, use and development of land; (h) Consider the use and development of land in relation to target attribute states and any limits set in a regional plan; (i) Require that Water Sensitive Urban Design principles and methods are applied during consideration of subdivision, the extent of impervious surfaces and in the control of stormwater infrastructure; (j) Require that urban development is located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours; (k) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; (l) Require riparian buffers for all waterbodies and avoid piping of rivers; (m) Require *hydrological controls* to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows; (n) Require efficient use of water; (o) Manage land use and development in a way that will minimise the generation of contaminants, including building materials, and the extent of impervious surfaces; (p) Consider daylighting of streams, where practicable; and (q) Consider the effects of land use and development on drinking water sources.
S9.16	Hutt City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.1:	Clause (c) may be appropriate for the valley floor, but it will be more difficult for greenfield areas. Clause (g)- question whether it is possible legally to do this through the district plan. Clause (b) refers to principles of Water Sensitive Urban Design. These should be articulated in the RPS. Also, it is unrealistic to require all urban development to use WSUD through a district plan (which this implies would need to happen). Incorporating WSUD in a single development may not make sense due to the scale of the development and costs of ongoing management and maintenance (all of which can impact the effectiveness of the WSUD). May be better to make it clear that this may be at a neighbourhood-scale rather than for each development. Decision requested: Clarify the principles of Water Sensitive Urban Design. Clarify the scale of development that would be required to implement WSUD methods.	Principles of WSUD are well known in guidance documents. But won't be adding documents by reference at this point. Agree a lot of education is required across sectors. WSUD is appropriate at all scale. At small scale it can be very simple.	
S20.27	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.1:	While the introduction of requirements for urban development are extensive, it is generally supported in particular as it resolves the questions about what the responsibilities in the NPS FM are for TA's.	Noted	
S17.23	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.1:	Can we treat all locations as equal? Decision requested: More clarity required around removing effects to minimise, and how this will work with/align with other reforms This policy needs to allow for the protection of property and life.	Noted	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
S14.023	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.1:	Decision requested: The wording of the clause (b) takes away from the strength this Policy is anchored on. This could be rewritten to make the policy intent firmer for District and City Councils to say: '...*shall use Water Sensitive Urban Design in the design and construction of urban development'.* The clause (c) is using the word 'minimise' which does not have teeth when it comes to rules in the district plans, and their implementation. This clause caveats the land contours and extent practicable; it is unclear what triggers (rules) District Plans would have, this to be implemented. Most of the land is on challenging contours in Wellington and on hills that need to be cut out for feasible development to occur. Any mitigation that might be possible for flatter regions such as, Waikato or Auckland, may not be realisable, possible, or feasible in Greater Wellington. The policy should acknowledge and change the wording to say, *if it is going to increase the earthworks to the point that impacts are more than minor, it is not appropriate to continue with the land use proposal unless there is some ground-breaking mitigation is in place.* In summary, the policy contradicts itself because minimising earthworks in Wellington may not be able to be an option in some instances due to topography and soil conditions. The drafting intent of Policy FW.1 (f) is optimistic to reflect achieving multiple gains for stormwater management. In our built / urban environments, we observe the multiple issues of our stormwater network which won't be able to achieve the intent of this Policy. The policy should ensure there are stormwater-basics and bottom lines are achieved- not compromised then the policy intent could move onto amenity, recreational, cultural, ecological, climate, vegetation retention. The policy should focus on absolute musts of stormwater management and land development and acknowledge in the absence of standards and bottom lines, delivering other aspects may be a luxury. The policy needs to ensure the stormwater system provides safe and clever solutions to our communities then the rest, multiple positive outcomes, will come. The policy also needs to acknowledge the need of additional infrastructure to be able to give effect to this Policy.	Noted. Changes made to require WSUD. Minimising extent of earthworks is appropriate when coupled with requirements to achieve target attribute states and limits	
S19.10	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.1:	FW.1 (g) looks to be reassigning s30 functions to TAs, the regulation of discharge of contaminants to land or water. Are WSUD principles going to be articulated somewhere? As a new appendix? Otherwise, how do we know what these are. Decision requested: Include as a method global stormwater consents, stormwater management strategies and actions. Perhaps reference could be made to any methods required to be inserted into a DP by a stormwater management strategy under the PNRP?	Requirements for global stormwater consents covered by NRP	
S23.48	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.1:	The Trust supports in part Policy FW.1. The Trust seeks clarity on the reference to Water Sensitive Urban Design. It would be helpful if full reference is made to any external document, including the reference in Policy FW.1(b), as Regional Council is aware there are legal effects of including reference to external documents. The policy currently relies only on Water Sensitive Urban Design to provide and protect freshwater from the impacts of urban development. The policy does not include any reference to mana whenua values or mātauranga Māori. The Trust seek that the policy is amended to provide for Māori freshwater values. This would strengthen the policy to protect and provide for mana whenua and their relationship with land, water, sites, wāhi tapu and other taonga.	Additions made	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				Decision requested: Amend Policy FW.1 to include subclause: **(a) protect and enhance Māori freshwater values, including mahinga kai; (b) provide for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; (c) incorporate the use of mātauranga Māori to ensure the effects of urban development on freshwater are avoided;**		
S25.018	Wellington Water	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.1:	Have added some changes for clarity. Perhaps this should also apply to regional plans? Particularly for control of earthworks on sites beyond 3,000m2. Decision requested: Objectives, policies, rules and/or methods in **regional and** district plans shall:...(b) ensure that ~~urban development is designed and constructed using the principles of~~ Water Sensitive Urban Design **principles and methods are applied during urban development design and construction**; ...(f) integrate planning and design of stormwater management to achieve multiple **improved** outcomes – amenity values, recreational, cultural, ecological, climate, vegetation retention; and ...(g) require stormwater ~~quality~~ management**, land management and development planning** that will minimise the generation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater, **as well as preventing scour at the point of discharge(h) protect sources of drinking water from inappropriate use or development(i) require efficient use of water**	This policy is for district plans. Replacement of Policy 14 for regional plans. Changes noted and additions made	
Policy FW.2						
S9.17	Hutt City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.2:	It is highly unusual for the RPS to direct TAs to require financial contributions. This should be up to the TA to determine how to fund stormwater management. Decision requested: Delete the policy	Reject. The policy allows for either development contributions or financial contributions. Tied to Stormwater Management Plans	**<u>Policy FW.4: Financial contributions for urban development – district plans</u>** <u>District plans shall include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent where off site stormwater quality and quantity treatment is required, as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local Government Act) has been collected from the same development for the same purpose.</u> <u>*Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence*</u>
S17.24	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.2:	Agree - but we need to specify how one will use this in practice. Will this hinder intensification? Decision requested: Further clarify the impacts on intensification	Noted	
S20.28	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.2:	The intent of the policy, and whether it is vires in unclear. This is perhaps not an area GWRC needs to be 'in' and should allow TA's to formulate responses to meet its stormwater obligations via any relevant consents for its infrastructure.	The policy allows for either development contributions or financial contributions. Tied to Stormwater Management Plans	
S16.57	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and	Policy FW.2:	Oppose: Financial contributions for urban development, for the purposes of the functions, powers and duties of city and district councils are not a matter for an RPS to specify. We consider an RPS cannot require a district plan to include a rule in its district plan to impose	Reject. The policy allows for either development contributions or financial contributions. Tied to Stormwater Management Plans	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
		regional plans and the Regional Land Transport Plan		financial contributions for the purposes of addressing water quality and quantity, including contaminants in water. These matters fall firmly under the legal jurisdiction of regional councils. We note section 77E of the RMA enables GWRC to make rules requiring a financial contribution for the purposes it is seeking district plans to address. We recommend a rule requiring financial contributions in the regional plan is the most appropriate and lawful approach. Decision requested: Delete all requirements for district plans to include financial contribution provisions for the management of activities and adverse effects that fall under the jurisdiction of regional councils. We recommend GWRC considers the use of section 77E for its own purposes via its regional plan as provided for by the RMA.		
S10.007	Wairarapa Iwi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.2:	Decision requested: Need a clearer hierarchy around the 'financial contributions' from developers so that water sensitive urban design is provided first	There is not a choice. WSUD is required. Where a catchment solution is planned for in a Stormwater Management Plan, a contribution should be collected.	
S14.024	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.2:	Decision requested: Developers are required to make financial contributions to subdivision and development as a condition of their consent, ensuring that there is treatment for stormwater. It is commonly mentioned that these contributions have not been enough in the past and can only deliver less than ideal systems when it comes to stormwater systems. We are aware that Councils are geared up for reviewing their Financial Contribution policies as to identify what constitutes a 'fair contribution'. This policy could be reworded; instead of 'how a fair share of the cost is determined, and the nature of the contribution' it could focus on a realistic calculation of proposed development's greater connection with the current and existing infrastructure as well as the burden that it will lay on this infrastructure. It is unproductive for development contributions to just focus on the site-based stormwater systems instead of looking at the whole system and its connections. We have seen yet again many examples in Porirua, a development does not just have impacts where it is located but need to be considered within its overall downstream and upstream environments in the whole catchment and the infrastructure associated with it. We currently do not have well established systems to cope with existing loads regarding stormwater and wastewater overflows, let alone the needs of new subdivisions and development.	Noted. Some changes made to make clearer	
S19.11	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy FW.2:	This is a regional council function, looks to be reassigning s30 functions to TAs, the regulation of discharge of contaminants to land or water. Capability issues to implement this policy. PCC opposes financial contributions as a regulatory tool in general in our district plan as they are inefficient, and duplicates our existing approach of requiring development contributions and developer agreements administered under the Local Government Act.	Reject. Section 3.5(4) of the NPS-FM	
S23.49	Ātiawa ki Whakarongo tai	4.1 Regulatory policies - direction to	Policy FW.2:	The Trust supports Policy FW.2.	Noted	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
	Charitable Trust	district and regional plans and the Regional Land Transport Plan				
Policy 14						
S17.25	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 14:	Will need to be managed by both Regional and District Councils. District Councils currently being compelled by GWRC to obtain discharge consents for existing stormwater networks. We need clarity on the "roles" and "responsibilities" of the TA and Regional Council. Decision requested: Include "and District Plans."	District plans covered by Policy FW1	**Policy 14: Urban development effects on freshwater and the coastal marine area – Regional plans** Regional plan objectives, policies, and methods including rules, must give effect to Te Mana o te Wai and in doing so must: (a) Enable the active involvement of mana whenua / Tangata whenua in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for; (b) Adopt an integrated approach, ki uta ki tai, that recognises the interconnectedness of the whole environment to determine the location and form of urban development; (c) Require the control of both land use and discharge effects of the use and development of land, on freshwater and the coastal marine area; (d) Achieve the target attribute states set for the catchment; (e) Require the development, including stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan; (f) Require that urban development is designed and constructed using the principles of Water Sensitive Urban Design; (g) Require that urban development located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours; (h) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; (i) Require riparian buffers for all waterbodies and avoid piping of rivers; (j) Require *hydrological controls* to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows; (k) Require stormwater quality management that will minimise the generation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater; and (l) Identify and map rivers and wetlands.
S20.29	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 14:	This policy, possibly expanded Regional plans new and existing stormwater management to meet FW objectives for water quality, as opposed to holding TA's accountable for third party development that doesn't meet FW Objectives. It is also an opportunity to specify where the responsibility lies for accepting/applying for stormwater discharges as part of a reticulated system.	Reject. Section 3.5(4) of the NPS-FM	
S10.008	Wairarapa Iwi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 14:	Decision requested: Check consistency of language between Policy 14 / 15 (14 needs to be strengthened to make more robust e.g. 'where reduction is needed to achieve target attribute states' or inclusion of 'maintaining and enhancing')	Policy completely reworded	
S14.025	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 14:	Decision requested: It is worthwhile to consider whether this policy could also be included in District Plans, not just the Regional Plans. The word 'manage' is not ideal as it refers to a world that we may never reduce the contamination. It is not appropriate that, with this wording we are required to accept some form of contamination to constantly occur. It is ideal that the policy intent reflects the contamination from stormwater will be phased off because we have rules and provisions in place that we stopped the contamination to reach to our rivers, ocean, and wetlands. New and existing subdivision and development (their regulation mostly covered by District Plan clauses) should not allow paru water reaching to our precious freshwater environments, in which some of them are severely contaminated already.	Policy FW1 covers district plans. Policy has been completely reworded	
S19.12	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 14:	Isn't this a duplication to some extent with Policy FW1 clause (g) which requires district plans do this (which we oppose)? Also covered by global stormwater discharge consents held by Wellington Water.	Noted	
S23.50	Ātiawa ki Whakarongo tai	4.1 Regulatory policies - direction to district and	Policy 14:	The Trust supports in part the amendments to Policy 14.	Noted	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
	Charitable Trust	regional plans and the Regional Land Transport Plan				
S9.18	Hutt City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 15:	Decision requested: It is unclear what the 'target attribute states' are	Meaning as per NPS-FM	
Policy 15						
S17.26	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 15:	Is limiting development the intent of this policy? Why is minimise removed? Please clarify what this means, is it seeking to have an environmental bottom line under the NPSFW? Decision requested: Further clarity required with this policy	NPS-FM requires "bottom lines". As such there is the potential to limit development in some places	**Policy 15: ~~Minimising~~ Managing 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~~ the extent necessary to achieve the target attribute states for water bodies and freshwater ecosystems including its impacts on the life-supporting capacity of soils, and to provide for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. ~~(a) erosion; and~~ ~~(b) silt and sediment runoff into water, or onto land that may enter water, aquatic ecosystem health is safeguarded.~~
S20.30	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 15:	It is inappropriate to hold TA's to account for RC functions under the RMA.	Reject. Section 3.5(4) of the NPS-FM	
S14.026	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 15:	Decision requested: It is worthwhile to consider whether this policy could also be included in District Plans, not just the Regional Plans. The word 'manage' is not ideal as it refers to a world that we may never reduce the contamination. It is not appropriate that, with this wording we are required to accept some form of contamination to constantly occur. It is ideal that the policy intent reflects the contamination from stormwater will be phased off because we have rules and provisions in place that we stopped the contamination to reach to our rivers, ocean, and wetlands. New and existing subdivision and development (their regulation mostly covered by District Plan clauses) should not allow paru water reaching to our precious freshwater environments, in which some of them are severely contaminated already. By using the word 'managing' we are accepting and acknowledging the effects of earthworks and vegetation disturbance instead of avoiding these activities to achieve the target attribute states for water bodies and freshwater ecosystems.	The policy does cover district plans. Manage is appropriate in a limits regime. Target attribute states must be achieved	
S19.13	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 15:	Duplication of roles in managing discharges of contaminants. How is a TA supposed to determine whether they are met or not? TAs are not equipped to measure and regulate water quality.	Reject. Section 3.5(4) of the NPS-FM	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
S23.51	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 15:	The Trust supports in part the amendments to Policy 15. The Trust seeks amendments to the use of the word Managing" as this suggests effects are ok if they are managed. The Trust prefers that effects are avoided. The Trust seeks further amendment to the policy to provide for mana whenua values to be protected from earthworks and vegetation disturbance. The Trust has observed that earthworks and vegetation disturbance have had significant adverse effects on areas of significance to mana whenua Decision requested: including disturbing pā	Noted. Manage is appropriate in a limits regime. Target attribute states must be achieved. Additional words relating to mana whenua added	
Policy 17						
S17.27	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 17:	This will be affected by the NPS-FW. Agree that the Regional Rules need to allow for the health needs of people. Would like to see this include the economic and cultural needs as well.	Noted. Economic needs are provided for but after the needs of waterbodies and the health needs of people	**Policy 17: ~~Water allocation~~ Take and use of water for the health needs of people – regional plans** Regional plans shall include policies, rules and/or methods ~~to ensure the allocation~~ that prioritises the health and wellbeing of the waterbody and freshwater ecosystems first, and then prioritizes any take and use of water ~~from any river or groundwater source provides sufficiently~~ for the health needs of people~~., including:~~ The health needs of people include: (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 community supplies; and (d) the taking of water for marae. **Policy FW.1: Reducing water demand – regional plans** Regional plans shall include policies, rules and/or methods to manage demand of water from registered water suppliers and users, including: (a) provisions addressing public and private water losses, including leaks; (b) provisions requiring efficient end use of water for new developments; (c) provisions addressing alternate water supplies for non-potable uses, particularly in the summer months; and (d) water conservation measures, particularly in the summer months. **Policy FW.2: Reducing water demand – district plans** District plans shall include policies, rules and/or methods to manage demand of water from registered water suppliers and users, including where practicable: (a) provisions improving the efficiency of the end use of water on a per capita basis for new developments; and (b) provisions requiring alternate water supplies for non-potable use in new developments.
S20.31	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 17:	Support takes of water for health ahead of other uses - support for municipal takes.	Noted	
S12.029	Ngā Hapū o Ōtaki	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 17:	Decision requested: Policy 17: Take, **measuring** and use of water for the health needs of people- regional plans Regional plans shall include policies, rules and/or methods that prioritise any take, **the measurement** and use of water from any river or groundwater source provides sufficiently for the health needs of people, ahead of any take and use for other purposes, while ~~providing for~~ **ensuring** the health and well-being of water bodies and freshwater ecosystems.: The health needs of people includes: (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 community supplies; and (d) the taking of water for marae.	Measuring water takes is more appropriate in policy 18 and 44.	
S14.027	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 17:	Decision requested: This policy contradicts Te Ao Māori view that humans do not sit at the centre of Taiao and take and use of water is just for health needs of the people. The policy detail that says 'providing for the health and wellbeing of water bodies and freshwater ecosystems' in a way covers this view but also contradictorily says the 'health needs of people ahead of any take and use for other purposes while providing for...'	Agreed. Policy redrafted.	
S23.52	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the	Policy 17:	The Trust oppose in part the amendments made to Policy 17. The NPS-FM 2020 sets out a hierarchy of obligations in Te Mana o te Wai that priorities: (a) first, the health and well-being of water of water bodies and fresh-water ecosystems, (b) second, the health needs of people (such as drinking water), (c) third, the ability of people and communities to provide for their social, economic and cultural well-being now an into the future. The Trust note that Policy 17 puts first the second priority in	Agreed. Policy redrafted	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
		Regional Land Transport Plan		the hierarchy of obligations, ahead of the first priority (or obligation). In addition, the Trust do not consider the intent of the hierarchy of obligations is to be balanced in accordance with the wording of Policy 17. It is the Trusts view that the hierarchy of obligations as set out in the NPS-FM very clearly sets out that the health and well-being of water bodies and freshwater ecosystems is to be put first. The Trust is concerned that this policy inadvertently sets out an offsetting regime, that you can take water for human use as long as you still provide for health and well-being.		
S25.019	Wellington Water	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 17:	Policy 17 doesn't need changing however we suggest the inclusion of three additional policies at this location, being:P17A: protection of water for the health needs of peopleP17B: regional plans - managing water demandP17C: district plans - managing water demand Decision requested: Policy 17A: Protection of water for the health needs of people - regional and district plans Regional and district plans shall include policies, rules and/or methods that prioritise drinking water source protection for registered water suppliers ahead of other land use, discharges, takes or other activities. Policy 17B: Reducing water demand - regional plans Regional plans shall include policies, rules and/or methods to manage demand of water from registered water suppliers and users, including:(a) provisions addressing public and private water losses, including leaks (b) provisions requiring efficient end use of water for new developments(c) provisions addressing alternate water supplies for non-potable uses, particularly in the summer months (d) water conservation measures, particularly in the summer months Policy 17C: Reducing water demand - district plans District plans shall include policies, rules and/or methods to manage demand of water from registered water suppliers and users, including where practicable:(a) provisions improving the efficiency of the end use of water on a per capita basis for new developments, and(b) provisions requiring alternate water supplies for non potable use in new developments.	Policies FW.1 and FW.2added	
Policy 18						
S12.036	Ngā Hapū o Ōtaki	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 18:	Decision requested: (a) promoting the retention of in-stream habitat diversity by retaining natural features - such as pools, runs, riffles, and the river's natural form; (b) promoting the retention of natural flow regimes - such as flushing flows; (c) promoting the protection and reinstatement of riparian habitat; (d) promoting the installation of off-line water storage; **(e) measuring and evaluating water take;...**	Addition made	**Policy 18: Protecting and restoring ~~aquatic~~ ecological ~~function~~ health of water bodies – regional plans** Regional plans shall include policies, rules and/or methods that protect and restore the ecological health of water bodies, including: (a) managing freshwater in a way that gives effect to Te Mana o te Wai; (b) actively involving mana whenua / tangata whenua in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for; (c) there is no further loss of extent of natural inland wetlands and coastal wetlands, their values are protected and their restoration is promoted; (d) achieving environmental outcomes, target attribute states and environmental flows and levels; (e) avoiding the loss of river extent and values; (f) protecting the significant values of outstanding water bodies; (g) protecting the habitats of indigenous freshwater species; (h) Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided;
S18.7	Waka Kotahi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 18:	Include 'where possible' to (e) and (g) to enable maintenance activities Decision requested: (e) discourage avoiding where possible the reclamation, piping, straightening or concrete lining of rivers; ...(g) discourage avoiding where possible the diversion of water into or from wetlands - unless the diversion is necessary to restore the hydrological variation to the wetland;	Wording changed to “restrict”	
S20.32	South Wairarapa	4.1 Regulatory policies -	Policy 18:	NRP to protect and restore ecol health waterbodies. Minor changes here.	Noted	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
	District Council	direction to district and regional plans and the Regional Land Transport Plan				(i) promote~~i~~ing the retention of in-stream habitat diversity by retaining natural features – such as pools, runs, riffles, and the river's natural form; (j) promote~~i~~ing the retention of natural flow regimes – such as flushing flows; (k) promote~~i~~ing the protection and reinstatement of riparian habitat; (l) promote~~i~~ing the installation of off-line water storage; (m) measuring and evaluating water takes; (n) ~~discourage~~ restricting the reclamation, piping, straightening or concrete lining of rivers; (o) ~~discourage~~ restricting stock access to estuaries, rivers, lakes and wetland; (p) ~~discourage~~ restricting the diversion of water into or from wetlands – unless the diversion is necessary to restore the hydrological variation to the wetland; (q) ~~discourage~~ restricting the removal or destruction of indigenous plants in wetlands and lakes; and (r) restoring and maintaining fish passage.
S14.028	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 18:	Decision requested: The policy seems to be strengthened by using the word 'avoid' in the Policy 18 (e), (f), (g), (h) and (i) maintaining the fish passages. It is unclear, though, if the policy intention is being levelled down with the word use of 'promoting' in the clause (a), (b), (c), and (d).It is unclear whether the hierarchy of these clauses are considered; where 'avoidance' should be emphasized more than the 'promotion' side of the Policy 18 whether should the 'avoiding' clauses be coming first before the less directive clauses. The wording 'promote' could be rewritten into 'ensure' or 'give effect to' and rendered to a more impactful and directive policy wording instead of promoting. This will balance the priorities targeted within this policy; 'avoid' and 'ensure' reflects better of the intention of the Policy 18. This Policy could apply to regional plans and the district plans.	Some wording changes. Policy applies to regional plans only. District plans covered by policy 40	
S17.28	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 18:	Note word strengthening from discourage to avoiding. Decision requested: Include artificial wetlands for protection	Wording changed from "discourage".	
S23.53	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 18:	The Trust support the amendments made to Policy 18. The Trust are pleased that Regional Council have strengthened the policy to ensure that activities with adverse effects on ecological ecosystem health are avoided.	Noted	
Policy 40						
S16.28	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy 40:	We oppose the requirement for city and district councils to consider these policies in its decision making on the specified matters on the basis the health and wellbeing of waterbodies and freshwater ecosystems are not a matter that falls under the jurisdiction of city and district councils. This is an existing issue in the RPS that we request be fixed as part of RPS Change 1. Delete requirements throughout the RPS for city and district councils to consider or manage activities for the purposes of freshwater management.	Agree	**Policy 40: ~~Maintaining~~ Protecting and enhancing the health and well-being of water bodies and aquatic ecosystems ~~aquatic ecosystem health in water bodies~~ – consideration** When considering an application for a regional resource consent, particular regard shall be given to: (a) ~~requiring~~ that water quality, flows and water levels and aquatic habitats of ~~surface~~ water bodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of waterbodies and the health and wellbeing of freshwater ecosystems ~~for the purpose of safeguarding aquatic ecosystem health~~; (b) that, ~~requiring~~ as a minimum, water quality in the coastal marine area is ~~to be~~ managed in a way that protects and enhances the health and well-being of waterbodies and the health and wellbeing of marine ecosystems.~~:~~ ~~for the purpose of maintaining or enhancing aquatic ecosystem health; and managing water bodies and the water quality of coastal water for other purposes identified in regional plans.~~
S20.49	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy 40:	Minor changes to align with amended NPS FM 2020 and Te Mana O te Wai. Decision requested:	Noted. This policy now only relates to regional consents	
S14.043	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 40:	Decision requested: Policy 40 is important to consider when evaluating consents however it is challenging to identify how developers and land users will implement these considerations and how the impact of Policy 40 (a) is assessed. The Policy requires that water quality, flows and water levels and	At the consent level the most important consideration is ensuring the hierarchy of obligations is applied to decision making.	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				aquatic habitats of surface water bodies are 'managed in a way that gives effect to Te Mana o Te Wai' it is unclear how this will be achieved. One other question related to this matter is that if an integrated view to water and a whole catchment approach is aimed at in this consideration, why this Policy only includes surface water bodies. Couldn't a development and land use activity negatively impact the groundwater?	Changes made so that it is clear all waterbodies are covered	(c) Providing for mana whenua / tangata whenua values, including mahinga kai; (d) maintaining or enhancing the functioning of ecosystems in the water body; (e) maintaining or enhancing the ecological functions of riparian margins; (f) minimising the effect of the proposal on groundwater recharge areas that are connected to surface water bodies; (g) maintaining or enhancing the amenity and recreational values of rivers and lakes, including those with significant values listed in Table 15 of Appendix 1; (h) protecting the significant indigenous ecosystems and habitats with significant indigenous biodiversity values of rivers and lakes, including those listed in Table 16 of Appendix 1; (i) maintaining natural flow regimes required to support aquatic ecosystem health; (j) maintaining or enhancing space for rivers to undertake their natural processes: (k) maintaining fish passage; (l) protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning; (m) ~~discouraging~~ restricting stock access to estuaries rivers, lakes and wetlands; and (n) ~~discouraging~~ avoiding the removal or destruction of indigenous wetland plants in wetlands.
S23.73	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 40:	The Trust supports in part the amendments to Policy 40. The Trust seeks the amendments suggested in the adjacent column. The Trust maintains that a ki uta ki tai approach should include reference to water bodies to capture ground water and aquifers. This approach is consistent with the NPS-FM 2020. In addition, the changes sought by the Trust would improve consistency between the title of the policy and the words of the policy itself. Decision requested: Policy 40: Maintaining Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems aquatic ecosystem health in water bodies - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to: (a) requiring that water quality, flows and water levels and aquatic habitats of ~~surface~~ water bodies are managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of freshwater ecosystems (b) requiring, as a minimum, water quality in the coastal marine area to be managed in a way that gives effect to Te Mana o Te Wai and protects and enhances the health and well-being of freshwater ecosystems. **(c) Māori freshwater values, including mahinga kai**	Addition made	
Policy FW.3						
S12.042	Ngā Hapū o Ōtaki	4.2 Regulatory policies - matters to be considered	Policy FW.3:	Decision requested: Te Mana o Te Wai must be given~~ When~~ **consideration**~~ing~~ **to in any** application for a resource consent, notice of requirement, or a change, variation or review of a district plan, ~~the hierarchy of obligations in Te Mana o te Wai shall beapplied, and~~ particular regard shall be given to: (a) The location and form of urban development (b) considering the effects of subdivision, use and development of land, including the effects on receiving environments (both freshwater and the coastal marine area) (c) Using a whole of catchment integrated approach to planning the location and form of urban development (d) **Protecting and monitoring mahinga kai, taonga species, and sites of significance to mana whenua and consideration of cultural values** **(e) Ensuring the ability for fish passage and other migratory aquatic species is maintained or improved** **(f) Active engagement with mana whenua to ensure the continuing ability to express kaitiakitanga, manaakitanga and mana whakahaere within areas of urban development...**	FW3 no longer in plan change. Has been folded into a new Policy 42	FW3 no longer in plan change. Has been folded into a new Policy 42.
S16.29	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy FW.3:	The RPS and regional plans are the appropriate methods to address freshwater management. We do not consider it appropriate to attempt to place regional council functions, powers, duties and responsibilities on city and district councils unless a formal transfer of powers is made	FW3 no longer in plan change. Has been folded into a new Policy 42	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				under section 33 of the RMA. Regional councils have at their disposal the legal ability to impose regional land use methods to address these matters, including via rules and standards in its regional plans. We note when considering applications for resource consents, city and district councils are already required to have regard to regional policy statements or proposed regional policy statements under section 104(1)(b)(v) of the RMA. We also note city and district councils are already required to have particular regard to a regional policy statement or proposed regional policy statement when making recommendations on notices of requirements under section 171(1)(a)(iii). We do not consider it appropriate or good resource management practice for an RPS to duplicate requirements that are already set out under the Act.		
S19.30	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy FW.3:	This would apply to any resource consent - needs to be more precise? Large scale brownfield? Or any new dwelling? Some of these matters such as protecting the extent and condition of wetlands, identifying and mapping streams are regional council functions. Many of these matters duplicate those in FW.1	FW3 no longer in plan change. Has been folded into a new Policy 42	
S20.50	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy FW.3:	In terms of (d) - meeting limits set in the NRP, this requirement is vague and not framed in a way that reflects GWRC's functions for setting and enforcing limits. Generally speaking, our view is that uses of land/discharges that affect water quality should be managed by GWRC for that purpose as set out as part of its functions in the RMA. It is difficult to see how development in the catchments of water bodies that are not achieving specific targets and limits have the ability to be declined by TA's in the way the RPS is proposed to be framed. The proposal may be more appropriately framed to 'recognise the extent to which waterbodies are meeting their targets or limits'. Other matters like water sensitive design, minimising earthworks are generally supported. The requirement in (g) to 'maximise' removal of contaminant may be too high a bar to achieve immediately. The term is probably redundant as the rest of the policy refers 'to the extent practicable', which is probably all that's required from the policy. The requirement in (i) to 'map' streams is unclear. Is this just identifying the extent? Is this more appropriately a responsibility of GWRC?	FW3 no longer in plan change. Has been folded into a new Policy 42	
S14.044	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy FW.3:	Decision requested: *Policy FW.3 Implementing Te Mana o Te Wai in urban development - consideration* is supported; clauses of (i) and (l) can be strengthened by rewording. Instead of minimising earthworks extent and volume of works, this could mean to say performing earthworks, will need to be justified as to when they are absolutely needed. Identifying and mapping streams also need to be done as part of the stormwater and related-infrastructure investigations, that are attached to the consent application. This consideration could be strengthened to say no negative impact will occur in the identified and mapped streams.	FW3 no longer in plan change. Has been folded into a new Policy 42	
S23.74	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy FW.3:	The Trust supports in part the current drafting of Policy FW.3 and seeks that reference to the hierarchy of obligations is retained. However, as it is currently worded, it is not clear how this policy would give effect to Te Mana o te Wai and the NPS-FM 2020. The Trust does not believe that this wording puts first the health and well-being of water bodies and ecosystems in regards to managing the effects of use, development or subdivision on freshwater. In addition, the policy does not include any reference to mana whenua values or mātauranga Māori. The Trust's proposed changes give effect to the legislation (NPS-FM 2020) including	FW3 no longer in plan change. Has been folded into a new Policy 42	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				Te Mana o te Wai and to provide for Ātiawa values and their relationship with the natural world. Decision requested: Policy FW.3: Implementing Te Mana o Te Wai in Urban Development - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, **the hierarchy of obligations in Te Mana o te Wai shall be applied,** and particular regard shall be given to: **(a) Māori freshwater values, including mahinga kai; (b) the relationship mana whenua have with their culture, land, water, sites, wāhi tapu and other taonga;** (c) The location and form of urban development (d) considering the effects of subdivision, use and development of land, including the effects on receiving environments (both freshwater and the coastal marine area) (e) Using a **'ki uta ki tai'** whole of catchment integrated approach to planning the location and form of urban development (f) Meeting limits for contaminants as set in the Natural Resources Plan (g) the use of Water Sensitive Urban Design principles and methods (h) hydrological controls that avoid adverse effects of runoff quantity (lows and volumes) (i) stormwater quality management that will maximise, to the extent practicable, the removal of contaminants (j) Topographical constraints (k) Minimising the extent and volume of earthworks (l) Protecting the condition and extent of wetlands (m) Requiring riparian buffers (n) Identifying and mapping streams (o) Avoiding loss of stream extent including by piping and reclamation.		
S25.024	Wellington Water	4.2 Regulatory policies - matters to be considered	Policy FW.3:	(d) needs to refer to consents as well as pNRP limits to make the connection clearer and prevent people passing the buck to us when they are reliant on our network(g) needs to also address generation of contaminants Need to also include water efficiency, source water protection and sufficient wastewater network capacity Decision requested: ...(d) Meeting limits for contaminants as set in the Natural Resources Plan **and any relevant network consents for the discharge of contaminants**...(g) stormwater quality management that will **minimise generation of contaminants and** maximise, to the extent practicable, the removal of contaminants...**(n) efficient end use of water and alternate water supplies for non-potable use(o) protecting drinking water sources from inappropriate use and development(p) applying an integrated management approach to wastewater networks including involvement of mana whenua as kaitiaki and allowance for appropriately designed overflow points where necessary to support growth and consideration of different approaches to wastewater management to resolve overflows**	FW3 no longer in plan change. Has been folded into a new Policy 42	
Policy 41						
S16.30	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy 41:	The RPS and regional plans are the appropriate methods to address freshwater management. We do not consider it appropriate to attempt to place regional council functions, powers, duties and responsibilities on city and district councils unless a formal transfer of powers is made under section 33 of the RMA. Regional councils have at their disposal the legal ability to impose regional land use methods to address these matters, including via rules and standards in its regional plans. We note when considering applications for resource consents, city and district councils are already required to have regard to regional policy statements or proposed regional policy statements under section 104(1)(b)(v) of the RMA. We also note city and district councils are	Reject. Section 3.5(4) of the NPS-FM	**Policy 41: <u>Controlling</u> ~~Minimising~~ the effects of earthworks and vegetation disturbance – consideration** When considering an application for a resource consent, ~~notice of requirement, or a change, variation or review of a regional or district plan~~, particular regard shall be given to controlling earthworks and vegetation disturbance <u>by</u> ~~to minimise~~: ~~erosion; and~~ (a) <u>considering whether the activity will achieve environmental outcomes and target attribute states;</u> ~~silt and sediment runoff into water, or onto~~

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				already required to have particular regard to a regional policy statement or proposed regional policy statement when making recommendations on notices of requirements under section 171(1)(a)(iii). We do not consider it appropriate or good resource management practice for an RPS to duplicate requirements that are already set out under the Act.		~~or into land that may enter water, so that healthy aquatic ecosystems are sustained~~; and (b) avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.
S19.31	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy 41:	41(b) and (c) are regional council functions, and this looks to be reassigning s30 functions to TAs, specifically the regulation of the discharge of contaminants to land or water. Jurisdictional and capability issues to implement this policy at a district level. What sort of consents and plan changes?	Reject. Section 3.5(4) of the NPS-FM	
S20.51	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy 41:	The policy needs to provide more clarity about who does what. Generally (a) is appropriate for TA's. The other matters are better aligned to RC functions.	Reject. Section 3.5(4) of the NPS-FM	
S14.045	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 41:	Decision requested: From this a good segue way is, *the Policy 41 Controlling the effects of earthworks and vegetation disturbance - consideration* as per the comments above, 'minimising' can be strengthened to say controlled or avoided. We agree that this needs to be a consideration.	Agree	
S17.45	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy 41:	Decision requested: More detail is required - wording is very broad	Direction quite specific and relates to target attribute states and limits	
S23.75	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 41:	The Trust supports in part the amendments to Policy 41, the amendments set out stronger tests to meet when a proposed activity is assessed against this policy. The Trust has some concerns how such tests will be measured where environmental outcomes and target attribute states are yet to be determined through a plan change to give effect to the NPS-FM 2020. The Trust seeks further kōrero with Regional Council on this matter.	Agreed	
Policy 42						
S16.31	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy 42:	The RPS and regional plans are the appropriate methods to address freshwater management. We do not consider it appropriate to attempt to place regional council functions, powers, duties and responsibilities on city and district councils unless a formal transfer of powers is made under section 33 of the RMA. Regional councils have at their disposal the legal ability to impose regional land use methods to address these matters, including via rules and standards in its regional plans. We note when considering applications for resource consents, city and district councils are already required to have regard to regional policy statements or proposed regional policy statements under section 104(1)(b)(v) of the RMA. We also note city and district councils are already required to have particular regard to a regional policy statement or proposed regional policy statement when making recommendations on notices of requirements under section 171(1)(a)(iii). We do not consider it appropriate or good resource management practice for an RPS to duplicate requirements that are already set out under the Act.	Agree	**Policy 42: Effects on freshwater and the coastal marine area from urban development – resource consents** When considering an application for a resource consent making decisions on a resource consent the regional council must give effect to Te Mana o te Wai and in doing so must have particular regard to: (a) Adopt an integrated approach, ki uta ki tai, that recognises the interconnectedness of the whole environment to determine the location and form of urban development; (b) Protect and enhance mana whenua / tangata whenua freshwater values, including mahinga kai; (c) Provide for mana whenua / tangata whenua and their relationship with their culture, land, water, wahi tapu and other taonga; (d) Incorporate the use of mātauranga Māori to ensure the effects of urban development on freshwater are considered appropriately; (e) The effects of use and development of land on water, including the effects on receiving environments (both freshwater and the coastal marine area); (f) The target attribute states set for the catchment; (g) Require that the development, including stormwater discharges, earthworks and vegetation clearance meets any limits set in a regional plan;
S14.046	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 42:	Decision requested: 'Minimising contamination' is not adequate wording for the intention of the Policy. It is ideal this consideration to Policy 42 is reworded to say, no contamination in stormwater.	Removed. Some contamination (but within limits) will always occur	
S23.76	Ātiawa ki Whakarongo	4.2 Regulatory policies -	Policy 42:	The Trust supports the amendment to Policy 42.	Noted	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
	tai Charitable Trust	matters to be considered				(h) Require that urban development is located and designed and constructed using the principles of Water Sensitive Urban Design; (i) Require that urban development located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours; (j) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries; (k) Require *hydrological controls* to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows; (l) Require stormwater quality management that will minimise the generation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater; (m) Require riparian buffers for all waterbodies and avoid piping of rivers; (n) Daylighting of rivers, where practicable; (o) Mapping of rivers and wetlands; (p) Efficient end use of water and alternate water supplies for non- potable use; (q) protecting drinking water sources from inappropriate use and development; and (r) applying an integrated management approach to wastewater networks including involvement of mana whenua as kaitiaki and allowance for appropriately designed overflow points where necessary to support growth and consideration of different approaches to wastewater management to resolve overflow.
Policy 43						
S20.52	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy 43:	The policy needs to provide more clarity about who does what. Generally (a) is appropriate for TA's. The other matters are better aligned to RC functions, more appropriately aligned with RC functions.	Policy 43 Deleted. Amendments made to Policy 18 and 40	Policy 43 Deleted. Amendments made to Policy 18 and 40.
S16.32	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy 43:	The RPS and regional plans are the appropriate methods to address freshwater management. We do not consider it appropriate to attempt to place regional council functions, powers, duties and responsibilities on city and district councils unless a formal transfer of powers is made under section 33 of the RMA. Regional councils have at their disposal the legal ability to impose regional land use methods to address these matters, including via rules and standards in its regional plans. We note when considering applications for resource consents, city and district councils are already required to have regard to regional policy statements or proposed regional policy statements under section 104(1)(b)(v) of the RMA. We also note city and district councils are already required to have particular regard to a regional policy statement or proposed regional policy statement when making recommendations on notices of requirements under section 171(1)(a)(iii). We do not consider it appropriate or good resource management practice for an RPS to duplicate requirements that are already set out under the Act.	Policy 43 Deleted. Amendments made to Policy 18 and 40	
S14.047	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 43:	Decision requested: How do we identify resource consents' ability to demonstrate the 'contribution to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems'? There is need for resource consents to show the environmental progress they are demonstrating in the application and proposal. It is unclear how this would be evaluated. Even in the cases of drafting clauses in consents,	Policy 43 Deleted. Amendments made to Policy 18 and 40	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				may not be doing much- what is our benchmark and how do we measure and label what is an ecosystem achievement? The consideration may not provide applicants and consent processing staff enough clarity and certainty to describe what is a contribution. Contribution as a word can be stronger; if this is a consideration it needs to match its empowering qualities and the level of higher order policy execution.		
S23.77	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 43:	The Trust suggests Regional Council further amend the wording of Policy 43 A. As it is currently drafted the structure of this policy is unhelpful and is inconsistent with the structure of the RPS. The Trust supports the intent of the amendments; however, it would benefit from further revisions. Decision requested: Policy 43: Protecting aquatic ecological function of water bodies - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given **to the contribution to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems, including:** ~~A. contributing to achieving environmental outcomes and target attribute states for water bodies and freshwater ecosystems~~ **(a) maintaining or enhancing the functioning of ecosystems in the water body;...**	Agree. Have pushed this up to directive policy	
Policy FW.4						
S19.32	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy FW.4:	Oppose, unrealistic and unnecessary. There are existing bulk water supply consents that will need to be reconsented in accordance with catchment level allocation limits, set through a plan change to the NRP. Spatial planning is another opportunity to consider this matter. It's inappropriate for this to be considered through a district plan change or a resource consent.	The point of this policy is for cities and district to plan for future development appropriately in terms of adequate water supply. It is supported by Wellington Water and some other TA's	**Policy FW.5: Water supply planning for climate change and urban development** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be given to: (a) climate change impacts on water supply, including water availability and demand; (b) demand from future population projections; (c) development of future water sources, storage, treatment and reticulation; and (d) protection of existing and future water sources.
S20.53	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy FW.4:	Support in principle water supply planning for climate change. However, the policy appears to require all processes/decisions to consider this. This is not necessary, nor efficient for (a), (b), and (c). The policy needs to be rethought and tools developed to target relevant processes, including through changes to policy guidance in the NRP. Focus could include municipal water takes, significant areas of growth and intensification where requirements can cascade down to more appropriate responses, including bylaws.	The point of this policy is for cities and district to plan for future development appropriately in terms of adequate water supply. It is supported by Wellington Water and some other TA's. Point on further policy guidance in the NRP noted	
S17.46	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy FW.4:	Agree. Important for future planning.	Noted	
S23.78	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy FW.4:	The Trust supports the intent of Policy FW.4. The Trust seeks a minor amendment to Policy FW.4. Decision requested: Policy FW.4: Water supply planning for climate change an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be **given to**~~had to~~: (a) climate change impacts on water supply, including water availability and demand (b) development of future water sources, storage, treatment and reticulation (c) protection of existing and future water sources.	Noted	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
S25.025	Wellington Water	4.2 Regulatory policies - matters to be considered	Policy FW.4:	This policy is required for more than just climate change. Its also to support urban growth as required by the NPS-UD and Te Mana o te Wai for the NPS-FM Decision requested: Policy FW.4: Water supply planning ~~for climate change~~When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be had to:(a) climate change impacts on water supply, including water availability and demand(b) development of future water sources, storage, treatment and reticulation(c) protection of existing and future water sources~~.~~ **to support Te Mana o te Wai, adapt to and mitigate the effects of climate change and support urban intensification/growth/development**	Agree that this policy should cover urban development (population growth) as well as climate change	
Policy 44						
S12.043	Ngā Hapū o Ōtaki	4.2 Regulatory policies - matters to be considered	Policy 44:	Decision requested: (e) **monitor and evaluate trends to ensure** ~~whether~~environmental outcomes and target attribute states are achieved.	Monitoring is covered. In considering a resource consent the council could use analytical tools to evaluate whether the application will impact on environmental outcomes and target attribute states. Trend analysis is only one option. If the take is within the limits set in the NRP (as required by this policy) environmental outcomes should be achieved	**Policy 44: Managing water takes and use to give effect to Te Mana o te Wai ~~to ensure efficient use~~ – consideration** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional plan to take and use water, Te Mana o te Wai must be given effect to so that ~~particular regard shall be given to:~~ (a) Māori freshwater values, including mahinga kai are provided for; (b) sites of significance, wahi tapu and wahi tupuna are protected; (c) Environmental flows and levels, including variability of flows, are achieved; (d) Take limits are achieved that provide for flow or level variability, safeguard ecosystem health, provide for the life cycle needs of aquatic life, and take into account environmental outcomes; (e) ~~whether~~ the applicant has demonstrated that the volume of water sought is reasonable and justifiable for the intended use, including consideration of soil and crop type when water is taken for irrigation purposes; (f) requiring the consent holder to measure and report the actual amount of water taken; ~~and~~ (g) requiring the consent holder to adopt water conservation and demand management measures and demonstrate how water will be used efficiently; and (h) there is consideration of alternate water supplies such as storage or capture of rainwater for use during the drier summer months
S14.048	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 44:	Decision requested: This consideration needs to consider the needs of iwi and Māori and should be able to give flexibility to the needs of Mana Whenua.	Additional words added	
S20.54	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy 44:	Support	Noted	
S23.79	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 44:	The Trust supports in part the amendments to Policy 44. The Trust seeks that reference to the hierarchy of obligations in Te Mana o te Wai is included. This approach is consistent with the NPS-FM 2020 and would ensure that the subclauses of Policy 44 are properly considered against the legislation (i.e. the NPS-FM). In addition, the Trust seeks that the policy provides for mana whenua values. The Trust supports the inclusion of subclause (d) and (e). Decision requested: Policy 44: Managing water takes and use to give effect to Te Mana o Te Wai ensure efficient use - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional plan to take and use water, particular regard shall be given to: **(a) Te Mana o te Wai, including the hierarchy of obligations (as set out in the NPS-FM 2020) (b) Māori freshwater values, including mahinga kai (c) the impacts of water takes and use on sites of significance, wāhi tapu and wāhi tūpuna** (a) whether the applicant has demonstrated...	Changes made	
S24.027	Wellington City Council	4.2 Regulatory policies - matters to be considered	Policy 44:	Policy 44: To give effect to te mana o te wai and to ensure public water supply Decision requested:	Covered by policy 17	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				Policy 44: Wording added to clarify the prioritisation of (community) water supply when managing take and use		
S25.026	Wellington Water	4.2 Regulatory policies - matters to be considered	Policy 44:	add a new clause for alternate water supplies Decision requested: (c)(A) considering alternate water supplies such as storage or capture of rainwater for use during the drier summer months	Clause added	
Policy FW.7						
S19.52	Porirua City Council	4.3 Allocation of responsibilities	Policy FW.7:	This contradicts policy 14. All adverse effects? Only on freshwater? Only the location and form - so not the actual use? That needs to be clear. Needs to be clear how the RC and TAs would work together for this to occur, when the RC holds all of the information on water quality. The NPS-FM and NES-F make it clear that the regulation of wetlands is a regional council function, and this should be clarified in the RPS.	Policy re-worded for further clarity. Detailing how RC and TAs would work together is outside of the scope of a jurisdiction policy. NPS-FM 3.5(4) makes it clear that territorial authorities have a role in freshwater with respect to urban development.	**Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater** Regional and district plans shall recognise and provide for the responsibilities below, when developing objectives, policies and methods, including rules, to protect and enhance the health and well-being of water bodies and freshwater ecosystems: (a) Wellington Regional Council has primary responsibility for freshwater. Wellington Regional Council shall be responsible for the control of the use and development of land for the purposes of water quality and quantity. (b) In relation to wetlands, Wellington Regional Council is responsible for managing land use within, and within a 10m margin of natural wetlands as directed by the NES-F 2020, as well as areas adjoining and/or upstream for the purpose of protecting wetlands; (c) city and district councils are responsible for the control of land use and subdivision. City and district councils must include objectives, policies, and methods in district plans to promote positive effects, and avoid, remedy or, or mitigate adverse effects (including cumulative effects) of land use and subdivision on the health and wellbeing of water bodies, freshwater ecosystems and receiving environments (as required by NPS-FM 3.5 (4)). They must carry out their responsibility in regard to the NPS-FM through their functions under Section 31 of the RMA. Explanation: Policy FW.7 outlines the allocation of responsibilities for land use and development controls for freshwater between Wellington Regional Council and territorial authorities.
S23.103	Ātiawa ki Whakarongotai Charitable Trust	4.3 Allocation of responsibilities	Policy FW.7:	The Trust supports Policy FW.7 as it clarifies the roles and responsibilities of regional and territorial authorities in accordance with the requirements of the NES-F 2020.	Policy re-worded for further clarity.	
S17.60	Masterton District Council	4.3 Allocation of responsibilities	Policy FW.7:	Why are artificial wetlands not included for protection? The amenity value of the districts artificial wetlands need to be taken into consideration Decision requested: Policy to include protection of artificial wetlands	This is beyond the scope of a jurisdiction policy. We are promoting artificial wetlands through policy direction for nature-based solutions and water sensitive urban design in other policies. However, unless they have been created for the purpose of indigenous biodiversity they should not be protected, and rather need to be actively maintained to continue to provide the intended services.	
S20.73	South Wairarapa District Council	4.3 Allocation of responsibilities	Policy FW.7:	This policy straddles the boundary of both policy direction and allocation of responsibilities. It needs to do one or the other. Similarly, the comments on TA responsibility in FW3 apply here. In particular, the term 'form' is somewhat vague.	Policy re-worded for further clarity. Have removed the policy direction to be more clearly jurisdictional. Policy FW.1 provides the complementary policy direction for this policy. NPS-FM 3.5(4) makes it clear that territorial authorities have a role in freshwater with respect to urban development.	
S25.028	Wellington Water	4.3 Allocation of responsibilities	Policy FW.7:	Decision requested: Wellington Water is not concerned with which responsibilities are allocated to each entity but is concerned that the split is clear without overlap or gaps. On that basis, the second sentence of clause (b), which commences with 'This includes...' lacks clarity. Would bullet points be helpful? The following wording seems particularly convoluted: '... protect and avoid, remedy or migate adverse effects on or the loss of...'. Its not just the development phase of structure planning and subdivision that needs to be addressed. The on-going use of the land is relevant. If the additional policies P17A-C are adopted, then water quality should also be addressed here.	Policy re-worded for further clarity. This policy applies to ongoing use and well as development of land.	
S16.062	Kāpiti Coast District Council	4.3 Allocation of responsibilities	Policy FW.7:	City and district councils have no functions, powers or duties to manage freshwater quality, or discharges to freshwater that may adversely affect water quality. The RMA places responsibility for the management	Policy re-worded for further clarity. NPS-FM 3.5(4) makes it clear that territorial authorities have a role in	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				of freshwater firmly with regional councils. On our reading, the existing RPS and draft RPS require and propose to require city and district councils manage activities for freshwater purposes, despite city and district councils having no lawful authority to do so under the RMA. This lack of authority is clear under section 338 of the RMA, meaning the Council would have no authority to enforce any provisions for the purposes of managing freshwater via discharges in contravention of section 15 of the Act, but would be criminally liable for the discharge of contaminants into stormwater by others. This is not an acceptable proposition to us. Decision requested: Delete Policy FW.7 and all other freshwater responsibilities proposed for city and district councils throughout Draft RPS Change 1. Take the opportunity through Change 1 to amend any existing RPS provisions that erroneously allocate freshwater responsibilities to city and district councils throughout the RPS. Progress non-regulatory methods by working with city and district councils to help raise awareness within communities of freshwater issues, including discharges.	freshwater with respect to urban development.	
Policy FW.5						
S10.009	Wairarapa Iwi	4.4 Non-regulatory policies	Policy FW.5:	Decision requested: GW consider further requirements around rain tanks both in a rural as well as urban context - that apply both to new developments as well as existing, and domestic and commercial settings. Be explicit about raintanks in method 34.	Agree. Reference added to method 34	**Policy FW.7: Water attenuation and retention – non-regulatory** Promote and support water attenuation and retention including: (a) nature based solutions including slowing water down in the landscape and increasing groundwater recharge (riparian management, wetland enhancement/restoration, flood management); and (b) built solutions including storage at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds).
S23.105	Ātiawa ki Whakarongotai Charitable Trust	4.4 Non-regulatory policies	Policy FW.5:	The Trust supports Policy FW.5.	Noted	
Policy FW.6						
S19.53	Porirua City Council	4.4 Non-regulatory policies	Policy FW.6:	Support - these activities are vulnerable to climate change.		**Policy FW.8: Land use adaptation policy – non regulatory** Promote and support water resilience and climate change adaptation in land use practices and land use change including: (a) Preparing and disseminating information about climate resilient practices (b) promoting water resilience in Farm Environment Plans; and (c) supporting primary sector groups and landowners in researching and promoting climate resilient land uses and pathways to move to new land uses.
S23.106	Ātiawa ki Whakarongotai Charitable Trust	4.4 Non-regulatory policies	Policy FW.6:	In principle the Trust supports Policy FW.6.		
Method FW.1						
S19.57	Porirua City Council	4.5.3 Non-regulatory methods - integrating management	Method FW.1:	Decision requested: Which consents? There should be a scale threshold for when joint consenting processes are undertaken. We also recommend the method is split into sections centered on processing consents, pre-application processes; monitoring consent conditions; and exchange of information and data.	Relates to consents for urban development (land use and subdivision). The threshold is for notified consents. Agree with method being split into components	**Method FW.2: Joint processing urban development consents** The Wellington Regional Council, district and city councils shall: (a) jointly process notified resource consents (where both regional and district consents are notified) for urban development and regionally significant infrastructure; (b) encourage resource consent applciants to engage with mana whenua / tangata whenua early in their planning; (c) collaborate on pre-application processes;
S16.56	Kāpiti Coast District Council	4.5.3 Non-regulatory methods -	Method FW.1:	Oppose: Joint processing We consider it inappropriate for the RPS to require joint processing" of resource consents. We prefer a case-by-case approach akin to the approach to joint hearings under section 102	Reject. Consents are not for different purposes. They all allow urban development to happen	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
		integrating management		of the RMA. It is also unclear how the practicalities of 'joint processing' would occur when applications for the same development are seeking resource consent under a district plan and a regional plan, but for different purposes with different information requirements. Decision requested: In summary, we support greater collaboration and dialogue with the regional council during resource consent processing, and consideration of holding joint hearings on a case-by-case basis, rather than the one-size-fits all approach of forcing joint processing of all notified consents for urban development and regionally significant infrastructure via the RPS.		(d) collaborate on the processing of non-notified resource consents; (e) collaborate on monitoring of consent conditions; and (f) exchange information and data to ensure integrated management. *Implementation: Wellington Regional Council, district and city councils*
S14.064	Ngāti Toa	4.5.3 Non-regulatory methods - integrating management	Method FW.1:	Decision requested: It is not clear what role Tangata Whenua has in this process.	The role of Tangata whenua is the same in joint processing	
S17.61	Masterton District Council	4.5.3 Non-regulatory methods - integrating management	Method FW.1:	Decision requested: Further clarity is required to confirm when a development proposal triggers the joint processing consent process We have a number of questions with regard to the joint processing of consents. In particular: o how is this going to work? o What will trigger this process? o What is the threshold? o What does this look like in practice? o What does this look like for iwi?	The threshold is for notified consents (both regional and district). Method has ben reworded to be clearer	
S20.84	South Wairarapa District Council	4.5.3 Non-regulatory methods - integrating management	Method FW.1:	Decision requested: Our experience is that GWRC are reluctant to work with TA's generally. While we accept that integrated development is desirable, our functions are often separate and effects from one jurisdiction may not be as severe as another jurisdictions. This should not be a requirement and addressed on a case by case basis. TA jurisdictions should not be used to make up for shortfalls in the frameworks of the NRP.	Reject.	
Method FW.2						
S14.065	Ngāti Toa	4.5.3 Non-regulatory methods - integrating management	Method FW.2:	Decision requested: As a method, it does not say much about the involvement of Tangata Whenua. This could be something that Tangata Whenua would want to co-design.	Agree. Additions made	**Method FW.1: Freshwater Action Plans** Prepare Freshwater Action Plans in partnership with mana whenua / tangata whenua, as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP, for each whaitua no later than December 2026. The freshwater action plans will outline non-regulatory measures, which, along with limits and other rules, will achieve target attribute states. Where an action plan is required by the NPS-FM it shall contain both regulatory and non-regulatory actions *Implementation: Wellington Regional Council*
S20.88	South Wairarapa District Council	4.5.3 Non-regulatory methods - integrating management	Method FW.2:	concern that limit setting will be undertaken by a 'non statutory method'. This needs to be a widely collaborative exercise.	Limits are always rules. The achievement of target attribute states often requires rules and non-regulatory methods (action plans)	
S23.120	Ātiawa ki Whakarongotai Charitable Trust	4.5.3 Non-regulatory methods - integrating management	Method FW.2:	The Trust seeks further amendment to Method FW.2 to correct the method in line with the legislative requirements set out by the NPS-FM 2020. The NPS-FM provides for more than one Freshwater Action Plan to be developed for an FMU (in the Wellington region context - whaitua). The Trust suggests adding the full date, not just the year 2026, to the timeframe for preparing a Freshwater Action Plan. This will provide the level of clarity required to effectively enforce the method. Decision requested: Method FW.2: Freshwater Action Plans Prepare ~~a~~ Freshwater Action Plan**s** as required by the NPS-FM to contribute to achieving the target attribute states set in the NRP, for **whole FMUs, parts of FMUs, or multiple FMUs** ~~each whaitua~~ no later than 2026. The freshwater action plans will outline **regulatory and** non-regulatory measures, which, along	Agree with changes except FMU's. A whaitua is an FMU. Agree there will be more than one action plan, and some of these will relate to sub- FMU's. This will be decided in NRP	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				with limits and other rules, will achieve target attribute states. Implementation: Wellington Regional Council		
Method 34						
S14.068	Ngāti Toa	4.5.3 Non-regulatory methods - integrating management	Method 34:	Decision requested: No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	Additions made	**Method 34: Prepare a regional water <u>supply</u> strategy** ~~With interested parties p~~ <u>P</u>repare a regional water strategy<u>, in partnership with mana whenua / tangata whenua</u>, to guide local authorities on <u>how to</u>: (a) ~~sustainable water use~~ <u>Improve and maximise efficient allocation of water including economic, technical and dynamic efficiency;</u> (b) reduce leakage and wastage from reticulation systems; (c) encourage efficient use of water including through onsite storage; (d) <u>secure sustainable water supplies for communities across the region, preparing for climate change;</u> (e) <u>plan ~~new~~ additional sources of water, including through storage (including raintanks), treatment, and distribution systems;</u> (f) demand management ~~and security of supply~~ <u>and water conservation programmes</u>; and (g) ~~rural and urban water quality~~ <u>developing methods to protect future and existing sources.</u> *Implementation: Wellington Regional Council* and city and district councils, <u>and water infrastructure providers</u>*
S20.90	South Wairarapa District Council	4.5.3 Non-regulatory methods - integrating management	Method 34:	support regional water supply strategy. Perhaps needs a timeframe.	Noted	
S17.63	Masterton District Council	4.5.3 Non-regulatory methods - integrating management	Method 34:	Decision requested: Further clarity is required with regard to implementation and transitional arrangements for Entity C (three waters)	Hopefully this will become evident	
S10.010	Wairarapa Iwi	4.5.3 Non-regulatory methods - integrating management	Method 34:	Decision requested: GW consider further requirements around rain tanks both in a rural as well as urban context - that apply both to new developments as well as existing, and domestic and commercial settings. Be explicit about raintanks in method 34.	Rain tanks included. And also added to Policy 44	
S23.122	Ātiawa ki Whakarongotai Charitable Trust	4.5.3 Non-regulatory methods - integrating management	Method 34:	The Trust supports in principle Method 34. The Trust seeks to partner with Regional Council on the development of the strategy. Water is recognised and provided for in legislation as a taonga to mana whenua, therefore mana whenua should have their views, values and mātauranga included in any water supply strategy developed under this method.	Noted	
Method 48						
S17.66	Masterton District Council	4.5.4 Non-regulatory methods - identification and investigation	Method 48:	Decision requested: Clarify how the Whaitua recommendations will be considered and/or included	This review is "beyond" any plan change to implement the whaitua recommendations. Its main purpose is to fundamentally review the allocation regime (first in first served), not allocation limits	**Method 48: <u>Water allocation policy review</u>** ~~Investigate the use of transferable water permits~~ <u>Review water allocation policy in the regional plan so that:</u> (a) <u>Freshwater is allocated and used efficiently;</u> (b) <u>All existing over-allocation is phased out and future over-allocation is avoided;</u> (c) <u>Avoid allocating water beyond a limit;</u> (d) <u>improve water allocation efficiency- including transferable permits;</u> (e) <u>provide for iwi and hapu rights and interests;</u> (f) <u>alternatives to first in first served are considered;</u> (g) <u>provide for equitable allocation;</u> (h) <u>adapt to climate change;</u> (i) <u>land use change to more climate resilient uses is promoted;</u> (j) <u>government direction on water allocation is considered; and</u> (k) <u>all matters regarding giving effect to the NPS-FM are considered</u> *Implementation: Wellington Regional Council** Reference to hapu added. This review is a fundamental review of the allocation framework. In particular, ways to move forward from first in first served allocation framework, and to address iwi and hapu rights and interests. This review doesn't related to a specific policy
S12.053	Ngā Hapū o Ōtaki	4.5.4 Non-regulatory methods - identification and investigation	Method 48:	Decision requested: (a) improve water allocation efficiency- including transferable permits; (b) provide for iwi rights and interests; (c) provide for equitable allocation; **(d) provide for the ability to measure water take;**	This is a fundamental review of the allocation regime (first in first served). Measuring water takes is more appropriate in policy 44.	
S23.124	Ātiawa ki Whakarongotai Charitable Trust	4.5.4 Non-regulatory methods - identification and investigation	Method 48:	The Trust notes RPS Change 1 has deleted Policy 13: Allocating water - regional plans. The Trust is concerned that Policy 12 (which provides for water allocation) applies only to surface-water. The Trust seeks clarity on what policies provide for groundwater allocation and management. It appears that the amendments to Policy 12 through this plan change supersede Method 48. Decision requested: Method 48:Water allocation policy review Review water allocation policy **(insert Policy XX)** in the regional plan and investigate and implement alternatives that: (a) improve water allocation efficiency-including transferable permits; (b) provide for iwi **and hapū** rights and interests (c) provide for equitable allocation (d) adapt to climate	

Submission Point	Submitter	Section	Provision	Feedback for provision	Response	New draft provisions drafted from original RPS
				change; (e) promote land use change to more climate resilient uses; and (f) respond to government direction on water allocation. (g) consider all matters regarding giving effect to the NPS-FM **2020** Implementation: Wellington Regional Council*		
S24.032	Wellington City Council	4.5.4 Non-regulatory methods - identification and investigation	Method 48:	Method 48 title has not been updated Decision requested: Table 4 - Policy 65 - Method 48: Delete (Investigate the use of transferable water permits) to (**Water allocation policy review**) add text.	Done	

Indigenous ecosystems

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
General						
S18.023	Waka Kotahi	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement		Decision requested: Indigenous biodiversity -This is a topic where we would like to discuss to understand if this will be consistent with the effects management hierarchy from the NPS Indigenous Biodiversity exposure draft and provide a pathway for Waka Kotahi activities. We would like to see the update on the inventory of biodiversity offsetting and compensation opportunities when available and understand if there will be ongoing opportunities to provide input into the inventory.	Happy to discuss	
S10.011	Wairarapa Iwi	3.6 Indigenous ecosystems		Decision requested: · Incorporate reference to Te Rito o Te Harakeke across provisions - ensure reference is to NPS-IB policy NOT the whakataukī. (**NOTE we may want to delete the whakataukī that is already in the RPS too**) · The Mauri Tūhono work is moving further than the legislation (underpinned by Māori values) - to what extent can we bring in/support where this is heading in the RPS · Draft a policy/method in the RPS that require GW to work with MW on a local expression of Te Rito o Te Harakeke, this would be an opportunity to bring in co-design with Whānau. · In relation to 'significant' all ecosystems should be thought about as significant. Unfortunately we often don't understand their significance until they're gone e.g. Carterton wastewater treatment plant-mudfish were discovered - and it was too late to be protected (so the wrong metric was used) · Want to discourage use of exotic species e.g. for flood management. Sometimes there's not the experience/research to support economics of native trees - Mātauranga Māori needed. · Need to make it clearer that Mana Whenua are kaitiaki and landowners/communities are stewards (don't put them at the same place in the provisions). Iwi should be regulatory and engagement with land owners non reg. Resulted in the development of policies IE.2; IE.3; around giving effect to Mana Whenua Values · Want policy around - in co-ordination with iwi, identify a set of	Reference to Te Rito o Te Harakeke incorporated across provisions; discussed incorporation with these iwi. Definition from NPS-IB added. Draft Mauri Tūhono framework is is not available yet. From discussion with GW Biodiversity staff understand the new provisions align with some of work identified in this framework Done – see Method IE.1: Give local effect to Te Rito o te Harakeke New objective 16A, policies and methods that recognise significance of maintaining and restoring all biodiversity, including the ecosystem processes that support them. Preference given to use of indigenous species e.g. Policy CC.7 – Split issues, objectives and policies to recognize and provide for this Added new Method IE.4 Kaitiaki indigenous biodiversity monitoring programme Provided for in revised new Objective 16B	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				'holistic' metrics to be used to identify indigenous ecosystem health – resulted in method IE:3 around establishing a kaitiaki indigenous monitoring programme · Need to acknowledge Iwi's special relationship to taonga/ endemic species, and their connection to cultural well-being · Need to incorporate effects management hierarchy	Different effects management hierarchy (EMH) direction in the NPS-FM, NSCPS and exposure draft NPS-IB. Inefficient to replicate this direction in the RPS. Already included in the PNRP. Direction added to the RPS in Policy IE.1 and Policy 47 to achieve better outcomes by strengthening the use of offsetting and compensation as part of the EMH.	
S13.005	Upper Hutt City Council	3.6 Indigenous ecosystems		Many of the draft provisions that do not appear to be supported by any existing legislation or higher-level strategic planning document such as a national policy statement. Particularly in relation to Indigenous biodiversity proposals as we consider that these provisions are inappropriate in advance of the NPS-IB being gazetted. We are concerned that draft provisions for indigenous biodiversity are being added in advance of the Gazettal of the NPS-IB and may end up inconsistent with the national direction when it is gazetted. We consider it more appropriate to wait until the NPS-IB is gazetted (anticipated to be the end of 2022) to make a comprehensive set of changes to the indigenous biodiversity provisions in the RPS.	No guarantee that the NPS-IB will be gazetted – we have waited many years. If it is gazetted this will be in the period of drafting the s42 reports so any misalignment, duplication etc can be addressed then.	
S12.010	Ngā Hapū o Ōtaki	3.6 Indigenous ecosystems	3.6	Decision requested: Human actions that continue to impact **significantly** on the remaining indigenous ecosystems include: · Modification and, in some cases, destruction of ecosystems by pest plants and animals, · ~~g~~**G**razing animals and clearance of indigenous vegetation · Contamination of aquatic ecosystems by sediment, pollutants and nutrients · Destruction of ecosystems as a result of development · **Flood control measures as well as d** ~~D~~raining wetlands and channelling or piping of natural waterways · Contamination of coastal ecosystems by stormwater and sewage discharges The restoration of ecosystems **also** relies upon the good will and actions of iwi, volunteers **and** landowners. There are a number of individuals, **iwi, community groups,** and organisations throughout the region that are working to restore indigenous ecosystems. The restoration of indigenous ecosystems on **public, iwi, and** private land provides both public and private benefit. Ecosystem health can be measured in a number of ways, including loss **populations** of individual species, ~~loss of~~ overall diversity of species, ~~loss of~~ an ecosystem's ability to function on an ongoing basis, and **the** loss or **re-establishment** of complete ecosystems and types of ecosystems. While the dramatic collapse of species or whole ecosystems can capture attention, the gradual erosion of ecosystems' sustainability is also a significant issue.	Some amendments accepted	See Proposed RPS Change 1 document, Chapter 3.6 Indigenous ecosystems for amendments.
S23.22	Ātiawa ki Whakarongotai Charitable Trust	3.6 Indigenous ecosystems	3.6	The Trust support the amendments made to Issue 1, particularly reference to mahinga kai.	Support noted	
S20.11	South Wairarapa District Council	3.6 Indigenous ecosystems	3.6	Generally, the provisions need to align better with the exposure draft of the NPS IB. Realistically, there will not be enough expertise to undertake the work in that timeframe. Similarly, the funding required is not currently in our LTP and may need to be provided over several years. Further, instigating listings without a review of the relevant DP framework is not	No guarantee that the NPS-IB will be gazetted – we have waited many years. If it is gazetted this will be in the period of drafting the s42 reports so any	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				good practice. Our preference is to gather SNA data, then develop a framework. Processes that set 'bottom lines' or 'limits' will clearly have a regulatory end use and should therefore be done in conjunction with the community.	misalignment, duplication etc can be addressed then. Extended timeframe for Policy 23 to 2025	
Issue 1						
S16.7	Kāpiti Coast District Council	3.6 Indigenous ecosystems	Issue 1:	Neutral It is unclear whether the additional text proposed here is opinion or based on an evidence base. Decision requested: Insert references to evidence base/ monitoring findings to support these statements.	Based on evidence base – refs to be included in s32 The most direct source of evidence is the Landcover Database, reported on the LAWA platform - see link. You can also find information on the reduction of rare and naturally uncommon ecosystems on the StatsNZ Environmental Indicators web pages for wetlands, duneland and naturally uncommon ecosystems. There's also a detailed report on the reduction in extent of indigenous forests in the region on the GWRC website here.	The region's indigenous ecosystems are reduced in extent The region's indigenous ecosystems have been significantly reduced in extent and are being increasingly fragmented. Loss of area, **ecological integrity** and **ecological connectivity** reduce the **resilience** of ecosystems to respond to ongoing pressures, threatening their persistence and that of the indigenous biodiversity and **mahinga kai** they support. The indigenous ecosystems most reduced in extent are ~~specifically~~: (a) wetlands (b) lowland forests (c) lowland streams (d) coastal dunes~~s~~lands and escarpments (e) estuaries (f) eastern 'dry land' forests.
S19.6	Porirua City Council	3.6 Indigenous ecosystems	Issue 1:	Have all of the regions indigenous ecosystems been reduced in extent? What timescales are being considered? We were challenged on this as a resource management issue in our PDP hearings.	See references above.	
S24.010	Wellington City Council	3.6 Indigenous ecosystems	Issue 1:	The text mentions reduction in indigenous ecosystems since human settlement, but doesn't mention the increasing revegetation of coastal and hill native bush in more recent decades, and the increase in native fauna in Wellington City, Wainuiomata and other areas. We should note where the trends are going the right way, as this can guide policy that is working. Decision requested: Add a paragraph on where indigenous ecosystems are increasing and being less threatened. For example, public support for indigenous ecosystems and landowners retiring farmland has led to regeneration of native bush on public land, rural gullies, farm retirement and urban backyards. This has significantly increased native habitats since xxx. Sanctuaries like Zealandia and ongoing pest control efforts in x and y areas are increasing the number and variety of native birds and invertebrates. Kiwi habitats have been expanded in the Orongorongos, with planning underway for kiwi habitats around Makara.	Recognise that there has been much conservation effort and natural regeneration in some areas. Understand that, given the scale of the loss, that the %change is small. But seeking science advice (pending) and may update prior to notification.	
Issue 2						
S12.011	Ngā Hapū o Ōtaki	3.6 Indigenous ecosystems	Issue 2	Decision requested: The region's remaining indigenous ecosystems, and the ecosystem processes that support them, continue to be degraded or lost **mostly** due to ongoing pressure from **introduced** invasive **and predatory** species, human use and development, and climate change.	Accepted 2 Amendments	The region's remaining indigenous ecosystems are under threat The region's remaining indigenous ecosystems, and the ecosystem processes that support them, continue to be degraded or lost due to ongoing pressure from introduced invasive and predatory species, human use and development, and the effects of climate change.
Issue 3						
S12.012	Ngā Hapū o Ōtaki	3.6 Indigenous ecosystems	Issue 3:	Decision requested: 3. Iwi and landowner values and roles are not adequately recognised and provided for Iwi values and their role as kaitiaki are not adequately recognised, **resourced** and provided for by the current approach to managing indigenous biodiversity. Landowners can sometimes feel alienated by the current approach and their conservation efforts could be better recognised and supported. **Iwi and landowners protecting and/or restoring indigenous ecosystems are to be supported in the future.**	Supporting (including resourcing) for the protection and restoration or ecosystems is addressed in the policies and methods (e.g Method CC.9)	3. Iwi and landowner values and roles are not adequately recognised and supported Mana whenua / tangata whenua values, including kaitiakitanga, are not adequately recognised and supported by the current approach to managing indigenous biodiversity. The conservation efforts of landowners, as stewards of their land, and local communities could be better recognised and supported.

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
S23.24	Ātiawa ki Whakarongotai Charitable Trust	3.6 Indigenous ecosystems	Issue 3:	While the Trust support in part the intent of Issue 3. The Trust seek further amendments (see adjacent column - 'changes sought'), particularly the Issue be separated into two distinct issues (i.e. Issue 3 Mana whenua values and roles are not adequately provided for, and New Issue 4. Land owner values are not provided for.) Decision requested: **3. Mana whenua values including kaitiakitanga are not adequately provided for by the current approach to managing indigenous biodiversity.**	The separation of the values and roles of mana whenua and landowners and communities is made at the policy level.	
S23.23	Ātiawa ki Whakarongotai Charitable Trust	3.6 Indigenous ecosystems	Issue 3:	The Trust support the amendments made to Issue 2.	Support Noted	
S19.7	Porirua City Council	3.6 Indigenous ecosystems	Issue 3:	We consider our PDP biodiversity policies balance iwi and landowner values with protecting values. PCC has funding constraints to assist individual landowners, but has a significant catchment wide riparian planting programme.	Noted	
S14.012	Ngāti Toa	3.6 Indigenous ecosystems	Issue 3:	Decision requested: Iwi and landowner values-roles are not adequately recognised and provided for. These are two different matters and need to be decoupled on page 29. It would invite confusion to bring two matters in one phrase.	The separation of the values and roles of mana whenua and landowners and communities is made at the policy level.	
Table 6(a)						
S9.10	Hutt City Council	3.6 Indigenous ecosystems	Table 6(a):	Inconsistent use of 'mana whenua' and 'tangata whenua'. 'mana whenua' is used in the Objectives, but 'tangata whenua' is used in the methods. Decision requested: Amend for clarity	Noted and addressed across document	
Objective 16						
S16.8	Kāpiti Coast District Council	3.6 Indigenous ecosystems	Objective 16:	Oppose: The suggested protection of ecosystems that make a significant contribution to climate change and mitigation and/or adaptation is not supported by the Act or any existing higher-level statutory planning document. We consider that non- regulatory methods are the only avenue under the existing planning regime, and that GWRC should focus on incentives to achieve the objective rather than regulation. Decision requested: Delete proposed change to Objective 16 and rely on Objective 16A, Policy IE.4 and method IE.2 of deliver the non-statutory approach to achieving the desired outcomes.	Amended to remove climate change – addressed through NbS provisions	**Objective 16** Indigenous ecosystems and habitats with significant <u>ecosystem functions and services and/or</u> biodiversity values are ~~maintained~~ <u>protected, enhanced,</u> and restored to a healthy functioning state.
S23.25	Ātiawa ki Whakarongotai Charitable Trust	3.6 Indigenous ecosystems	Objective 16:	The Trust supports the amendment made to Objective 16. The Trust would like to be involved in any process that identifies significant sites to ensure that mana whenua are part of decision-making that could involve land held by Māori.	Noted. Added mana whenua to range of Methods that involve identifying significant sites e.g Method 32, Method IE.3 (systematic conservation planning) Method CC.6 (identifying nature-based solutions)	
S18.3	Waka Kotahi	3.6 Indigenous ecosystems	Objective 16:	Retain 'maintained' to be consistent with wording in Objective 16A Decision requested: Indigenous ecosystems and habitats with significant ecosystem and/or biodiversity values, including those that make a significant contribution to climate change mitigation and/or adaptation, are maintained protected and restored to a healthy functioning state.	Protect significant sites is consistent with RMA s6 and existing Policy 24 - retain	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
S20.12	South Wairarapa District Council	3.6 Indigenous ecosystems	Objective 16:	Uncertain as to the need of the inclusion of the climate change aspect in the Objective. Matters relating to climate mitigation should be dealt with by the CC objectives, effects of climate on IE's and IB are more appropriately dealt with here.	Amended	
S9.11	Hutt City Council	3.6 Indigenous ecosystems	Objective 16:	Decision requested: Unclear what the implications are of this i.e. does this go beyond just the identification of SNAs? Are 'those that make a significant contribution to climate change mitigation and/or adaptation' different or more wide-ranging than what is currently identified?	Amended	
Objective 16A						
S16.9	Kāpiti Coast District Council	3.6 Indigenous ecosystems	Objective 16A:	Support in part: We note the methods to achieve Objective 16A appear to be non-regulatory for city and district councils. We support the non-regulatory approach. We note the RMA and higher-level statutory planning documents do not enable a regulatory approach within a district plan that requires ecological restoration. We note the potential use of restoration as a method to avoid, remedy or mitigate adverse effects is already provided for on a case-by-basis for resource consents under section 108(2)(c) of the Act. We note any methods to give effect to mana whenua roles and values in managing indigenous biodiversity will need to be established via formal agreements clearly specifying roles, responsibilities, processes, and delegated powers to avoid situations where third party agreement is required in the resource consent process. Decision requested: Retain non-regulatory approach to achieving the proposed objective. Provide policy guidance that city and district councils are required to have particular regard to when considering relevant resource consents to provide guidance on when it would be appropriate to place conditions on resource consent under section 108(2)(c) of the Act (on the assumption the purpose of the condition falls under section 31 of the Act).	Retained non-reg approach	**Objective 16A** The region's indigenous ecosystems are maintained, enhanced, and restored to a healthy functioning state, increasing their resilience to increasing environmental pressures, and giving effect to *Te Rito o Te Harakeke*.
S23.26	Ātiawa ki Whakarongotai Charitable Trust	3.6 Indigenous ecosystems	Objective 16A:	The Trust supports in part the inclusion of Objective 16A with the following amendments (see adjacent column). The amendments sought by the Trust clarify the intent and outcome of the Objective. The current drafting sets out that only restoration efforts are required, this does not acknowledge the various states of different environments and the range of actions required. Decision requested: Objective 16A The ecosystem health, ecological integrity and ecological connectivity of the region's indigenous ecosystems, and the ecological processes that support them, are ~~maintained and restored~~ **enhanced, maintained and restored, so that** indigenous biodiversity and mahinga kai is thriving and is resilient to the effects of climate change.	Added enhanced	
S20.13	South Wairarapa District Council	3.6 Indigenous ecosystems	Objective 16A:	Support in principle. Enhancement/restoration requirements should be equitable between urban and rural environments and communities.	Agree	
S9.12	Hutt City Council	3.6 Indigenous ecosystems	Objective 16A:	The drafting of this is confusing. There are too many concepts bundled together and some of this reads more as a policy. The last part re: inidigenous biodiversity and mahinga kai reads like an 'add on'. What does 'thriving' indigenous biodiversity and mahinga kai look like? This needs to	Drafting simplified	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				be more specific. Is this intended to be the outcome that is sought from this objective? And is the policy then about 'maintaining and restoring' ecological integrity and ecological connectivity? Decision requested: Depending on what the focus of the objective is intended to be, this objective may be better crafted as follows: 'The region's Indigenous biodiversity and mahinga kai is restored, extended, and resilient to the effects of climate change.' Then the subsequent policies should deal with the 'how' - i.e. maintaining and restoring ecosystem health (ecological integrity and ecological connectivity).		
Objective 16B:						
S12.015	Ngā Hapū o Ōtaki	3.6 Indigenous ecosystems	Objective 16B:	(Ngā Hapū o Ōtaki support this wording and ask that GW hold strong to keeping these words and upholding their intention) Decision requested: Mana Whenua values relating to indigenous biodiversity, particularly endemic species and the important relationship between indigenous ecosystem health and cultural well-being, **recognise and provide for** ~~aregiven effect to in~~ decision-making and the roles of mana whenua as kaitiaki are supported and resourced.	Give effect to is stronger RMA plan wording than recognize and provide for	**Objective 16B** Mana whenua / tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making, and mana whenua / tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity.
S23.27	Ātiawa ki Whakarongotai Charitable Trust	3.6 Indigenous ecosystems	Objective 16B:	The Trust support the inclusion of Objective 16B, with the following amendments (see adjacent column). The Trust would like wording that is consistent with the Te Ātiawa ki Whakarongotai Kaitiakitanga Plan, that acknowledges that mana whenua exercise kaitiakitanga on behalf of its people, rather than a role that mana whenua have. Decision requested: Placeholder Objective 16B Mana Whenua values relating to indigenous biodiversity, particularly endemic species and the important relationship between indigenous ecosystem health and cultural well-being, are given effect to in decision-making and ~~the roles of~~ mana whenua **are enabled to exercise their kaitiakitanga through adequate support and resourcing** ~~as kaitiaki are supported and resourced~~.	Amended	
S10.014	Wairarapa Iwi	3.6 Indigenous ecosystems	Objective 16B:	Decision requested: potentially problematic to say "supported and resourced' - need to think about how this wording could be better and how it might link to the integrated management provisions (and check against language of WIP recc 1)	Noted	
S20.14	South Wairarapa District Council	3.6 Indigenous ecosystems	Objective 16B:	Support for mana whenua values being given effect to in decision making. More specific detail about how this is to be resourced and by whom would be beneficial.	Support noted Resourcing not a matter for the objective	
S14.013	Ngāti Toa	3.6 Indigenous ecosystems	Objective 16B:	Decision requested: Objective 16B is supported specifically *recognising Mana Whenua values relating to indigenous biodiversity and these values are given effect to in decision-making and the roles of mana whenua as kaitiaki are supported and resourced.* The use of Policy IE.2 and Policy IE.3 is also fundamental to achieve this objective.	Support noted	
Objective 16C:						

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
S16.10	Kāpiti Coast District Council	3.6 Indigenous ecosystems	Objective 16C:	We support greater recognition of the stewardship role landowners and the community play in relation to the maintenance and restoration for indigenous biodiversity. Decision requested: Retain the non-regulatory methods to support and recognise the stewardship role provided by the community and landowners.	Noted	**Objective 16C** Landowner and community values in relation to indigenous biodiversity are recognised and provided for and their roles as stewards are supported.
S20.15	South Wairarapa District Council	3.6 Indigenous ecosystems	Objective 16C:	Difficult to see how landowner and community values are reconciled in terms of indigenous biodiversity management as they relate to kaitiaki or stewardship values only. This has the potential to alienate some land owners and reduce the value of the process.	Noted	
Policy 23						
S12.037	Ngā Hapū o Ōtaki	4.1 Regulatory policies	Policy 23:	Decision requested: District and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values **and mahinga kai** by 30 June 2024; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:	Focus of Policy 23 is indigenous biodiversity Criteria (e) provides for tangata whenua values which incorporates mahinga kai as evidenced by listings in PNRP schedule C	**Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans** By 30 June 2025, ~~D~~district and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values: (a) Representativeness: the ecosystems or habitats that are typical and characteristic examples of the full range of the original or current natural diversity of ecosystem and habitat types in a district or in the region, and: (b) are no longer commonplace (less than about 30% remaining); or (c) are poorly represented in existing protected areas (less than about 20% legally protected). (d) Rarity: the ecosystem or habitat has biological or physical features that are scarce or threatened in a local, regional or national context. This can include individual species, rare and distinctive biological communities and physical features that are unusual or rare. (e) Diversity: the ecosystem or habitat has a natural diversity of ecological units, ecosystems, species and physical features within an area. (f) Ecological context of an area: the ecosystem or habitat: (g) enhances connectivity or otherwise buffers representative, rare or diverse indigenous ecosystems and habitats; or (h) provides seasonal or core habitat for protected or threatened indigenous species. (i) Mana whenua / tTangata whenua values: the ecosystem or habitat contains characteristics of special spiritual, historical or cultural significance to mana whenua / tangata whenua, identified in accordance with tikanga Māori. Explanation Policy 23 sets out criteria as guidance that must be considered in identifying indigenous *ecosystems* and *habitats* with significant *biodiversity* values. This evaluation is to be undertaken by 30 June 2025. Wellington Regional Council, and district and city councils are required to assess indigenous ecosystems and habitats against all the criteria but the relevance of each will depend on the individual cases. To be classed as having significant biodiversity values, an indigenous ecosystem or habitat must fit one or more of the listed criteria. Wellington Regional Council
S23.54	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 23:	The Trust support in part Policy 23. The Trust seek confirmation that any indigenous ecosystem and habitat with tangata whenua values (e) can be identified through means that does not require access to the site itself (i.e. digital mapping and aerial photography). The Trust are concerned that the wording in the explanation set out that access and use of any identified areas would be subject to landowner agreement, could exclude a site from being identified as significant under this policy. In addition, the Trust support that Regional Council have included a timeframe (30 June 2024) for such ecosystems and habitats to be identified. In addition, the Trust seeks further guidance on the approach that has been applied to RPS Change 1 to delete 'Explanations'. It appears that some explanations have been deleted and others have been retained, including the explanation for Policy 23. Decision requested: The Trust seek that the Explanation section of Policy 23 is deleted.	Policies are required to have explanations but explanations have been reviewed	
S20.33	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 23:	We prefer the latter date proposed by the NPS IB to identify SNA's as this will need to be included in the LTP, then carried out and reviewed which assumes available capacity for staff, ecologists and iwi.	Have extended date to 2025 as RPS has required this work since 2013, and RMA since 1991 IF NPS-IB gazetted can review as part of s42 reports.	
S19.14	Porirua City Council	4.1 Regulatory policies	Policy 23:	Support this policy being timebound in principle. Our PDP has given effect to it. However, the NPS-IB requires a first principles approach to SNA identification and protection which would make it challenging for any council to meet this. Timeframes should align with the NPS-IB.	NPS not gazetted – has no status and could be amended IF NPS-IB gazetted can review as part of s42 reports.	
S9.19	Hutt City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 23:	Concern that the RPS is setting a deadline for including SNAs in the District Plan that is much sooner than the deadline that is being proposed in the exposure draft of the NPS-IB. If the NPS-IB draft proceeds as drafted, there is a significant amount of engagement work to be undertaken before a plan change can be progressed. This will be challenging to progress before the 30 June 2024. The RPS must give effect to the NPS-IB, it is inappropriate for the RPS to set a different timeframe for implementation. Decision requested:	NPS not gazetted – has no status and could be amended IF NPS-IB gazetted can review as part of s42 reports.	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				Amend the deadline for including SNAs in District Plans to align with the timeframe set by the forthcoming NPS for Indigenous Biodiversity.		and district and city councils will need to engage directly with landowners and work collaboratively with them to identify areas, undertake field evaluation, and assess significance. Policy 23 will ensure that significant biodiversity values are identified in district and regional plans in a consistent way. Indigenous ecosystems and habitats can have additional values of significance to mana whenua / tangata whenua. There are a number of indigenous ecosystems and habitats across the region that are significant to tangata whenua for their ecological characteristics. These ecosystems will be considered for significance under this policy if they still exhibit the ecosystem functions which are considered significant by mana whenua / tangata whenua. Access and use of any identified areas would be subject to landowner agreement. Wellington Regional Council and district and city councils will need to partner engage directly with mana whenua / tangata whenua and work collaboratively with them and other stakeholders, including landowners, to identify areas under this criterion. Regional plans will identify indigenous ecosystems and habitats with significant biodiversity values in the coastal marine area, wetlands and the *beds* of lakes and rivers. District plans will identify indigenous ecosystems and habitats with significant biodiversity values for all land, except the coastal marine area and the *beds* of lakes and rivers.
S8.004	Carterton District Council	4.1 Regulatory policies	Policy 23:	Decision requested: Support SWDC comments on SNAs and indigenous biodiversity.	NPS not gazetted – has no status and could be amended IF NPS-IB gazetted can review as part of s42 reports.	
S14.029	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 23:	Policy 23 and Policy 24 identifying and protecting Significant Natural Areas (SNAs) are a critical part of the RPS. It is concerning these values to be identified by June 2024. Policy 23 and 24 have been in effect for a long time and is not ideal some Councils have not given effect to these Policies and / or gave effect partially, either to include just Public SNAs and leaving out the private land areas. It is crucial that councils that are tentatively holding space for these policies implement Policy 23 and 24 since District Plans to map, identify the SNAs, and undertake public consultation, and finally performing plan change to give effect to SNAs protection in the form of provisions are long processes that jeopardise the protection of SNAs. An important development that involves the implementation of Policy 23 and 24, is the Ministry for the Environment released the exposure draft for the National Policy Statement Indigenous Biodiversity (NPS-IB). This means there will be further policy implications to Regional Plan and District Plans. Since the exposure draft is accepting public submissions, it will be sometime for policies to take effect then to be implemented in Regional and District Plans. The intention of Policy 23 and 24 becomes more important where all Councils are about to give effect to National Policy Statement-Urban Development (NPS-UD) prioritising housing and development needs. It is critical that SNAs are provided protection in this uncertain environment where the Councils still to give effect to NPS-IB but will give effect to NPS-UD before National Policy Statement - Freshwater Management (NPS-FM) and NPS-IB start to take effect providing protection for our freshwater and indigenous ecosystems. Note that these NPSs are not synchronised, it is imperative Policy 23 and 24 ensures the Plan is given effect as soon as practicable.	Noted. Adding date to Policy 23 retained – but have extended to 2025 recognising need to arrange resourcing.	
Policy 24						
S23.55	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 24:	The Trust supports in part that Regional Council have included a timeframe (30 June 2024) for such ecosystems and habitats to be identified.	Support Noted	**Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans** By 30 June 2025, ~~D~~district and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development by 30 June 2025. Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall: (a) not provide for *biodiversity offsetting*: (b) where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or (c) when an activity is anticipated to causes residual adverse effects on an area after an offset has been implemented if the ecosystem or species is *threatened* or the ecosystem is *naturally uncommon;*
S20.34	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 24:	As above, the timeframe for the introduction of rules to protect SNA's is better reflected in the NPS IB exposure draft. However, it is unlikely that both 23 and 24 will be completed together. A further year to consult with landowners and mana whenua and development of a policy framework specific to the results of assessments would be expected as a minimum.	As above	
S19.15	Porirua City Council	4.1 Regulatory policies - direction to district and	Policy 24:	Support this policy being timebound in principle. Our PDP has given effect to it. However, the NPS-IB requires a first principles approach to SNA identification and protection which would make it challenging for any council to meet this. Timeframes should align with the NPS-IB.	As above	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
		regional plans and the Regional Land Transport Plan				(d) not provide for *biodiversity compensation* where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is *threatened* or the ecosystem is *naturally uncommon;* (e) ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to *biodiversity offsetting* and *biodiversity compensation*); (f) require that the outcome sought from the use of *biodiversity offsetting* is at least a 10 percent net biodiversity gain, or from *biodiversity compensation* is at least a 10 percent net biodiversity benefit.
S17.29	Masterton District Council	4.1 Regulatory policies	Policy 24:	This is currently being looked at as part of the WCDP review, as part of the NPS Indigenous Biodiversity.	Noted	
Policy IE.1						
S12.031	Ngā Hapū o Ōtaki	4.1 Regulatory policies	Policy IE.1	Decision requested: Offsetting and compensation to be done in consultation with mana whenua.	Noted	Policy removed.
S23.56	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies	Policy IE.1	In principle the Trust support the intent of Policy IE.1. The Trust requests that Table X of Appendix 1A be developed in partnership with mana whenua who hold mātauranga on indigenous ecosystems and species, rather than relying solely on what appears to be a western system of classification. The Trust also seeks reference to what sources Table X is derived from if it has already been developed.	Noted. Sources of information referenced in Appendix 1A	
S17.30	Masterton District Council	4.1 Regulatory policies	Policy IE.1	Need more information around what this entails and how significant ecosystems and habitats are identified. Would see biodiversity offsetting and compensation sitting with Regional Council not District due to expertise and core functions. How do we measure the biodiversity gain to ensure meeting target 10%? Decision requested: Remove District Councils from the Policy and retain at Regional level.	Requirement to apply the Effects management hierarchy applies to districts and regions	
S18.8	Waka Kotahi	4.1 Regulatory policies	Policy IE.1	Please clarify if this gives effect to the effects management hierarchy in 1.5 (4) in the NPS Indigenous Biodiversity exposure draft	Applies where an effects management hierarchy is provided for, consistent with that policy. Provision redrafted for clarity and incorporated into Policy 23	
S20.35	South Wairarapa District Council	4.1 Regulatory policies	Policy IE.1	Offsetting does not appear to be a required tool by the provision, but must avoid particular types and must have a 10% uplift. Are the exclusions realistic, does it effectively preclude all offsetting? The required amendments should reflect those proposed in the exposure draft of the NPB IB at the earliest. Otherwise, should generally align with the NPS IB.	Applies wherever offsetting and compensation are provided for. 10% uplift applies only to significant sites	
S19.16	Porirua City Council	4.1 Regulatory policies	Policy IE.1	We are unclear how this aligns with the matters in matters 3.10 (2)(a)-(e) of the NPS-IB which does not allow the effects management hierarchy to be applied to a broad range of effects.	Redrafted for better clarity as part of policy 24	
S16.18	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy IE.1	Oppose: Although these approaches are included in the latest exposure draft of the National Policy Statement for Indigenous Biodiversity, it is unknown whether they will be included in the final NPS, or if and when the NPS will be gazetted. Decision requested: Delete Policies IE.1, IE.2, and IE.3 and (where necessary) progress RPS amendments relating to indigenous biodiversity through a future Change process. Alternatively, amend the policies to focus only on non-regulatory methods with a focus on encouragement and support.	Noted	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
S10.013	Wairarapa Iwi	4.1 Regulatory policies	Policy IE.1	Decision requested: · IE:1 Concern around offsetting policies and cautioned around the use of these - Need to consider that naturalising a stream in one area may not be equivalent to the impacts of piping a stream in another. The word 'significant' should be removed. Consider that this is a risky clause. If the clause is left in - need to have Mana Whenua to be across the proposal acceptance, as they do not trust deals for offsetting.	Clause provides greater clarity as to what the existing "limits" are to the use of offsetting and compensation	
S14.031	Ngāti Toa	4.1 Regulatory policies	Policy IE.1	Decision requested: The clause (a) of this Policy, that the offsetting should not be applied if the species or ecosystems are threatened, or the ecosystem is uncommon is supported. It is unclear how the clause (b) come to the number 'at least 10%'. How do we identify the benefits of and understand the results of 10%? How do we make sure that the biodiversity compensation is adequate or enough to protect what we want to protect? Given that most of the species and ecosystems in Greater Wellington, in part, are limited, in danger or threatened, we are unsure the biodiversity value loss and gain can be in balance.	Support noted 10% uplift explained in s32 Appendix 1A identifies what those threatened species are in the Wellington Region	
S24.020	Wellington City Council	4.1 Regulatory policies	Policy IE.1	While we do have requirements for Biodiversity offsetting policies requiring a minimum no net loss, requiring a minimum of a 10% net gain or compensation is overly onerous on landowners and could possibly be more targeted to public land or public works Decision requested: Remove the at least 10% net biodiversity gain and 10% net biodiversity benefit	Note – applies to significant sites. Justification in s32	
Policy IE.2						
S12.032	Ngā Hapū o Ōtaki	4.1 Regulatory policies	Policy IE.2	Decision requested: (Very supportive of this)	Support noted	**Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – district and regional plans** District and regional plans shall include objectives, policies, methods and/or rules to partner with mana whenua / tangata whenua to: (a) apply mātauranga Māori frameworks, and support mana whenua to exercise their kaitiakitanga, in managing and monitoring indigenous biodiversity; (b) identify and protect taonga species; (c) support mana whenua / tangata whenua to access and exercise sustainable customary use of indigenous biodiversity, including for mahinga kai and taonga, in accordance with tikanga. Explanation Policy IE.1 directs regional and district plans to recognise and provide for Māori values for indigenous biodiversity, and for the role of mana whenua as kaitiaki in the region.
S12.038	Ngā Hapū o Ōtaki	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy IE.2	Decision requested: District and regional plans shall include objectives, policies and/or rules that enable, **support and resource** mana whenua to: (a) provide ~~a~~ mātauranga Māori framework**s** for the management and monitoring of indigenous biodiversity;	Use of the term 'support' across plan incorporates resourcing	
S23.57	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy IE.2	In principle the Trust supports Policy IE.2 as it enhances and enables mana whenua to carry out activities that uphold their mana. The Trust seeks the following changes to the policy (see adjacent column). The Trust does not consider it appropriate or necessary to limit the contribution of mana whenua to kaitiakitanga. The Trust's position is that mana whenua are enabled to participate in such matters as a result of our position as mana whenua, which is upheld through Te Tiriti, not just to provide for kaitiakitanga. Decision requested: Policy IE.2: Giving effect to mana whenua roles and values when managing indigenous biodiversity - district and regional plans District and regional plans shall include objectives, policies and/or rules that enable mana whenua to: (a) provide a mātauranga Māori framework for the management and monitoring of indigenous biodiversity; (b) **partner with district and regional councils** ~~be actively involved as kaitiaki~~ in planning, decision-making and monitoring of indigenous	Amended to address concerns	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				biodiversity in their rohe; and (c) access, and use, indigenous biodiversity, including for mahinga kai, according to tikanga.		
S17.31	Masterton District Council	4.1 Regulatory policies	Policy IE.2	Agree	Support noted	
S19.17	Porirua City Council	4.1 Regulatory policies	Policy IE.2	In regard to (b), this isn't fully a Plan matter. This is a governance and executive matter of how a council works and involves iwi. Need to reference other methods in the chapeau. Further, the NPS-IB gives detailed direction on engaging with Iwi/Māori with a first principles approach. This policy appears inconsistent with the NPS-IB.	Approach to partnering with iwi is not inconsistent with NPS-IB – can review and add further detail if needed as part of s42 if NPS- gazetted	
S16.19	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy IE.2	Oppose: We note including such provisions in the RPS before the existence of the necessary higher-level statutory planning direction will be difficult to justify under section 32 of the Act, particularly as the policies are suggesting regulatory methods. Decision requested: Delete Policies IE.1, IE.2, and IE.3 and (where necessary) progress RPS amendments relating to indigenous biodiversity through a future Change process. Alternatively, amend the policies to focus only on non-regulatory methods with a focus on encouragement and support.	Policy 24 already requires a regulatory response, reg approach for significant sites aligns with NPS-IB	
S20.36	South Wairarapa District Council	4.1 Regulatory policies	Policy IE.2	Support the enabling of maturanga Maori input into IB, decision making and monitoring, access and use. Property access required for monitoring may require a transfer of powers under the Act. We note that there are quite substantial increases in demands on mana whenua to implement the frameworks. What capacity building is required and who pays needs to be resolved.	Noted – support and resourcing matters will need to addressed with individual councils	
S14.032	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy IE.2	Decision requested: This policy is a pleasant improvement from the current framework that the RPS provides for. Clauses (a), (b), and (c) allows Mana Whenua to exercise their rights, and these clauses can be strengthened. District and regional plans can only provide a Mātauranga framework when iwi desires to share this framework as it applies to indigenous biodiversity. This clause to say: partner with iwi to apply a mātauranga Māori framework for the management and monitoring of indigenous biodiversity' would be better. Clause (b) should not say actively involve as Tangata Whenua holds the kaitiakitanga status; they will plan, decide, and monitor how indigenous biodiversity is tracking. Kaitiaki Monitoring Framework should be included here and be binding for District and Regional Plans. These Plans should spell out how the monitoring will be applied. Clause (c) is not clear whether the (c) is allowing Mana Whenua to access and use indigenous biodiversity. This could be reworded to say Mana Whenua has access and use rights, and District and Regional Plans should acknowledge these rights and set up processes to ensure that their access and use are not limited and restricted in any way.	Support noted Amendments made for clarification	
S24.021	Wellington City Council	4.1 Regulatory policies	Policy IE.2	The policy is unclear where we and how we should be enabling access and use as there is indigenous biodiversity on private land Decision requested: Clarification for IE.2(c) for where the access and use will be	Would need to be addressed by individual councils and their iwi partners	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
Policy 47						
S12.044	Ngā Hapū o Ōtaki	4.2 Regulatory policies - matters to be considered	Policy 47:	Decision requested: (b) providing adequate buffering around areas of significant indigenous ecosystems**, mahinga kai** and habitats from other land uses;	As noted above.	**Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values – consideration** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity values, and in determining whether the proposed activity is inappropriate particular regard shall be given to: (a) maintaining connections within, or corridors between, habitats of indigenous flora and fauna, and/or enhancing the connectivity between fragmented indigenous habitats; (b) providing adequate buffering around areas of significant indigenous ecosystems and habitats from other land uses; (c) managing wetlands for the purpose of aquatic ecosystem health, <u>recognising the wider benefits, such as for indigenous biodiversity, water quality and holding water in the landscape</u>; (d) avoiding the cumulative adverse effects of the incremental loss of indigenous ecosystems and habitats; (e) providing seasonal or core habitat for indigenous species; (f) protecting the life supporting capacity of indigenous ecosystems and habitats; (g) ~~remedying or mitigating~~ <u>minimising or remedying</u> adverse effects on the indigenous biodiversity values where avoiding adverse effects is not practicably achievable; ~~and~~ (h) the need for a precautionary approach when assessing the potential for adverse effects on indigenous ecosystems and habitats; (i) <u>the limits to, and expected outcomes from *biodiversity offsetting* and *biodiversity compensation* set out in Policy 24.</u>
S16.33	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy 47:	Oppose: Although these approaches are included in the latest exposure draft of the National Policy Statement for Indigenous Biodiversity, it is unknown whether they will be included in the final NPS, or if and when the NPS will be gazetted. We note including such provisions in the RPS before the existence of the necessary higher-level statutory planning direction will be difficult to justify under section 32 of the Act, particularly as the policies are suggesting regulatory methods. We suggest it would be more appropriate and efficient to await gazettal of the national policy statement on indigenous biodiversity before progressing amendments of this nature. Decision requested: Delete draft clauses (i) and (j) and (where necessary) progress RPS amendments relating to indigenous biodiversity through a future Change process., or alternatively make these non- regulatory to be provided for via encouragement.	Amendments are not dependent on the NPS-IB to proceed	
S23.80	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 47:	The Trust supports in part the amendments to Policy 47, the Trust seeks further amendments to provide for mana whenua values. In addition, the Trust suggests that the wording of subclause (j) be redrafted to set out what is to be achieved. The current wording is unhelpful and should be drafted to set out what is to be achieved/desired by Regional Council. Decision requested: (k) providing for mana whenua values associated with indigenous ecosystems and habitats (i) Ensuring that biodiversity offsetting is only applied where the ecosystem or species is not included in Table X of Appendix 1A~~not providing for biodiversity offsetting if the ecosystem or species is listed in Table X of Appendix 1A (Limits to biodiversity offsetting); and~~	Provided for in Policy 23 – identify tangata whenua values associated with indigenous biodiversity	
S20.55	South Wairarapa District Council	4.2 Regulatory policies	Policy 47:	Offsetting re limits - It would be preferable to understand to what extent the exclusions have in practice.	Address in s32	
S19.33	Porirua City Council	4.2 Regulatory policies	Policy 47:	We are unclear how this aligns with the matters in matters 3.10 (2)(a)-(e) of the NPS-IB which does not allow the effects management hierarchy to be applied to a broad range of effects.	Limits apply only where policy framework enables offsetting and /or compensation – redrafted for clarity	
Policy IE.3:						
S23.81	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy IE.3:	The Trust supports in part Policy IE.3. The Trust seeks that the word cultural is deleted. While mana whenua values associated with indigenous biodiversity (ecosystems and habitats) definitely provide for cultural well-being, referring only to cultural can narrow interpretation and lead plan users to assume that this is the only reason that indigenous biodiversity is of value to mana whenua. Mana whenua value indigenous biodiversity for a number of reasons, not only ways which is typically thought of as 'cultural' wellbeing. The Trust supports subclause (b) and (c). The Trust is pleased that Regional Council have acknowledge mātauranga Māori and mahinga kai.	Deleted cultural from Objective 16B and Policy IE.2	**Policy IE.2: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – consideration** <u>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, particular regard shall be given to enabling mana whenua / tangata whenua to exercise their roles as kaitiaki, including, but not restricted to:</u> (a) <u>providing for mana whenua values associated with indigenous biodiversity, including giving local effect to *Te Rito o te Harakeke*,</u>

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				Decision requested: Policy IE.3: Giving effect to mana whenua roles and values when managing indigenous biodiversity - consideration When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, particular regard shall be given to enabling mana whenua to exercise their ~~roles as~~ kaitiaki**tanga**, including: (a) recognising mana whenua values associated with indigenous biodiversity and their role in supporting ~~cultural~~ wellbeing; (b) incorporating the use of mātauranga Māori in the management and monitoring of indigenous biodiversity; and (c) enabling access, and use of, indigenous biodiversity, including for mahinga kai, according to tikanga.		(b) <u>incorporating the use of mātauranga Māori in the management and monitoring of indigenous biodiversity; and</u> (c) <u>supporting mana whenua / tangata whenua to access and exercise sustainable customary use of indigenous biodiversity, including for mahinga kai and taonga, in accordance with tikanga.</u> <u>Explanation</u> <u>Policy IE.2 requires consideration of enabling mana whenua / tangata whenua to exercise their kaitiakitanga in the region.</u>
S16.34	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy IE.3:	Oppose: We suggest it would be more appropriate and efficient to await gazettal of the national policy statement on indigenous biodiversity before progressing amendments of this nature. Decision requested: Delete Policies IE.1, IE.2, and IE.3 and (where necessary) progress RPS amendments relating to indigenous biodiversity through a future Change process. Alternatively, amend the policies to focus only on non-regulatory methods with a focus on encouragement and support.	As previous response	
S14.049	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy IE.3:	Decision requested: It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous biodiversity but not other parts of the Plan. Policy 49, in a way, explains it to extend the policy intention to fresh and coastal waters in the clause (b) and the exercise of kaitiakitanga in the clause (a) however this comes through as fragmented. The word 'recognised' can be strengthened, we suggest removing this wording and leave it with providing for.	Reflects the fact that this is only a partial review. Policy 49 still gives direction for other topics to recognise and provide for iwi values – requires full plan review to fully address	
S20.56	South Wairarapa District Council	4.2 Regulatory policies	Policy IE.3:	Generally support but note the comments on capacity and capability above. We note that mana whenua may wish to identify priorities (which may reflect particular settlements) rather than a blanket approach. Our preference is to engage with mana whenua to identify specific requirements from a planning framework rather than generically apply I.E 3 across the board.	Noted	
S19.34	Porirua City Council	4.2 Regulatory policies	Policy IE.3:	The NPS-IB gives detailed direction on engaging with Iwi/Māori with a first principles approach. This policy appears inconsistent with the NPS-IB.	Approach is not inconsistent. If gazetted can make changes through s42	
S17.48	Masterton District Council	4.2 Regulatory policies	Policy IE.3:	Does this relate to all subdivisions etc or just those taking place on land identified as having significant indigenous biodiversity values?	General provision – to TAs to discuss with mana whenua	
Policy 61						
S23.102	Ātiawa ki Whakarongotai Charitable Trust	4.3 Allocation of responsibilities	Policy 61:	The Trust supports the amendments to Policy 61.	Support noted	**Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity** Regional and district plans shall recognise and provide for the responsibilities below, when developing objectives, policies and methods, including rules, to maintain indigenous biodiversity:

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
						(a) Wellington Regional Council shall be responsible for developing objectives, policies, and methods in the regional policy statement for the control of the use of land to maintain indigenous ~~biological~~ biodiversity; (b) Wellington Regional Council shall be responsible for developing objectives, policies, rules and/or methods in regional plans for the control of the use of land to maintain and enhance ecosystems in water bodies and coastal water. This includes land within the coastal marine area, wetlands and the beds of lakes and rivers; and (c) city and district councils shall be responsible for developing objectives, policies, rules and/or methods in district plans for the control of the use of land for the maintenance of indigenous ~~biological~~ biodiversity. This excludes land within the coastal marine area and the beds of lakes and rivers~~.~~
Policy IE.4						
S16.51	Kāpiti Coast District Council	4.4 Non-regulatory policies	Policy IE.4:	Support in part: We note the methods to achieve Objective 16A appear to be non-regulatory for city and district councils. We support the non-regulatory approach. We note the RMA and higher-level statutory planning documents do not enable a regulatory approach within a district plan that requires ecological restoration. We note the potential use of restoration as a method to avoid, remedy or mitigate adverse effects is already provided for on a case-by-basis for resource consents under section 108(2)(c) of the Act. We note any methods to give effect to mana whenua roles and values in managing indigenous biodiversity will need to be established via formal agreements clearly specifying roles, responsibilities, processes, and delegated powers to avoid situations where third party agreement is required in the resource consent process. Decision requested: Retain non-regulatory approach to achieving the proposed objective. Provide policy guidance that city and district councils are required to have particular regard to when considering relevant resource consents to provide guidance on when it would be appropriate to place conditions on resource consent under section 108(2)(c) of the Act (on the assumption the purpose of the condition falls under section 31 of the Act).	Retained non-reg approach Policy redrafted for simplicity and detail added to Method IE.2: Maintaining and restoring indigenous ecosystems and habitats: systematic conservation planning	**Policy IE.3: Maintaining, enhancing, and restoring indigenous ecosystem health - non-regulatory** To *maintain, enhance* and *restore* the *ecosystem health*, *ecological integrity* and *ecological connectivity* of the region's indigenous ecosystems, and the ecological processes that support them, giving effect to Te Rito o te Harakeke, the Regional Policy Statement shall, as soon as practicable: (a) identify the characteristics required for the region's indigenous ecosystems to be in a healthy functioning state, including the processes that enable them to persist over the long-term, and (b) identify strategic targets and priorities to ensure that management and *restoration* of indigenous ecosystems and habitats (including pest management) are directed at areas where the greatest gains can be made for indigenous biodiversity. Where possible, priorities should also deliver benefits for *climate change mitigation* and/or *adaptation*, and freshwater; and (c) focus *restoration* efforts on achieving the strategic targets and priorities identified in (b). Explanation Policy IE.3 gives effect to Objective 16A by identifying the characteristics required for the region's indigenous ecosystems to be in a healthy functioning state, providing resilience to the impacts of increasing environmental pressures, and identifying strategic priorities and targets for restoration to ensure that regional conservation actions are applied efficiently, prioritising protection of the ecosystems and habitats of most pressing concern.
S23.107	Ātiawa ki Whakarongotai Charitable Trust	4.4 Non-regulatory policies	Policy IE.4:	The Trust supports in part Policy IE.4. The Trust seeks that mana whenua partner with Regional Council in both subclause (a) and (b). Mana whenua can provide mātauranga Māori that is essential to understanding and providing for ecological bottom-lines, ecosystem health, and ecological connectivity. In addition, mana whenua are often acutely aware of areas that would benefit from restoration efforts. Further, partnering with mana whenua upholds Te Tiriti and the responsibility of regional council to work with mana whenua to protect and provide for mana whenua values at all levels of resource management (governance, decision-making, through to practical actions/operational level). Decision requested: Policy IE.4: Maintaining and restoring indigenous ecosystems and habitats: identifying ecological bottom-lines, targets and priorities - non- regulatory	Amended to give effect to this method in partnership with mana whenua and detail added. to Method IE.2: Maintaining, enhancing and restoring indigenous ecosystems and habitats: systematic conservation planning	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				To maintain and restore the ecosystem health, ecological integrity and ecological connectivity of the region's indigenous ecosystems, and the ecological processes that support them, the Regional Policy Statement shall, by 31 December 2024 (a) **Partner with mana whenua to** identify the ecological bottom-lines needed to maintain the ecosystem health, ecological integrity, and ecological connectivity of the region's indigenous ecosystems and habitats, including the processes that enable them to persist over the long-term, and (b) **Partner with mana whenua to** identify strategic targets and priorities to ensure that management and restoration of indigenous ecosystems and habitats (including pest management) are directed at areas where the greatest gains can be made for indigenous biodiversity. Where possible, priorities should also deliver benefits for climate change mitigation and/or adaptation, and freshwater; and (c) focus restoration efforts on achieving ecological bottom-lines, targets and priorities**(d) supporting and resourcing mana whenua restoration of indigenous biodiversity.**		
S19.54	Porirua City Council	4.4 Non-regulatory policies	Policy IE.4:	How does this align with the NPS-IB requirements for regional councils?	Aligns with part of the requirement to develop a regional biodiversity strategy but explicitly requires a systematic conservation approach	
S20.74	South Wairarapa District Council	4.4 Non-regulatory policies	Policy IE.4:	Its hard to see how setting targets, bottom lines and priorities does not ultimately have a regulatory function, despite the policy being recognised as 'non-regulatory'. Support in principle but should be reframed as the development of a Local Indigenous Biodiversity Strategy type approach if the intent is not regulatory.	Reg approach used for protecting significant sites Non-reg, support to maintain enhance and restore elsewhere	
S10.012	Wairarapa Iwi	4.4 Non-regulatory policies	Policy IE.4:	Decision requested: · IE.4: It should be not just about bottom lines but about balancing. Bottom line is the min - need to be more aspirational than that; encourage ecosystem health in its fullest. Concern about whether we have the information to understand what is a bottom line	Revised to clarify outcome sought is healthy functioning ecosystem health not a minimal state	
Policy IE.5						
S12.047	Ngā Hapū o Ōtaki	4.4 Non-regulatory policies	Policy IE.5:	Decision requested: (a) involving landowners, **iwi,** and communities in the identification of targets and priorities for *protecting* and *restoring* indigenous biodiversity; (b) supporting and resourcing landowner, **iwi,** and community *restoration* of indigenous ecosystems.	Mana whenua specifically provided for in separate policy	**Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity – non-regulatory** Recognise and provide for the values of landowners and communities as stewards of the indigenous biodiversity of the Wellington Region, by: (a) involving communities in the identification of targets and priorities for protecting, enhancing and restoring indigenous biodiversity; and (b) supporting landowner and community restoration of indigenous ecosystems. Explanation Policy IE.4 recognises and provides for the important role that landowners and the community have as environmental stewards.
S19.55	Porirua City Council	4.4 Non-regulatory policies	Policy IE.5:	Support.	Support noted	
S20.75	South Wairarapa District Council	4.4 Non-regulatory policies	Policy IE.5:	We reiterate the comments for Objective 16C . (Difficult to see how landowner and community values are reconciled in terms of indigenous biodiversity management as they relate to kaitiaki or stewardship values only. This has the potential to alienate some land owners and reduce the value of the process.)	Noted	
Method IE.1						
S23.113	Ātiawa ki Whakarongotai Charitable Trust	4.5.2 Non-regulatory methods - information and guidance	Method IE.1:	The Trust seeks that Regional Council partners with mana whenua to develop an inventory of biodiversity offsetting and biodiversity compensation opportunities. Decision requested:	Amended to provide partnership	**New Method IE.2: Inventory of biodiversity offsetting and compensation opportunities** Partner with mana whenua / tangata whenua, and engage with interested parties to develop a regional inventory of opportunities for

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
				Method IE.1: Inventory of biodiversity offsetting and biodiversity compensation opportunities **In partnership with mana whenua their regional council shall** prepare, disseminate, and maintain a regional inventory of opportunities for biodiversity offsetting or biodiversity compensation for any residual adverse effects on indigenous ecosystems and habitats with significant indigenous biodiversity values. This inventory shall include identification of potential actions and areas: (a) for undertaking biodiversity offsetting or biodiversity compensation measures, prioritising those that contribute to achieving the ecological bottom-lines, targets and priorities (identified through Policy IE.4), and (b) that make a significant contribution to climate change mitigation and/or adaptation (identified through Method CC.7). Implementation: Wellington Regional Council*		<u>offsetting or compensating for any residual adverse effects on ecosystems and habitats with significant indigenous biodiversity values.</u> <u>*Implementation: Wellington Regional Council* and iwi authorities*</u>
S20.78	South Wairarapa District Council	4.5.2 Non-regulatory methods - information and guidance	Method IE.1:	Support regional leadership of identifying opportunities for biodiversity offsetting. However, it must be clear that this will be a consultation exercise for the communities to which they relate, mana whenua and TA's.	Amended	
S18.20	Waka Kotahi	4.5.2 Non-regulatory methods - information and guidance	Method IE.1:	Will the inventory of biodiversity offsetting and biodiversity compensation opportunities be a 'live' list to be added to (with GWRC agreement) over time?	Yes – reflected by use of word 'maintained'	
Method 21						
S23.117	Ātiawa ki Whakarongotai Charitable Trust	4.5.2 Non-regulatory methods - information and guidance	Method 21:	While the Trust supports the intent of Method 21, the Trust seek to partner with Regional Council in the development of a schedule of indigenous ecosystems and habitats with significant indigenous biodiversity values. This will ensure that mana whenua are included in the decision making process in regards to land that may be in Māori Customary Title, Māori Freehold land, or held by Māori. It also ensures mana whenua values are provided for in the development of the schedule.	A requirement of Policy 23 which sets out the criteria for identifying indigenous ecosystems and habitats as being significant (e) Tangata whenua values: the ecosystem or habitat contains characteristics of special spiritual, historical or cultural significance to tangata whenua, identified in accordance with tikanga Māori.	**Method 21: ~~Information to assist with the identification~~ <u>Identification and protection</u> of indigenous ecosystems and habitats with significant indigenous biodiversity values** <u>The regional council will liaise with the region's territorial authorities to ensure that all district plans include, by 30 June 2025 at the latest, a schedule of indigenous ecosystems and habitats with significant indigenous biodiversity values and plan provisions to protect them from inappropriate subdivision, use and development.</u> <u>Where a district-wide indigenous biodiversity assessment has not been initiated by 30 June 2024, the regional council will liaise with the territorial authority to agree on a programme of works and an understanding as to whether:</u> <u>(a) the territorial authority shall continue to have sole responsibility; or</u> <u>(b) the regional council shall take full responsibility; or</u> <u>(c) the territorial authority and the regional council shall share responsibilities.</u> ~~Prepare and disseminate information to assist with the interpretation of the criteria set out in policies 23 and 24, which require the identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values.~~ *Implementation: Wellington Regional Council* and city and district councils*
S12.013	Ngā Hapū o Ōtaki	4.5.2 Non-regulatory methods - information and guidance	Method 21:	Decision requested: Method 21: Information to assist with the identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity **and/or cultural** values **(e.g. mahinga kai)**	A requirement of Policy 23 which sets out the criteria for identifying indigenous ecosystems and habitats as being significant (e) Tangata whenua values: the ecosystem or habitat contains characteristics of special spiritual, historical or cultural significance to tangata whenua, identified in accordance with tikanga Māori.	
S20.82	South Wairarapa District Council	4.5.2 Non-regulatory methods - information and guidance	Method 21:	We reiterate our comments re alignment of timeframes with draft NPS IB as a minimum. Support the options to share or devolve responsibility. the timeframe proposed to identify and include SNA's in the DP is unnecessarily short given the LTP cycle, available expert resource and any consequential amendments required to a planning framework based on the results of the work. Support discussion around shared or devolved responsibility.	As previous response	
Method 32						
S23.121	Ātiawa ki Whakarongotai	4.5.3 Non-regulatory methods -	Method 32:	The Trust seeks that this method be separated into two distinct methods to clearly set out the expectation that a partnership will be applied to with whānau, marae, hapū and iwi to identify significant values, including mana whenua values.	Amended	Method 32: <u>Partnering</u> ~~Engagement~~ with mana whenua / tangata whenua, <u>and engaging with</u> stakeholders, landowners and the community in the identification and protection of significant values

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
	Charitable Trust	integrating management		Decision requested: Method 32: Partner with tangata whenua, ~~and engage with stakeholders, landowners and the community~~ in the identification and protection of significant values Partner with iwi, hapū, marae or whānau, ~~and engage with stakeholders, landowners and the community~~ to: (a) identify and protect of significant places, sites and areas with significant **mana whenua values** and historic heritage values; (b) identify and protect of outstanding natural features and landscapes, and managing the values of special amenity landscapes; (c) identify and protect of indigenous ecosystems and habitats with significant biodiversity values, **including those with mana whenua values;** (ca) set targets and priorities for protecting and restoring indigenous ecosystems and habitats; and (d) protect the values **including mana whenua values** associated with the rivers and lakes identified in Appendix 1.; and (e) identify nature-based solutions to climate change, **including those based on mātauranga Māori.** Implementation: Wellington Regional Council and city and district councils		~~Involve~~ Partner with iwi, hapū, marae or whānau, and engage with stakeholders, landowners and the community ~~in the~~ to: (a) identify~~ication~~ and protect~~ion of~~ significant places, sites and areas with significant cultural heritage values and significant historic heritage values; (b) identify~~ication~~ and protect~~ion of~~ outstanding natural features and landscapes, and managing the values of special amenity landscapes, including those with significant cultural values; (c) identify~~ication~~ and protect~~ion of~~ indigenous ecosystems and habitats with significant biodiversity values, including those of significance to mana whenua; (ca) set targets and priorities for *protecting, enhancing* and *restoring* indigenous biodiversity as described in Method IE.3; ~~and~~ (d) protect~~ion of~~ the values, including mana whenua values, associated with the rivers and lakes identified in Appendix 1.; and (e) identify *nature-based solutions* to climate change as described in Method CC.6. *Implementation: Wellington Regional Council and city and district councils*
S12.014	Ngā Hapū o Ōtaki	4.5.3 Non-regulatory methods - integrating management	Method 32:	Decision requested: Method 32: ~~Partner~~ **Reciprocal partnership** with tangata whenua, and engage with stakeholders, landowners and the community in the identification and protection of significant values Partner with iwi,hapū, marae or whānau, and engage with stakeholders, landowners and the community to: (a) identify and protect significant places, sites and areas **with significant cultural value as well as** historic heritage values; (b) identify and protect outstanding **culturally significant** natural features and landscapes, and managing the values of special amenity landscapes; (c) identify and protect indigenous ecosystems and habitats with significant biodiversity values; (ca) set targets and priorities for *protecting* and *restoring* indigenous ecosystems and habitats; and (d) protection of the values associated with the rivers, **wetlands,** ~~and~~lakes, **and dunes** identified in Appendix 1.;and	Amendments	
S20.89	South Wairarapa District Council	4.5.3 Non-regulatory methods - integrating management	Method 32:	support in part. Unclear as to why other parties cannot be 'partnered with'.	Partnership with mana whenua as treaty partners	
S10.030	Wairarapa Iwi	4.5.3 Non-regulatory methods - integrating management	Method 32:	Decision requested: · Need to re look at method 32 in relation to the new methods CC.7 and CC.8. Seems more out of date (Look through all three methods to address repetition and inconsistencies)	amended	
S14.067	Ngāti Toa	4.5.3 Non-regulatory	Method 32:	Decision requested:	amended	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
		methods - integrating management		The content covered in the Method 32 is supported, however it is not clear the intention of the drafting in some places, such as, 'engaging with stakeholders, landowners and community'. This method could emphasize 'co-design of actions, policies and implementation' -it is not an exercise just regarding sites of significance to iwi and Māori.		
Method IE.2						
S16.59	Kāpiti Coast District Council	4.5.4 Non-regulatory methods - identification and investigation	Method IE.2:	Support in part: We note the methods to achieve Objective 16A appear to be non-regulatory for city and district councils. We support the non-regulatory approach. We note the RMA and higher-level statutory planning documents do not enable a regulatory approach within a district plan that requires ecological restoration. We note the potential use of restoration as a method to avoid, remedy or mitigate adverse effects is already provided for on a case-by-basis for resource consents under section 108(2)(c) of the Act. We note any methods to give effect to mana whenua roles and values in managing indigenous biodiversity will need to be established via formal agreements clearly specifying roles, responsibilities, processes, and delegated powers to avoid situations where third party agreement is required in the resource consent process. Decision requested: Retain non-regulatory approach to achieving the proposed objective. Provide policy guidance that city and district councils are required to have particular regard to when considering relevant resource consents to provide guidance on when it would be appropriate to place conditions on resource consent under section 108(2)(c) of the Act (on the assumption the purpose of the condition falls under section 31 of the Act).	Retained as non-reg	**Method IE.3: Regional biodiversity strategy** Develop and implement, in partnership with mana whenua / tangata whenua and in collaboration with territorial authorities, communities and other stakeholders, a regional biodiversity strategy to maintain and restore indigenous biodiversity at a landscape scale, incorporating both Mātauranga Māori and systematic conservation planning. *Implementation: Wellington Regional Council*
S23.125	Ātiawa ki Whakarongotai Charitable Trust	4.5.4 Non-regulatory methods - identification and investigation	Method IE.2:	The Trust seeks further amendments to Method IE.2 to provide for a partnership approach with mana whenua to identify ecological bottom lines. Decision requested: Method IE.2: Identifying ecological bottom-lines, targets and priorities for protecting and restoring indigenous biodiversity By 31 December 2024, identify as required by Policy IE.4: (a) **in partnership with mana whenua** the ecological bottom-lines needed to maintain the ecosystem health, ecological integrity, and ecological connectivity of the region's indigenous ecosystems and habitats and, (b) in partnership with mana whenua and engaging with key stakeholders, a set of strategic targets and priorities to ensure that ecological protection and restoration (including pest management) is directed at areas where the greatest gains can be made for indigenous biodiversity. Where possible, priorities should also deliver benefits for climate change mitigation and adaptation (as identified through Method CC.7) and freshwater and coastal water. Implementation: Wellington Regional Council	Added in partnership with	
S20.93	South Wairarapa District Council	4.5.4 Non-regulatory methods - identification	Method IE.2:	Unclear how 'bottom lines' can be perceived as 'non-regulatory'. Concerns that arms length engagement will result in sub-optimal outcomes.	Regulatory approach to protect significant sites and non-reg to support restoration work to achieve healthy ecosystem state for other biodiversity	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
		and investigation				
Method 53						
S16.60	Kāpiti Coast District Council	4.5.5 Non-regulatory methods - providing support	Method 53:	We support the shift in focus of this method to include all indigenous ecosystem types rather than only those that are within the coastal environment, rivers, lakes and streams. Decision requested: Retain draft wording.	Support noted	**Method 53: Support <u>mana whenua / tangata whenua and community restoration initiatives for ~~the coastal environment, rivers, lakes and wetlands~~ indigenous ecosystems</u>** <u>Provide practical support for mana whenua / tangata whenua and community restoration initiatives for ~~the coastal environment, rivers, lakes and wetlands~~ indigenous ecosystems, with a focus on achieving the targets and priorities identified by Methods IE.2, CC.4 and CC.7.</u> *Implementation: Wellington Regional Council and city and district councils*
S23.127	Ātiawa ki Whakarongotai Charitable Trust	4.5.5 Non-regulatory methods - providing support	Method 53:	New Method 53A: The Trust seeks the inclusion of New Method 53A Decision requested: **Method 53A: Support mana whenua restoration initiatives for indigenous ecosystems** **Provide practical support to mana whenua restoration initiatives for indigenous ecosystems, with a focus on achieving the ecological bottom-lines, targets and priorities identified by Policy IE.4, and being informed by mana whenua values.**	Added specific recognition for support for mana whenua restoration initiatives to Method 53	
S12.016	Ngā Hapū o Ōtaki	4.5.5 Non-regulatory methods - providing support	Method 53:	Decision requested: Method 53: Support community restoration initiatives**by mana whenua** for the coastal environment, rivers lakes and wetlands indigenous ecosystems **within their rohe/region**	Added specific recognition for support for mana whenua restoration initiatives to Method 53	
Method 54						
S12.049	Ngā Hapū o Ōtaki	4.5.5 Non-regulatory methods - providing support	Method 54:	Decision requested: Method 54: Assist landowners **iwi, and community groups** to maintain, enhance and restore indigenous ecosystems	Specifically provided for by Method 53 Method 54 applies to all landowners wanting to carry out restoration on private land – all encompassing	**Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems** Assist landowners to maintain, enhance and/or restore indigenous ecosystems<u>, with a focus on achieving the targets and priorities identified by Methods IE.2 and CC.7,</u> including by, but not limited to: (a) assisting with the costs of legally protecting indigenous ecosystems by way of open space covenants with Queen Elizabeth the Second National Trust (QEII); (b) <u>considering opportunities for rates rebates;</u> (c) assisting with the costs of controlling pest plants and animals; and (d) supporting landowners to restore significant indigenous ecosystems by fencing and planting. *Implementation: Wellington Regional Council and city and district councils*
Method IE.3						
S12.055	Ngā Hapū o Ōtaki	4.5.5 Non-regulatory methods - providing support	Method IE.3:	Decision requested: Support mana whenua to establish ~~a~~ mana whenua kaitiaki programme**s** to monitor **and evaluate** the health **trends** of the region's indigenous biodiversity.	Added	**Method IE.4: Kaitiaki indigenous biodiversity monitoring programme** <u>Work in partnership with mana whenua / tangata whenua to establish and resource kaitiaki programmes to:</u> <u>(a) monitor and evaluate the ecosystem health and trends of the region's indigenous biodiversity and the extent to which *Te Rito o te Harakeke* is being given effect to, and</u> <u>(b) develop action plans to respond to the monitoring results, including informing the identification of targets and priorities through Method IE.3.</u> *<u>Implementation: Wellington Regional Council</u>*
S23.128	Ātiawa ki Whakarongotai Charitable Trust	4.5.5 Non-regulatory methods - providing support	Method IE.3:	The Trust supports Method IE.3. The Trust has aspirations to develop and grow our kaitiaki monitoring programme and are very keen to work with Regional Council to explore this particular method.	Support noted	
S12.017	Ngā Hapū o Ōtaki	4.5.5 Non-regulatory methods - providing support	Method IE.3:	Decision requested: Method IE.3: **Resource k**Kaitiaki indigenous biodiversity monitoring programme**s**	Added	

Submission Point	Submitter	Section	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
S14.071	Ngāti Toa	4.5.5 Non-regulatory methods - providing support	Method IE.3:	Decision requested: This is connected throughout the plan; kaitiaki monitoring is not intended just for biodiversity; the theme needs to spread throughout all areas of taiao. It has not been consistently applied the same language provided here in this method as it needs to be coming across all the RPS. The word 'support' mana whenua can be redrafted to say, 'ensure Mana Whenua has sufficient resources to establish a mana whenua kaitiaki monitoring programme to monitor the health of the region's indigenous biodiversity.' Note that comments made above, the kaitiaki monitoring does not just apply to indigenous biodiversity and the method should speak to how this is incorporated to the GWRC monitoring frameworks.	Will need to be part of full RPS review in 2024	
Definitions						
S23.131	Ātiawa ki Whakarongotai Charitable Trust	Appendix 3: Definitions	Enhancement (in relation to indigenous biodiversity)	The Trust seeks further amendment to this definition. The Trust seeks the proposed deletion as returning an environment to its former state in some instances is an appropriate scale of improvement. The proposed wording is not very aspirational and could be interpreted as any improvement is considered adequate. The Trust notes that it may not be practicable to return all environments to their former state but this should not be excluded in all instances. Decision requested: The active intervention and management of modified or degraded habitats, ecosystems, landforms and landscapes in order to reinstate indigenous natural character, ecological and physical processes, and cultural and visual qualities. The aim of enhancement actions is to improve the condition of the environment, ~~but not to return it to a former state.~~	Amendment clarifies the difference between enhancement and restoration – retain as drafted	

Integrated management

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
General						
S16.1	Kāpiti Coast District Council	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	3	3. Overarching resource management issues for the Wellington Region (page 2) Oppose: We note clause 1 reads very negatively. It is unclear whether this statement is based on a state of the environment report, plan implementation monitoring or other evidence base, or whether it is an opinion. General RPS-wide issue regarding the use of the terms iwi/ iwi authorities/ mana whenua/ tangata whenua/ hapū/ whānau/ marae across the current and now proposed wording in the RPS. Oppose and seek amendment: We seek care be applied in the use of these terms across the RPS (including but not limited to the amendments through Change 1). Unnecessary inconsistency in use of these terms not only causes issues for territorial authorities, but may also unhelpfully complicate matters for iwi authorities due to the changing requirements depending upon the topic being discussed. Incorrect use of these terms can also set up expectations of consultation/involvement where people/groups are not given that role by the RMA or relevant statutory planning document. Decision requested: 3. Overarching resource management issues for the Wellington Region (page 2) Oppose: Insert references to the evidence base that supports the statement about inappropriate and poorly managed land use of the environment. If this is an opinion, we seek it be deleted.	The 3 whaitua have been very clear that the integrated management of natural resources has been done poorly especially across regional and territorial boundaries resulting in lack of holistic approach and degradation of natural resources. Insert our environmental reporting and investigation reports in s32, as well as references to the WIPs.	

				General RPS-wide issue regarding the use of the terms iwi/ iwi authorities/ mana whenua/ tangata whenua/ hapū/ whānau/ marae across the current and now proposed wording in the RPS. Oppose and seek amendment: Review, and as necessary correct, all terms iwi/ iwi authorities/ mana whenua/ tangata whenua/ hapū/ whānau/ marae across the current proposed wording in the RPS to reduce any unwarranted variation, and to ensure the correct term is used consistent with the RMA and relevant higher-level statutory planning documents.		
S23.133	Ātiawa ki Whakaron gotai Charitable Trust	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	3	Decision requested: The Trust supports an integrated approach to resource management. The concept of integrated management aligns with te tirohanga Māori/Māori worldview of understanding te ao Tūroa, the natural world as an interconnected, interdependent whole. These provisions enable mana whenua values and provide for mātauranga to be applied to resource management.	Noted	
Overarching Issue 1						
S23.2	Ātiawa ki Whakaron gotai Charitable Trust	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1:	The Trust support in part Overarching Issue 1 as this sets out the key issues in a holistic manner, both existing problems and potential future problems. The Trust seeks reference to the impact of inappropriate and poorly managed use of the environment on mana whenua. Decision requested: 1. Inappropriate and poorly managed use of the environment, including both urban and rural activities, have damaged and continue to jeopardise the natural environment, destroying ecosystems, degrading water, **adversely impacting the relationship between mana whenua and the taiao**, and leaving communities and nature increasingly exposed to the impacts of climate change. Projected population growth and future development will place additional pressure on the natural environment.	Suggested wording included in redraft.	The overarching resource management issues for the Wellington Region are: (a) Adverse impacts on natural environments and communities (b) Inappropriate and poorly managed use and development of the environment, including both urban and rural activities, have damaged and continue to impact the natural environment, increase greenhouse gas emissions, destroying ecosystems, degrading water, adversely impacting the relationship between mana whenua and the taiao, and leaving communities and nature increasingly exposed to the impacts of climate change.
S24.001	Wellington City Council	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1:	This issue is focused on damage and jeopardising the natural environment, and is silent about the built environment. The RMA section 59 requires the RPS to look at integrated management of natural and physical resources for the region, not just protecting natural processes. It also ignores the NPS-UD objectives. Decision requested: Either add an overarching RM issue for the built environment, or delete the "overarching issues" altogether. They are not common in other RPSs, and risk being too waffly to have much effect or being superseded by RMA and national direction in Plan interpretation.	'Built environment' incorporated	
S19.1	Porirua City Council	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the	Overarching Issue 1:	PCC supports the attention to the natural environment within this issue. However, we are concerned with the lack of attention to the built environment. For example, lack of housing is not included. This is articulated in the regional, form, design and function section. Are there many examples of ecosystems being destroyed? Are there any recent examples? This issue is expressed as a broad and strong statement and does not acknowledge many improvements that are being made throughout various catchments in Wellington. For example, in Porirua, urban tree canopy has increased in Porirua decade on decade with urban development of rural	Overarching issue reviewed and redrafted	

		Regional Policy Statement		landscapes. There will be further improvements with the rezoning of greenfield areas, and the ongoing implementation of catchment management strategies. Decision requested: We recommended a review of the over-arching issues and objectives to ensure that they address the breadth of significant natural and built environment issues and outcomes within the scope of the RPS.		
S9.1	Hutt City Council	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 1:	While the issue statement correctly highlights that these activities have degraded the natural environment, it incorrectly suggests that all urban and rural activities, particularly future urban activites, have negative impacts. The undertone is that development should be prevented. There is no recognition that urban development must continue to provide for population growth and change, or that urban development practices will need to be adpated to better manage impacts on the natural environment. Some additional wording is required to provide a more balanced and well-rounded issue statement. The Overarching Issues shouldn't be specific to the issues with current development practices. The should relate to general issues with development. Decision requested: Inappropriate and poorly managed use of the environment, including both urban and rural activities, ~~have~~ **can** damage~~d~~ and ~~continue to~~ jeopardise the natural environment, destroying ecosystems, degrading water, and leaving communities and nature increasingly exposed to the impacts of climate change. ~~Projected population growth and future development will place additional pressure on the natural environment~~. **The Region is expecting significant population growth over the next 30 years which must be provided for through future urban development. Changes are needed in how urban development is managed and undertaken in the Region to ensure that impacts on the natural environment are minmised.**	Suggested wording not reflected; it is not framed as an objective. Also, direction from Council was to use strong words ('have damaged and continue to jeopardise') to express the seriousness of the degradation that continues to occur. Added references to built environment and population growth pressure on housing and infrastructure.	
Overarching Issue 2						
S12.003	Ngā Hapū o Ōtaki	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 2:	(NB: Ngā Hapū o Ōtaki support this statement and we anticipate wider community concerns will be submitted during the consultation period. However we ask that GW ensures this statement or a similar statement to this intent remains within the RPS.)	Noted	Increasing pressure on housing and infrastructure capacity Population growth is putting pressure on housing and infrastructure capacity. To meet the needs of current and future populations, development will place additional pressure on the natural and built environments. Lack of mana whenua / tangata whenua involvement in decision making Mana whenua / tangata whenua values, Te Ao Māori and mātauranga Māori have not been given sufficient weight in decision-making, including from governance level through to the implementation. As a result, mana whenua / tangata whenua values have not been adequately provided for in resource management, causing disconnection between mana whenua / tangata whenua and the environment.
S23.3	Ātiawa ki Whakarongotai Charitable Trust	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 2:	In principle the Trust supports in part the inclusion of Overarching Issue 2. The Trust suggests that provision 3.2 could be strengthened by stating the effect that the issue has had on the environment, similar to how Overarching Issue 2 is phrased. Currently as it stands provision 3.2 is an issue statement that lack the explanation of what occurs as a result of this issue. Decision requested: 2. **Mana whenua values**, te ao Māori and mātauranga Māori have not been given sufficient weight in decision- making, including from governance through to implementation. **As a result, mana whenua values have not been adequately provided for in resource management, causing disconnection between mana whenua and the environment.**	Suggested wording included	
S18.025	Waka Kotahi	3 Resource management	Overarching Issue 2:	Decision requested:	Included GHG emissions	

		issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement		Include 'carbon emissions' to regionally significant issues and issues of significance B: Inappropriate and poorly managed urban land use and activities in the Wellington region have damaged, and continue jeopardize, the natural environment, **increase carbon emissions**, degrade ecosystems, particularly aquatic ecosystems, and increase the exposure of communities to the impacts of climate change.		
S19.2	Porirua City Council	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 2:	PCC supports the attention to the natural environment within this issue. However, we are concerned with the lack of attention to the built environment. For example, lack of housing is not included. This is articulated in the regional, form, design and function section. Decision requested: Suggest the following wording: The management of the regions natural and physical resources has not adequately reflected and incorporated Te Ao Māori and Mātauranga Māori.	Suggested wording not included however the amendments somewhat reflect the intent of the recommended wording.	
S9.2	Hutt City Council	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Issue 2:	The purpose of including overarching issues is presumably to provide a more integrated approach across the range of regional resource management issues in the RPS and subordinate planning documents. As such, it is important that all relevant issues are visible in this overarching section. As drafted, they are not. An additional Overarching issue should be included in relation to the urban environment which covers housing, transport and infrastructure issues that the region is facing, particularly in the metropolitan area. These issues are well canvassed at a national level and housing in particular is the driver of the NPS-UD and the regional council has obligations under this national direction alongside other national direction instruments. Given the primary purpose of this RPS change is to give effect to the NPS-UD it is unclear why urban development issues have not been highlighted as an overarching issue. Issue statements should describe environmental issues, not critiques of what is currently done at the time the RPS is written. Decision requested: If overarching issues are retained: - reframe the issue statements as general environmental issues, rather than critiques of current practice. - ensure issues relating to the urban environment are included - in particular housing, transport, infrastructure.	Issues raised addressed	
Overarching Objective A						
S12.004	Ngā Hapū o Ōtaki	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A:	Decision requested: Objective A: Integrated and respectful environmental stewardship that embraces Te Ao Māori and prioritises the health of the natural environment in a way that: (a) incorporates Mātauranga Māori alongside other diverse knowledge and evidence**(b) supports and resources mana whenua to adequately contribute as a reciprocal partner** (c) recognises ki uta ki tai - the holistic nature and interconnectedness of all parts of the natural environment (d) protects and enhances **mahinga kai and** the life-supporting capacity of ecosystems (e) recognises the dependence of humans on a healthy natural environment (f) responds effectively to future pressures, including climate change, population growth and development.	Included mahinga kai in (c) Not included the suggested wording (b). The 'resourcing and support' are appropriately included in a range of policies and methods, rather than in an objective, to ensure our partners are adequately resourced and supported. In the RMA language 'resourcing' is implicit in 'support'.	**Objective A**: Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (a) incorporates mātauranga Māori; and (b) recognises ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and (c) protects and enhances mana whenua / tangata whenua values, in particular mahinga kai, and the life-supporting capacity of ecosystems; and (d) recognises the dependence of humans on a healthy natural environment; and (e) recognises the role of both natural and physical resources in providing for the characteristics and qualities of well-functioning urban environments; and

	Wairarapa iwi			Decision requested: Wairarapa iwi – sought that mātauranga Māori is distinct from "other diverse knowledge', and to remove "other diverse knowledge' from (a). Mātauranga Māori should be elevated on its own, and not bundled with all the other knowledge.	Amended	(f) responds effectively to the current and future pressures of climate change, population growth and development. ~~t~~The objectives sought to be achieved and ~~provides~~ a summary of the policies and methods to achieve the objectives~~. These~~ are presented under the following topic headings: • Air quality • Climate change • 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 or have been identified as issues of significance to the Wellington region's iwi authorities. Each 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.
S23.4	Ātiawa ki Whakarongotai Charitable Trust	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A:	The Trust supports the inclusion of Objective A. Objective A strengthens the position of te ao Māori, including mana whenua and mātauranga Māori in resource management. The Trust recognises the importance of this provision as it sets out what is to be achieved in the region and demonstrates to plan users that at the highest level te ao Māori must be embraced and provided for. The Trust acknowledges that Objective A provides for Overarching Issue 1 and 2.	Noted	
S17.1	Masterton District Council	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A:	Agree - but need clarity on how (a) and (b) will be incorporated. Decision requested: Further clarity on how this will be incorporated	Noted	
S24.002	Wellington City Council	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A:	This objective is about the natural environment only, and does not encompass the purpose of what a regional policy statement should do. Decision requested: It needs to be expanded to encompass the physical/built environment as well, with a positive statement about building well-functional urban environments into the future. Alternatively, delete the "overarching objective" altogether. They are not common in other RPSs, and risk being too waffly to have much effect or being superseded by RMA and national direction in Plan interpretation.	Issues addressed	
S19.3	Porirua City Council	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A:	What about people and communities? This needs to include a clause that reflects people and communities and their economic, cultural and social health and wellbeing. Otherwise, it's not providing sufficient balance as an overarching objective and doesn't give effect to section 5. Decision requested: This needs to include a clause that reflects people and communities and their economic, cultural and social health and wellbeing.	It is implicit in (e)	
S25.001	Wellington Water	3 Resource management issues, objectives and summary of policies and methods to achieve the	Overarching Objective A:	Decision requested: The issue needs to explicitly recognise that this is a paradigm shift for resource management in Wellington and set out how that paradigm shift will be achieved through RMA documents and processes. Consistent with Te Mana o te Wai, it might benefit from an expectation for everyone to play their roel? It might need a supporting policy immediately underneath it.	There is a policy supporting the objective.	

		objectives in the Regional Policy Statement				
S9.3	Hutt City Council	3.1 Climate Change	Overarching Objective A:	Similar to comments above, if this Objective is about 'integrated management' there should be much greater recognition of the role of the urban/physical environment. This is alluded to in clause (e), but this only in terms of it being a 'pressure' and the policy direction is 'responds effectively to'. Again, this Objective could be enhanced by providing more balance to the issue of urban development which is an inevitable part of the Region's future and is part of an integrated management approach. Urban development also has positive effects and is an inherent part of providing for people's economic, social, and cultural needs. Decision requested: Amend as follows: Objective A: Integrated and respectful environmental stewardship that embraces Te Ao Māori and prioritises the health of the natural environment in a way that: (a) incorporates Mātauranga Māori alongside other diverse knowledge and evidence (b) recognises ki uta ki tai - the holistic nature and interconnectedness of all parts of the natural environment (c) protects and enhances the life-supporting capacity of ecosystems (d) recognises the dependence of humans on a healthy natural environment (e) responds effectively to future pressures, including climate change, population growth and development. **(f) recognises the role of both natural and physical resources in supporting well-functioning urban environments.**	Suggested wording (f) included	
S14.002	Ngāti Toa	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement	Overarching Objective A:	Decision requested: Objective 3 (2) uses the phrase 'Te Ao Māori and Mātauranga Māori' have not been given sufficient weight in decision-making'. This phrase cane reworded to say: 'Te Ao Māori and Mātauranga Māori' have been given limited and in some cases no weight from the governance level through the implementation. It is encouraging to seethe value of mātauranga Māori being recognised in the Objective 3 A (a). It seems this objective only recognises mātauranga as a knowledge system with evidence. The Objective 3 A (a) can be improved to recognise the resource management methodologies within mātauranga. We recommend that there is more recognition of the significant role that Māori have of kaitiakitanga, the obligation of care and protection for the environment, and the importance for Māori to have the ability to carry out this role. Objective A mentions 'integrated and respectful environmental stewardship'. Does the reference to stewardship is written to mean the Crown? If this means to say kaitiakitanga, the text needs to be clear separating these. Objectives from (a) to (e) do not mention how Objective A will be implemented with Mana Whenua; an additional clause (f)could be inserted and could mean to say: *co-designs with Mana Whenua and iwi how Te Ao Māori and Mātauranga will be used, and responds to Mana Whenua and iwi principles and values and aspirations delivering environmental outcomes*. Objective A(e) aims to respond effectively to pressures such as, climate change. However, these are not only future pressures but pressures we currently experience. We recommend rewording this objective as to read 'responds effectively to the current and future pressures of climate change, population growth and development.'	Suggested wording (f) not included. The proposed wording is more suitable for a policy. A couple of policies and a method capture the intent of the proposed wording. Inserted the suggested wording for (e)	
~~Policy CC.9~~ Policy IM.2						
S23.92	Ātiawa ki Whakaron gotai	4.2 Regulatory policies -	Policy CC.9	The Trust supports the inclusion of Policy CC.9. The Trust suggests this policy should be included in multiple chapters across the RPS rather than just climate	This is an overarching policy and applies to all of the chapters.	**Policy IM.2: Equity and inclusiveness – consideration**

	Charitable Trust	matters to be considered		change, another option would be to include this policy in an integrated management chapter.		When considering an application for a notified resource consent, notice of requirement, or a change, variation or review of a regional and district plan particular regard shall be given to achieving the objectives and policy outcomes of this RPS in an equitable and inclusive way, by: (a) avoiding compounding historic grievances with iwi/Māori; and (b) not exacerbating existing inequities, in particular but not limited to, access to public transport, amenities and housing; and (c) not exacerbating environmental issues; and (d) not increasing the burden on future generations. Explanation This policy recognises and requires consideration of achieving the objectives and policy outcomes of this RPS in an equitable and inclusive way.
S16.42	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy CC.9	Oppose: We consider this draft policy attempts to direct how city and district councils will give effect to Section 8 of the RMA. These decisions are for the individual city and district councils within the region to make in partnership with tangata whenua. It is not the role of an RPS to direct how these partnerships work, or set out the matters a district plan must deliver to take into account the principles of the Treaty of Waitangi. This is not a power given to regional councils under the RMA. Decision requested: Delete Policy CC.9. Alternatively, amend Policy CC.9 so it applies only to the planning decisions of the regional council.	Suggestion not accepted. The requirements of Section 8 and the wider social, cultural and economic wellbeing purpose of the RMA justify inclusion of equity considerations particularly on Maori. This policy is not intended to be prescriptive on the means to achieve equity, rather where inequities are identified by parties, it provides an avenue for these to be factored into decision making.	
S11.014	Kāinga Ora	4.2 Regulatory policies - matters to be considered	Policy CC.9	Kāinga Ora strongly supports this policy, but would request that it is expanded to include inequality of access to public transport and amenities and consideration for affordable housing. Decision requested: (b) exacerbating existing inequities, **particularly in respect to access to public transportation, amenities and affordable housing;**	Inserted most of the suggestion.	
S19.42	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy CC.9	Note that this is labelled differently in Table 1A as "Equity and fairness". This is a very broad/vague policy that cannot be implemented. It needs to be clear in an RMA context. PCC consider that it needs to be deleted, or completely reworded considering for example: • What inequities? Between who? • What is the increased burden being placed on future generations (e.g. housing supply, environmental degradation etc) • What scale of consent would this policy be applied? • How would it be applied? • Further, how is this climate change related?	This policy applies to notified consents. It is about achieving the objectives and policy outcomes of this RPS in an equitable and inclusive way.	
S20.64	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy CC.9	The policy is creditable in terms of wanting to promote equity and inclusiveness in implementing the goals of the RPS. However, would benefit from prioritising polluter pays and equity of implementation across the region.	Have not included 'polluter pay'.	
S14.059	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy CC.9	Decision requested: This clause should apply all policy in the RPS,not just to Climate Change parts. Inter-racial and inter-generational equity isimpacting iwi and Mana Whenua differently as far as Climate Change impacts.	It is an overarching policy and applied across the RPS chapters.	
S9.33	Hutt City Council	4.2 Regulatory policies - matters to be considered	Policy CC.9	It is unclear what this is intended to achieve in terms of actual decisions on typical resource consents and plan changes Decision requested: Delete or clarify this policy	Policy clarified	
Policy IM.1						
S12.046	Ngā Hapū o Ōtaki	4.2 Regulatory policies - matters to be considered	Policy IM.1:	Decision requested: (a) ~~partnering~~ **reciprocal partnership** with mana whenua to ensure mana whenua involvement in resource management and decision making; and	Did not include 'reciprocal'. Awaiting decision.	**Policy IM.1: Integrated management - ki uta ki tai – consideration** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan particular regard shall be given to: (a) partnering with mana whenua to provide for mana whenua involvement in resource management and decision making; and
S23.101	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy IM.1:	Decision requested: The Trust supports Policy IM.1. The Trust is pleased with the drafting of this policy and the positive outcomes it will create for te taiao and mana whenua. The policy wording reflects Te Tiriti o Waitangi and current legislation (particularly the NPS-FM 2020).	Noted	

S16.50	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy IM.1:	Decision requested: Oppose: There is no statutory basis under the RMA or higher-level statutory planning documents to require particular regard be given to most of the matters raised by these draft policies when considering an application for resource consent, a notice of requirement, or a change to a district plan. Given the lack of a statutory basis for these matters, it is unclear how district plans could reasonably give particular regard to any of them in its decision making under the RMA. The only draft provision that city and district councils could reasonably have particular regard to when considering a resource consent or notice of requirements would be activities that fall under section 108(2)(c) of the Act as follows: (1) Except as expressly provided in this section and subject to section 108AA and any regulations, a resource consent may be granted on any condition that the consent authority considers appropriate, including any condition of a kind referred to in subsection (2). (2) A resource consent may include any 1 or more of the following conditions: (c) a condition requiring that services or works, including (but without limitation) the protection, planting, or replanting of any tree or other vegetation or the protection, restoration, or enhancement of any natural or physical resource, be provided:	Noted	(b) recognising the interconnectedness between air, freshwater, land, coastal marine areas, ecosystems and all living things – ki uta ki tai; and (c) recognising the interrelationship between natural resources and the built environments; and (d) making decisions based on the best available information, improvements in technology and science, and mātauranga Māori; and (e) upholding Māori data sovereignty; and (f) requiring Māori data and mātauranga Māori to be interpreted within Te Ao Māori; and (g) recognising that the impacts of activities may extend beyond immediate and directly adjacent area, and beyond organisational or administrative boundaries Explanation This policy requires that a holistic, integrated view is taken when making RMA decisions. It also requires both regional and district councils to provide for mana whenua / tangata whenua are actively involved in in resource management and decision making, including the protection of mātauranga Māori and Māori data.
S14.041	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy IM.1:	Decision requested: The policy ensures the involvement of mana whenua in resource management and decision making. It incorporates a more holistic view of the environment and its interconnectedness. There might need to be further clarification that making decisions based on mātauranga Māori need to be informed by mātauranga Māori knowledge holders. In terms of sharing data and information across all relevant agencies it should be specified that mātauranga Māori data sovereignty will be upheld, and Māori decide when their knowledge is shared.	Addressed by inclusion of (e) and (f), a well as the accompanying method.	
S19.51	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy IM.1:	Decision requested: Unclear what objective this is linked to, or what type of activities it should be applied to, and at what scale.	Noted	
S14.061	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy IM.1:	Decision requested: How does this Policy and its consideration work in the greater context for the Regional Policy Statement?	Noted	
Method IM.1						
S12.051	Ngā Hapū o Ōtaki	4.5.3 Non-regulatory methods - integrating management	Method IM.1:	Decision requested: (a) partner with ~~and~~ support **and resource** mana whenua to ensure mana whenua involvement in resource management and decision making; and	See the comment about 'resource' vs 'support'	**Method IM.1: Integrated management - ki uta ki tai** To achieve integrated management of natural resources, the Wellington Regional Council, district and city councils shall: (a) partner with and provide support to mana whenua / tangata whenua to provide for their involvement in resource management and decision making; and (b) partner with and provide support to mana whenua / tangata whenua to provide for mātauranga Māori is included and applied in natural resource management and decision making; and (c) work together with other agencies to ensure consistent implementation of the objectives, policies and methods of this RPS; and
S23.119	Ātiawa ki Whakarongotai Charitable Trust	4.5.3 Non-regulatory methods - integrating management	Method IM.1:	The Trust supports the intent of Method IM.1. The method upholds a Tiriti based approach to resource management and decision-making which acknowledges the integrated nature of the natural environment, ki uta ki tai. The Trust seeks further amendment of the policy to ensure that Māori data, including mātauranga Māori is appropriately protected, including storage, access and use. Māori data sovereignty is of the upmost important to mana whenua.	Suggested wording included except for 'determined by mana whenua', that is addressed in Method IM.2	

				The Trust suggest that Regional Council develop tikanga for Māori data in partnership with mana whenua. Decision requested: The Trust seek an amendment to Method IM.1:**(ff) Māori data, including mātauranga Māori, sites of significance, wāhi tapu, wāhi tūpuna are only shared in accordance with tikanga Māori to be determined by mana whenua.**		(d) enable connected and holistic approach to resource management that looks beyond organisational or administrative boundaries; and (e) recognise that the impacts of activities extend beyond immediate and directly adjacent area; and (f) require Māori data, including mātauranga Māori, sites of significance, wāhi tapu, wāhi tūpuna are only shared in accordance with agreed tikanga and kawa Māori; and (g) share data and information (other than in (f) above) across all relevant agencies; and (h) incentivise opportunities and programmes that achieve multiple objectives and benefits. *Implementation: Wellington Regional Council* and city and district councils*

Natural character

Submission Point	Submitter	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
Policy 3					
S12.035	Ngā Hapū o Ōtaki	Policy 3:	Decision requested: (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 **and cultural** history of the wider area.	NZCPS Policy 13 does not direct cultural values to be considered when identifying areas of high natural character.	**Policy 3: Protecting high natural character in the coastal environment – district and regional plans** District and regional plans shall include policies, rules and/or methods to protect high natural character in the coastal environment from inappropriate subdivision, development and/or use. Natural character should be assessed considering the following matters, with a site determined as having high natural character when the landscape is slightly modified or unmodified, the landcover is dominated by indigenous vegetation and/or the vegetation cover is natural and there are no apparent buildings, structures or infrastructure: (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~~ water forms, 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
S17.16	Masterton District Council	Policy 3:	Further clarity is required: - will this mean we can't do protection work on the coast? - Is the intent to block hard infrastructure? - And if we still use hard infrastructure, how do we do it? i.e. where in the RPS is this covered? - Need to reference sea level rise and implications CC.5 - This reads as not allowing land use intensification - is this correct? What is the intent? Decision requested: Further clarity required with this policy	RPS Policy 3 is in regards to the identification of high natural character in the coastal environment. The provisions in the relevant district plan (such as the Wairarapa Combined Plan) or the Natural Resources Plan will determine how natural character values are considered in consent decisions.	
S23.40	Ātiawa ki Whakaron gotai Charitable Trust	Policy 3:	The Trust seeks that Regional Council partner with mana whenua when identifying areas with high natural character. The Trust maintain their rangatiratanga over sites with mana whenua values in the rohe. Te Tiriti sets out a partnership approach to resource management.	GWRC agrees that the regional council should partner with mana whenua to identify areas/sites of high natural character in the coastal environment, in its jurisdiction; CMA and freshwater. NZCPS Policy 13 does not direct mana whenua values to be considered when identifying areas of high natural character.	

Submission Point	Submitter	Provision	Feedback on provisions	Response	New draft provisions drafted from original RPS
					natural elements, such that these may change and the natural elements and/or patterns may become threatened over time. ~~(c) Social values: the place, site or area has meaning for a particular community or communities, including:~~ ~~(i) sentimental: the natural character of a place, site or area has a strong or special association with a particular community; and/or~~ ~~(ii) recognition: the place, site or area is held in high public esteem for its natural character value, or its contribution to the sense of identity of a particular community.~~

Urban development

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
General						
S11.002	Kāinga Ora	3.9 Regional form, design and function		1. The Draft Change 1 has identified the lack of housing supply and choice within the Wellington Region and that housing affordability has declined. Kāinga Ora acknowledges this issue and it is of particular concern for Kāinga Ora given the lack of housing opportunities and choice available for lower-income families in the Wellington region. This issue identified by Draft Change 1 however isn't strengthened by any specific policies or directions within the RPS. Kāinga Ora suggests that a policy or policies are added to: a) On the need to promote and enable affordable housing to be provided in the Wellington region, through the increase of housing supply, housing choice, dwelling typologies and delivery partners (e.g., public/private), which is predicated upon the ability to build more homes and at different price points. This point can strengthen the draft proposed policies within Draft Change 1 that promote intensification around centres and transport nodes, to achieving a compact urban form with a range of densities; b) Promote for a range of housing typologies and sizes to be built across the region; c) Ensure that housing is located within locations that are well supported by infrastructure and amenities to build supportive and inclusionary communities; d) Direct that any district plan changes minimise regulatory barriers that constrain the ability to deliver housing development e.g., removal of density restrictions; and e) Ensure that appropriate services and infrastructure can be delivered to meet the required uplift in density and anticipated residential developments.	Noted. See comments to specific changes sought.	N/A
S18.021	Waka Kotahi	3 Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement		Future Development Strategy - We support the policies in the draft that cover the FDS. It is key to have a clear line of sight between the FDS and the RPS to enable implementation of the FDS strategic direction through to district plans. Urban development - we are generally supportive of the policies covering urban development topics, including ones that relate to the RLTP. At the next stage it would be good to discuss to understand how this will be applied, for example setting out TDM plan requirements and infrastructure requirements for growth.	Noted.	
S10.015	Wairarapa Iwi	3.9 Regional form, design and function		· Issues for Māori are not just around the amount of housing, but also the quality and affordability of housing · Papakāinga/Marae provisions need to apply to both urban and rural land · Need clarity around the definitions of ancestral or Māori owned land - and to ensure the provisions aren't restricted to Māori land under the Te Ture	Noted. See changes to specific provisions, in particular changes to UD.2 and UD.3.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				Whenua Act (that is restrictive to Māori) · Supportive of providing options for 'Māori purpose zone' that applies more broadly than Māori land, and allows for non-contiguous development e.g. across rural vs urban · Keen for a policy policy around developers engaging with ana Whenua pre notification · Want strong directive language · Would like to address the potential to address the problem around traditional Māori materials and the building Act. There is some flexibility in district plans - in what they can accept - can RPS direct here?		
S11.004	Kāinga Ora	3.9 Regional form, design and function	3.9	Kāinga Ora is generally supportive of the direction of integrating land use and transport planning in Draft Change 1, as this will help to discourage private vehicle dependency, and encourage multi modal transport and use of public/active transport for a means of travel, which is consistent with the direction of the NPS-UD. This will not only have a positive impact on the form, design, and function of the Wellington region, but will also contribute to the region's net-zero emissions target.	Noted. See comments to specific changes sought.	
S16.13	Kāpiti Coast District Council	3.9 Regional form, design and function	3.9	Oppose in part: We consider the commentary within this chapter needs to be amended to reflect the fact that medium density housing must be provided for across all relevant residential zones within Tier 1 city and district councils (from 20 August 2022 at the latest). The current and proposed wording of this chapter appears to overlook the fact that medium density housing must be enabled across all residential zones, not just in appropriate areas in and around centres and rapid transit stops. This level of unplanned residential intensification across all residential areas presents a risk to achieving the draft RPS change's aspirational zero and low-carbon emission goals. These challenges should be acknowledged in the RPS. Decision requested: Amend this chapter to acknowledge the intensification of housing enabled by the MDRS within Tier 1 local authorities beyond walkable catchments of centres and rapid transit stops.	Accept in part Commentary has been updated. However, the commentary does not go into explicit detail on the MDRS noting that this is already clear through national direction.	
S20.18	South Wairarapa District Council	3.9 Regional form, design and function	3.9	A number of the proposed provisions are set out requirements for those jurisdictions that are subject to the fullest extent of the NPS UD. While not willing to be subject to all requirements, some of the direction provided would be useful for 'other' urban development where this might better meet Part 2 of the RMA. However, we would request that we are not directed to achieve the same outcomes, but are able to encourage, enable or promote them.	Accept See changes to Objective 1 and underlying policies.	
S23.137	Ātiawa ki Whakaron gotai Charitable Trust	3.9 Regional form, design and function	3.9	In principle the Trust supports the intent of the proposed changes to give effect to the requirements of the National Policy Statement on Urban Development 2020. Further, the Trust supports the integrated, holistic approach that Regional Council have applied to addressing the impacts of urban development and to provide for well-functioning urban development. The Trust seeks further reference to mana whenua values, as well as addressing the impact of poor urban design on mana whenua and their relationship with the natural world. The Trust has sought further amendments to enable marae and papakāinga development and ongoing use. The Trust has suggested that the definition of 'marae' and 'papakāinga' be amended through this RPS Change 1.	Noted. See comments to specific changes sought.	
S25.014	Wellington Water	3.9 Regional form, design and function	3.9	What is happening with qualifying areas? Originally these were going to be addressed in the RPS.	The RPS assists in directing Territorial Authorities what are qualifying matters through the significant values and features directed in policy. The RPS does not identify specific qualifying matters as this is a	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
					requirement of the territorial authorities and requires a substantive evidence base which was not considered efficient to provide at a regional level.	
Introductory text						
S12.020	Ngā Hapū o Ōtaki	3.9 Regional form, design and function	Introductory text	Decision requested: Regional form and well-functioning urban environments are is about the physical arrangement within and between urban and rural communities. Good urban design seeks to ensure that the design of buildings, places, spaces and networks work well for communities, mana whenua**,** and are environmentally responsive. The concept of well-functioning urban environments was introduced in the National Policy Statement on Urban Development 2020. Well-functioning urban environments enhance the quality of life for residents as it is easier to get around, allows for a greater choice of housing close to where people work or to public transport, and provide vibrant, safe and cohesive town centres that enhance business, cultural and communal activity~~y~~ies. Communities and businesses are more resilient to the effects of climate change, and the up take of zero and low-carbon emission modes is supported throughout the region. In certain locations, the region's urban design has also been weakened by poorly designed developments and deteriorating infrastructure which have degraded urban environments.	Accept	Refer to Proposed RPS Change 1 document, chapter 3.9 Regional form, design and function for full text. The revised issues section is below: The regionally significant issues and the issues of significance to the Wellington region's iwi authorities for regional form, design and function are: A. Lack of housing The Wellington Region lacks sufficient, affordable, and quality (including healthy) housing supply and choice to meet current demand, the needs of projected population growth and the changing needs of our diverse communities. There is a lack of variety of housing types, including papakāinga. Housing affordability has declined significantly over the last decade, causing severe financial difficulty for many lower-income households, leaving some with insufficient income to provide for their basic needs and well-being. There is a lack of supporting infrastructure to enable the development of sufficient housing and the provision of quality urban environments. B. Inappropriate development Inappropriate and poorly managed urban land use and activities in the Wellington region have damaged, and continue to jeopardise, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increased the exposure of communities to the impacts of climate change. This has adversely affected mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. 1. Poor quality urban design Poor quality urban design can adversely affect public health, social equity, land values, the cultural practices and wellbeing of mana whenua / tangata whenua and communities, the vibrancy of local centres and economies, and the provision of, and access to, civic services. It can also increase the use of non-renewable resources and vehicle emissions in the region. 2. Sporadic, uncontrolled and/or uncoordinated development Sporadic, uncontrolled and/or uncoordinated, 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, public transport, water supply, 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
S17.9	Masterton District Council	3.9 Regional form, design and function	Introductory text	Decision requested: Agree	Noted.	
S23.32	Ātiawa ki Whakaronga tai Charitable Trust	3.9 Regional form, design and function	Introductory text	Issue A. The Trust in principle supports increased provision of housing based on it being in the right place and developed in line with the Ātiawa Kaitiakitanga Plan content. Issue B. The Trust seeks reference to the damage that has been done to relationships between tangata whenua and te taiao, and the ability to undertake cultural practices including manaakitanga. Issue 1. The Trust seek further amendment to issue 3 to provide for the impact on mana whenua. Issue 2. The Trust seek reference to the impact on sites of significance to tangata whenua, wāhi tapu and to rectify the lack of reference to the cultural and historical context of locations. Issue 3. The Trust seek reference to social isolation and disconnection when people cannot access transport options and requests Regional Council offer wording to this effect. Decision requested: B. Inappropriate development Inappropriate and poorly managed urban land use and activities in the Wellington region have damaged, and continue to jeopardise, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increase the exposure of communities to the impacts of climate change. This has adversely affected mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. 1. Poor quality urban design	Accept in part	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				Poor quality urban design can adversely <u>affect the cultural practices and wellbeing of mana whenua and communities,</u> public health, social equity, land values, the vibrancy of local centres and economies, and the provision of, and access to, civic services. It can also increase the use of non-renewable resources and vehicle emissions in the region. 2. Sporadic, uncontrolled and/or uncoordinated development Sporadic, uncontrolled and/or uncoordinated, development (including of infrastructure) can adversely affect the region's compact form. This can, among other things, result in: …. <u>(a) An adverse affect on mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</u> …		(d) insufficient population densities to support public transport and other public services (e) 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 adjacent. (i) <u>adverse effects on mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</u> 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), 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).
S24.011	Wellington City Council	3.9 Regional form, design and function	Introductory text	Support the proposed wording amendments in the introductory text that align with and implement the NPS-UD and the Enabling Housing Supply amendment act. Do not support the following sentences that have been added "The region is facing growth pressure though, which is undermining its ability to provide a well-functioning environment. These pressures reduce transport efficiency and limit the ability of all centres to provide community services and employment." as not all growth in the region is undermining the ability to provide a well-functioning environment or reducing transport efficiency or undermining centres. The majority of growth anticipated in Wellington City for example will be in the form of intensification of existing urban areas and will support a well-functioning environment, increase transport efficiency and support centres. Decision requested: Amend this wording to recognise that not all growth in the region is undermining the ability to provide a well-functioning environment and that in fact a lot of growth will support the creation of well-functioning environment, particularly intensification of existing urban areas.	Accept and updated.	
S25.015	Wellington Water	3.9 Regional form, design and function	Introductory text	"Have suggested some minor improvements. In addition, should there be recognition urban spaces themselves, and not just their proximity to transport and employment?" Decision requested: "In certain locations, the region's urban design has also been weakened by poorly designed developments which ~~negatively affect the look, feel, health, safety, vitality and vibrancy of those areas~~ have degraded urban **and natural** environments. ... Inappropriate and poorly managed urban land use and activities in the Wellington region **have placed people and property at risk from natural hazards and have** damaged, and continue to jeopardise, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increase the exposure of communities to the impacts of climate change. ... (a) new development that is poorly located in relation to existing infrastructure (such as roads, **water supply,** sewage and stormwater systems) and is costly or otherwise difficult to service"	Accept in part. Changes to introduction text have been made.	
S9.13	Hutt City Council	3.9 Regional form, design and function	Introductory text	For issue 2(a), one key piece of infrastructure is the inability of existing or practical-to-extend public transport networks to serve development. This is an issue independent of population density referred to in (d)	Accept	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				Decision requested: For issue 2(a), add "public transport" after "roads"		
Table 9						
S16.14	Kāpiti Coast District Council	3.9 Regional form, design and function	Table 9:	Table 9A: Housing bottom lines in the Wellington Tier 1 urban environment (page 50) Oppose in part: We note the long-term figure for the Kāpiti Coast District Council does not align with the figure from the latest HBA update. Decision requested: We request the figures in this table are checked for consistency with the figures from the latest HBA updates for all Tier 1 city and district councils in the region.	Noted.	
S23.33	Ātiawa ki Whakarongotai Charitable Trust	3.9 Regional form, design and function	Table 9:	The Trust seek further amendment to the introductory text to chapter 3.9 to provide for mana whenua values in regards to regional form design and function Decision requested:. 3.9 Regional form, design and function Regional form and well-functioning urban environments are about the physical arrangement within and between urban and rural communities. Good urban design seeks to ensure that the design of buildings, places, spaces and networks work well for communities and are environmentally responsive, and provides for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.	Accept	
S17.10	Masterton District Council	3.9 Regional form, design and function	Table 9:	Agree - the review of the WCDP will reflect this through areas of intensification - allowing for higher density and mixed use development.	Noted.	
Objective 22						
S12.021	Ngā Hapū o Ōtaki	3.9 Regional form, design and function	Objective 22:	NOTE: We are interested to see how this will be monitored and measured in the future to see success. All of these objectives are important to us, in particular (a), (b), (c), (f), (g) & (i). We highlight that as partners in the future we wish to co-develop the urban designs, plans and monitoring methods as well as be involved in measuring and evaluating trends to assess our communities progress on meeting and ensuring all these objectives. Mana whenua will also need to be supported and resourced to work with you on this aspect of the RPS & Regional Plan Decision requested: N/A	Noted	**Objective 22** Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning urban environments, which: (a) Are compact and well designed; and (b) Provide for sufficient development capacity to meet the needs of current and future generations, and (c) Improve the overall health, well-being and quality of life of the people of the region, and (d) Prioritise the protection and enhancement of the quality and quantity of freshwater; and (e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity, and (f) Support the transition to a low-emission and climate-resilient region, and (g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households, and (h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and (i) Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification, and (j) Provide for commercial and industrial development in appropriate locations, including employment close to where people live, and
S23.34	Ātiawa ki Whakarongotai Charitable Trust	3.9 Regional form, design and function	Objective 22:	The Trust seek further amendment to provide for mana whenua values in regards to well-functioning urban environments. This upholds and cross-references other legislation to ensure an integrated approach is applied to urban development in the Wellington region. Decision requested: Objective 22 Urban development, including housing and infrastructure, is enabled in ways that deliver well- functioning urban environments which: ….. (f) enable Māori to express their cultural and traditional norms *by providing for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga* ….	Accept	
S20.19	South Wairarapa	3.9 Regional form, design and function	Objective 22:	The objective is aimed at delivering WFUE. However, we support consideration of these outcomes in other urban environments where practicable.	Accept. Well-functioning urban environment is not defined in the RPS nor the NPS-UD and	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
	District Council				could apply to urban areas within the Wellington Region. To ensure that this is clear within the objective, it is proposed changes look to update the reference to include "and urban areas" which is a defined term.	(k) Are well connected through multi-modal (private vehicles, public transport, walking, micro-mobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space. ~~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;~~ ~~(k) efficiently use existing infrastructure (including transport network infrastructure); and~~ ~~(l) essential social services to meet the region's needs.~~
S17.11	Masterton District Council	3.9 Regional form, design and function	Objective 22:	Agree - the review of the WCDP will reflect this through areas of intensification - allowing for higher density and mixed use development.	Noted	
S25.016	Wellington Water	3.9 Regional form, design and function	Objective 22:	Address Te Mana o te Wai Decision requested: Objective 22 Urban development, including housing and infrastructure, is enabled in ways that deliver well- functioning urban environments which: … (j): support Te Mana o te Wai, including, but not limited to: (i) impact on local water bodies (ii) requiring efficient use of water(iii) reducing stormwater flows and contaminant loads	Reject. TMoTW is provided for through Clause (c). Being specific about TMoTW would raise a question over other significant values.	
S9.14	Hutt City Council	3.9 Regional form, design and function	Objective 22:	The objective does not reference the type of urban form that the Region is seeking (or now requires) - a compact form. This is a key component of the current RPS Objective 22 which is directive about where growth should be focused, but this is not explicit in this objective. It would also benefit from some recognition of the role of good urban design in supporting well-functioning urban environments. This is one of the resource management issues that is specifically noted in this section of the RPS but with the re-drafting of Objective 22 this element appears to have been lost completely from the objective. This should include reference to the creation of well-designed, mixed use environments which underpins the environments that we want to create through implementation of the NPS-UD Policy 3 and the WRGF. This needs to be directed in the RPS and much more explicity than this objective is currently doing. There should also be reference to making efficient use of land, as that is a key way of achieving the urban form that is desired. Decision requested: Urban development, including housing and infrastructure, is enabled in ways that deliver well- functioning urban environments which: *(a) are compact and well-designed;* ….	Accept	
S24.012	Wellington City Council	3.9 Regional form, design and function	Objective 22:	objective (i) does not account for the sustainable transport hierarchy. Urban design needs to prioritise the heirarchy. Also needs to include micromobility. Decision requested: Suggest adding prioritisation of various modes based on the sustainable transport hierarchy. Also needs to include micro-mobility options (e.g. scooters).	Accept in part. The sustainable transport hierarchy is important to the region, in particularly in providing for emissions reductions. However, this is better suited to be directed through the Regional Land Transport Plan. Accept the addition of "micro-mobility" to the indicated modes of transport in clause (i)	
Objective 22A						
S16.15	Kāpiti Coast District Council	3.9 Regional form, design and function	Objective 22A:	Oppose in Part: We note the housing bottom lines are not required to be met in terms of housing that is to be built. The wording used in draft Objective 22A could be misread to refer to housing delivery rather than the amount of housing provided for in district plans.	Accept Changes proposed have been largely accepted. Changes to the wording is now proposed to ensure the definition is of tier 1	**Objective 22A:** To achieve sufficient development capacity to meet expected housing demand in the short-medium and long term in any *tier 1 urban environment* within the Wellington Region, the housing

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				To address this we request the wording of this draft objective be amended as follows: In order to achieve sufficient development capacity to meet expected housing demand in the short-medium and long term in the Wellington Tier 1 urban environment, the following housing bottom lines in Table 9a are to be provided for met or exceeded in the short-medium and long term in the Wellington Tier 1 urban environment. Objective 22B: It is unclear what is intended by rural areas being 'strategically planned'. Significant values and features that fall under section 6 of the RMA are already required to be protected and managed under district plans. More explanation is required. The wording of Policy 56 provides no additional insights into what is required to achieve this objective. Decision requested: Amend draft Objective 22A as follows: In order to achieve sufficient development capacity to meet expected housing demand in the short-medium and long term in the Wellington Tier 1 urban environment, the following housing bottom lines in Table 9a are to be provided for met or exceeded in the short-medium and long term in the Wellington Tier 1 urban environment. Objective 22B: Amend Objective 22B to describe what is meant by strategically planning for rural areas. Amend Objective 22B to clearly identify the significant values and features identified in the RPS that are to be effectively managed. Explain what effectively managed means for district plans. Amend Policy 56 so the intended method(s) to achieve Objective 22B is described.	urban environment is consistent with the NPS-UD.	bottom lines in Table 9A are to be met or exceeded in the short-medium and long term in the *Wellington Tier 1 urban environment*. Note: Objective 22A and Table 9A are inserted into the Regional Policy Statement directly under section 55(2)(b) of the Resource Management Act 1991, i.e. without reference to RMA Schedule 1, as directed by the NPS-UD. The short-medium term (2021- 2031) and long term (2031- 2051) housing bottom lines are drawn from the Wellington Regional Housing and Business Development Capacity Assessment, Housing update – May 2022.
S23.35	Ātiawa ki Whakarongotai Charitable Trust	3.9 Regional form, design and function	Objective 22A:	In principle the Trust support Objective 22A.	Support noted.	
S18.5	Waka Kotahi	3.9 Regional form, design and function	Objective 22A:	To table 9A, include 'additional' to clarify these are new dwellings Decision requested: Additional total dwellings	Accepted	
S17.12	Masterton District Council	3.9 Regional form, design and function	Objective 22A:	Intensification - does that just apply to Tier one councils? How does this impact any Wairarapa District Councils, and if so - how? In the review of the WCDP we have looked to intensify the residential zone (in certain areas). Decision requested: Further clarity sought on how this will impact Tier 3 councils	Introduction seeks to clarify this.	
Objective 22B						
S12.025	Ngā Hapū o Ōtaki	3.9 Regional form, design and function	Objective 22B:	There needs to be specific reference to cultural values in the reference to "significant values"	Reject. While cultural values are important to highlight, adding reference would raise	**<u>Objective 22B</u>**

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				Decision requested: Development in the Wellington Region's rural area is strategically planned and impacts on significant values *(including cultural)* and features identified in this RPS are effectively managed.	question over other values that have not been stated.	Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features identified in this RPS are managed effectively.
S23.36	Ātiawa ki Whakarongotai Charitable Trust	3.9 Regional form, design and function	Objective 22B:	The Trust seek further reference to mana whenua values to provide for these in the rural area. Decision requested: Objective 22B Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features identified in this RPS, including mana whenua values are effectively managed	Reject. While cultural values are important to highlight, adding reference would raise question over other values that have not been stated.	
S17.13	Masterton District Council	3.9 Regional form, design and function	Objective 22B:	Agree	Support noted	
S20.20	South Wairarapa District Council	3.9 Regional form, design and function	Objective 22B:	Objective 22B: This is so broad as to not be useful. Prefer to adopt the some of the relevant aspects of delivering WRUE as noted above.	The addition of 22B is largely a consequential change as a result of the addition of Objective 22. It looks to provide status quo direction from the operative. While it is very high level, further direction is provided through Policy 56.	
S16.15	Kāpiti Coast District Council	3.9 Regional form, design and function	Objective 22B:	Objective 22B: It is unclear what is intended by rural areas being 'strategically planned'. Significant values and features that fall under section 6 of the RMA are already required to be protected and managed under district plans. More explanation is required. The wording of Policy 56 provides no additional insights into what is required to achieve this objective. Decision requested: Objective 22B: Amend Objective 22B to describe what is meant by strategically planning for rural areas. Amend Objective 22B to clearly identify the significant values and features identified in the RPS that are to be effectively managed. Explain what effectively managed means for district plans.	Reject. This is a consequential change with the addition of Objective 22 and reflects status quo direction. Further direction is provided through Policy 56 for how this will be achieved.	
Policy 30						
S23.59	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 30:	The Trust supports Paraparaumu being listed as a Metropolitan centre.	Noted.	**Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres – district plans** District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of ~~regional central business district in the Wellington city and the~~: 1. the regionally significant centres of Wellington City; 2. Other regionally significant centres: (i) Upper Hutt; (ii) Lower Hutt; (iii) Porirua; (iv) Paraparaumu; (v) Masterton; and 3. the locally significant centres of ~~Suburban centres in~~: (i) Petone; (ii) Kilbirnie; ~~and~~
S17.33	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 30:	Agree - being looked at in WCDP review.	Noted.	
S11.010	Kāinga Ora	4.1 Regulatory policies -	Policy 30:	Kāinga Ora supports this policy, however consider that additional wording could be added to promote growth of these centres and recognise that housing within	Reject.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
		direction to district and regional plans and the Regional Land Transport Plan		centres also has a significant role to play in enhancing and maintaining centre vibrancy. Kāinga Ora also notes that the list of centres does not correspond correctly to the centres hierarchy given to centres within each district plan. Decision requested: District plans shall include policies, rules and/or methods that enable and manage a range of land use activities, <u>including residential,</u> that maintain and enhance the viability and vibrancy of the regional significant centres <u>whilst acknowledging and promoting growth to these centres…</u>	This would take away from the intent of the direction. The changes sought are provided through Policy 31.	(iii) Johnsonville~~,~~; (iv) <u>Ōtaki;</u> (v) <u>Waikanae;</u> (vi) <u>Featherston;</u> (vii) <u>Greytown</u> (viii) <u>Carterton; and</u> (ix) <u>Martinborough.</u> <u>Explanation</u> <u>Policy 30 identifies the hierarchy of regional and locally significant centres within the Wellington Region for which district plans must maintain and enhance their vibrancy and vitality. The centres identified are of significance to the region's form for economic development, transport movement, civic or community investment. Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. It is also important for their prosperity and resilience in the face of social and economic change. The regional central business district is the major centre in the Wellington region; the other key centres also provide significant business, retailing and community services. It is noted that this policy does not limit territorial authorities from identifying additional centres of local significance within the district plan.</u>
S19.19	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 30:	Does not clearly identify a regional form (Wellington urban environment) that appropriately implements the intensification hierarchy contained in Policy 3. These zone names do not reflect the zone descriptions in the National Planning Standards. Are the Wellington CBD, Porirua city centre, Lower Hutt city centre and Upper Hutt city centre all City Centre Zones under NPS-UD Policy 3(a)? If so, how will this achieve a well-functioning urban environment, given the differing accessibility and catchment size between the Wellington CBD and the other centres? By way of example, Auckland only has one City Centre Zone. Other larger, sub-regional centres are Metropolitan Centres. Decision requested: It needs to more clearly identify and direct which locations meet/are: • 3(a) - city centre, where the highest level of intensification in the region is to be enabled • 3(b) - metropolitan centres • 3(c) - direction on what is a walkable catchment to be used consistently across the region • 3(d) - direction on how to identify local centres and neighbourhood centres	Changes to this policy are not for the purposes of giving effect to the NPS-UD, rather to ensure consistency with the national planning standards. Changes have been proposed to Policies 31 and UD.1 to clarify this.	
S24.022	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 30:	It is noted Porirua CC has declared their 'city' centre to be a Metro Centre, not City Centre, while Hutt City and Upper Hutt are keeping their "city" centre zones under RMA's Planning Standards. We believe that the new Natural and Built Environments Plan is likely to rationalise this to a region-wide centres hierarchy.	Accept. Proposed change remove references to planning standard zones.	
S17.068	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 30:	While we recognise that this a regional policy statement for the greater wellington region -it is very metro-centric and does not always recognise sub-regional and district level differences. For example, public transport in the Masterton District and throughout the Wairarapa is significantly limited in comparison to the Hutt, Wellington, and Porirua regions. Decision requested: N/A	Noted. This is recognised and is further reflected in changes to Policies 31 and UD.1	
S9.21	Hutt City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 30:	It is unclear what is gained by specifically referring to zone names (city centre, metropolitan centre, town centre) as this is a question for district plans Decision requested: Delete the zone names and present the list of centres as a single list	Reject. This would reduce the applicability of the policy to provide a clear hierarchy of centres in the region. However, proposed changes seek to clarify and remove zone names.	
Policy 31						

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S11.011	Kāinga Ora	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 31:	Kāinga Ora supports this policy but request that the wording aligns more specifically to Policy 3 of the NPS-UD. Decision requested: District plans shall: (a) ~~identify key~~ *Realise as much development capacity as possible for intensification* in city centres and *include building heights and density of at least 6 storeys* in metropolitan zones for intensification; and (b) identify other locations suitable for intensification, where there is good access to existing and planned rapid transit, edge of city centres and metropolitan zones *of at least 6 storeys.* ~~and areas with a range ofcommercial activities and community services,~~ *Adjacent to neighbourhood centre zones, local centre zones, and town centre zones, realise intensification proportionate with the level of commercial activity and community service.*	Accept in part. The current policy does lack detail in terms of the directive for intensification and relies primarily on the definition for 'intensification". While these changes have not been accepted, further clarity to the requirements for each of the territorial authorities has been given.	**Policy 31: Identifying and ~~promoting~~ enabling a range of building heights and density ~~higher density and mixed use development~~ - district plans** District plans shall include policies, rules and/or methods that identify a range of different building heights and density within *urban areas* where it contributes to maintaining, establishing or improving the qualities and characteristics of well-functioning urban environments, including as a minimum: (a) For any *tier 1 territorial authority*, identify areas for *high density development* within: (i) *City centre zones* and *metropolitan zones*; and (ii) any other locations, where there is with good access to: 1. existing and planned rapid transit; 2. edge of *city centre zones* and *metropolitan zones*; and/or 3. areas with a range of commercial activities and community services. (b) For any *tier 1 territorial authority*, identify areas for *medium density residential development* within any *relevant residential zone*. (c) For any other territorial authority not identified as a tier 1 territorial authority, identify areas for greater building height and density where: (i) there is good access to existing and planned active and public transport to a range of commercial activities and community services; and/or (ii) there is relative demand for housing and business use in that location. ~~:~~ ~~identify key centres suitable for higher density and/or mixed use development;~~ ~~identify locations, with good access to the strategic public transport network, suitable~~ ~~for higher density and/or mixed use development; and~~ ~~(c) include policies, rules and/or methods that encourage higher density and/or mixed use~~ ~~development in and around these centres and locations,~~ Explanation Policy 31 requires identification of areas suitable for intensification, and enables intensification in these areas, giving effect to Policy 3 of the National Policy Statement on Urban Development 2020. Policy 31 also enables greater building height and densities to be provided for in non-tier 1 territorial authorities which includes Masterton being a tier 3 territorial authority as well as Carterton and South Wairarapa. Providing for this development is consistent with Policy 5 of the National Policy Statement on Urban Development 2020.
S16.21	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 31:	Oppose: (Policies 31 and UD.1) The wording of these policies does not acknowledge the requirements and impacts of implementing the Medium Density Residential Standards across all relevant residential zones by Tier 1 local authorities. We consider the concept of well-functioning urban environments under the NPS-UD cannot be described in the absence of describing the potential impacts on intensification and urban form that the implementation of the MDRS may result in. As currently worded, the policies only acknowledge part of the realities of planning for urban intensification and development via district plans. Decision requested: Amend this policy to ensure the requirements of the MDRS for Tier 1 local authorities, and the potential urban development outcomes resulting from the implementation of the MDRS are included.	Accept in part.	
S23.60	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 31:	The Trust does not oppose intensification provided it is in the right place and developed in line with the Ātiawa Kaitiakitanga Plan. The Trust proposes further amendment to include the requirement that District Plans shall identify qualifying matters, where intensification is not suitable. Decision requested: Policy 31: Identifying and promoting intensification - district plans District plans shall: (a) identify key centres and metropolitan zone for intensification; and (b) identify other locations suitable for intensification, with where there is good access to existing and planned rapid transit, edge of city centres and metropolitan zones and areas with a range of commercial activities and community services; and (c) identify qualifying matters, where intensification is not suitable.	Reject. While qualifying matters are a key component ensuring appropriate intensification, Policy 31 only relates to areas to identify. Policy UD.1 would ensure that qualifying matters are effectively accounted for through its requirement that it is only where the height and density establishes, contributes or maintains a well-functioning urban environment.	
S17.34	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 31:	Agree - being looked at in WCDP review - areas for intensification being provided.	Noted.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S19.20	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 31:	All this policy is doing is repeating the NPS-UD. Needs to actually add value here. That could be for example, setting out what a walkable catchment is, what a rapid transit stop is. Policy UD.1: This policy provides no added value. We are already required to do this under the RMA. Decision requested: Further direction for intensification including definition of "walkable catchment' and 'rapid transit'.	Reject. Feedback from other territorial authorities is to not define walkable catchment. As there are distinct differences throughout the district, we also consider that a single definition can be provided. We considered providing a consistent methodology, however, again we consider that this would unduly restrict the districts from accurately identifying walkable catchment. The current policy uses "good access to" rather than walkable catchment – this is to ensure that it is consistent with the existing direction of the RPS. Rapid transit and rapid transit stop is already defined in the Regional Land Transport Plan and we do not consider it is necessary to redefine it here. Changes to the policy look to provide further clarity on the direction.	
S14.034	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 31:	This policy does not mention the role of intensification and greenfield development interaction, and this may not recognise the land development trends and nuances that every city in the Greater Wellington region is going through. In Porirua, Porirua PDP Future Urban Zone (FUZ) suggested large areas of greenfield development including central government fast track greenfield development projects such as, the Plimmerton Farms. This means Porirua will gear up for quite a number of housing projects, supplied with greenfield development as well as giving effect to Government's NPS-UD requirements of intensification and densification. This policy is not clear where the intensification is expected to be covered by brownfield development and whether greenfield development is considered as part of intensification. This will have repercussions for the environment. It is unclear that Policy UD.1 Enabling intensification - district plans is kept separately as the policy intention could have been included in Policy 31.	While this policy is specific to intensification/building height and density, it does not work in isolation, it also requires the development to contribute to the qualities and characteristics of well-functioning urban environments as outlined in Objective 22. New urban areas (including both greenfield or brownfield) must also be considered under Policy 55 which gives direction on minimum requirements, including managing effects on the natural environment and other significant values identified in the RPS (including values of significance to Tangata Whenua). Policy 55 also requires consideration against the Wellington Regional Growth Framework of the Future Development Strategy which sets out the strategic and spatial direction. There has been changes made to the policy to provide better clarity.	
S9.22	Hutt City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 31:	This policy needs to be clear that it only applies to Tier 1 Tas Decision requested: 1. Change the policy to only apply to Tier 1 TAs. 2. Amend (a) to 'identify city centre and metropolitan zones for intensification 3. Insert new clause (b): 'identify areas within a walkable catchment of the edge of city centre zones and metropolitan zones for intensification' 4. Amend (b) to become new clause (c) and delete 'edge of city centre zones and metropolitan zones for intensification	Accept in part. Proposed changes clarify the responsibilities of each council and changes wording which accepts some of the suggestions. Walkable catchment is not specifically referenced, rather "good access to" to ensure consistency with the existing direction (which is familiar) and to avoid interpreting that the RPS direct what a walkable catchment is.	
S25.020	Wellington Water	4.1 Regulatory policies - direction to district and regional plans	Policy 31:	Decision requested: Would if be helpful for this to reference qualifying matters in some form? Clause (b) is unclear. If an area meets the list of attributes, does it have to be listed? Or can it only be listed if it fulfils all attributes?	Qualifying matters are not specifically referenced but will need to be identified by the territorial authorities. Reference to "the qualities and characteristics of well-	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
		and the Regional Land Transport Plan			functioning urban environments" provides for this. Updates to the policy clarify the direction.	
Policy UD.1						
S17.067	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.1	There are a number of proposed changes that are more applicable to Tier 1 Councils. There needs to be clearer differentiation in the RPS of roles/ responsibilities/expectations for Tier 1 and Tier 3 Councils.	Accept Changes are proposed to ensure this clarity is provided (see Policy 31)	Policy removed and incorporated into Policy 31.
S25.021	Wellington Water	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.1	Would it be helpful for this to reference qualifying matters in some form?	Qualifying matters are not specifically referenced but will need to be identified by the territorial authorities. Reference to "the qualities and characteristics of well-functioning urban environments" provides for this.	
S9.23	Hutt City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.1	As above, this policy needs to be clear that it only applies to Tier 1 TAs	Accept in part Policy has been updated to reflect what is required of tier 1 and non-tier 1 districts.	
Policy 32						
S23.61	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 32:	The Trust takes an interest in this Policy.	Noted.	**Policy 32: Identifying and protecting key industrial-based employment locations – district plans** District plans ~~should~~ shall include policies, rules and/or methods that identify and protect key industrial-based employment locations where they contribute to the qualities and characteristics of ~~maintain and enhance~~ well-functioning urban environments ~~compact, well designed and sustainable regional form~~ by: (a) Recognising the importance of industrial based activities and the employment opportunities they provide. (b) Identifying specific locations and applying zoning suitable for accommodating industrial activities and their reasonable needs and effects including supporting or ancillary activities. (c) Identifying a range of land sizes and locations suitable for different industrial activities, and their operational needs including land-extensive activities, (d) Managing the establishment of non-industrial activities, in industrial zones, by avoiding activities likely to result in reverse sensitivity effects on industrial activities, or likely to result in an inefficient use of industrial zoned land or infrastructure.
S17.35	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 32:	Agree - zones being reviewed as part of WCDP review.	Noted.	
S19.21	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 32:	Protect how and from what? Some direction is needed here. We note that the explanation in the existing policy includes issues or matters which may inform the above direction, e.g. displacement of industry, demand for and efficient use of existing infrastructure.	Accept Initial changes had been consequential with the change to Objective 22; however, it is accepted that further direction should be provided. Clauses (a) – (d) look to provide further direction on how protection is provided through district plans.	
Policy 33						

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S23.62	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 33:	The Trust supports in principle Policy 33.	Noted.	**Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions ~~a compact, well-designed and sustainable regional form.~~ – Regional Land Transport ~~Strategy~~ Plan** The Wellington Regional Land Transport Plan ~~Strategy~~ shall contain objectives and policies that support well-functioning urban environments and a reduction in transport related greenhouse gas emissions and vehicle kilometres travelled of the light vehicle fleet. ~~maintenance and enhancement of a compact, well-designed and sustainable regional form.~~
S17.36	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 33:	Include the District Plan which will allow for infrastructure to support the Policy	Reject. This is provided for through Policy 57 and 58.	
S18.10	Waka Kotahi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 33:	Support this wording and seek inclusion of VKT here if appropriate, noting that the RLTP will have to reflect the requirements in ERP action 10.1.1 and will need to reference/be consistent with the Wellington VKT reduction programme being developed under ERP Action 10.1.2 (A) (in 2023-24). Decision requested: The Wellington Regional Land Transport Plan shall contain objectives and policies that support well-functioning urban environments and a reduction in carbon emissions *and vehicle kilometres travelled of the light vehicle fleet.*	Accept.	
S20.39	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy 33:	Policy UD.1/Policy 33 Support the identification and enabling of areas of intensification. In particular, for Featherston. I note that Policy 33 could be interpreted as only applying to 'urban areas', which would not apply to Featherston, but should do.	Accept in part. Proposed changes seek to provide further clarity for non-tier 1 districts.	
Policy UD.2						
S12.033	Ngā Hapū o Ōtaki	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.2:	Note our support for this policy. Decision requested: Placeholder Policy UD.2: Provision for *and resourcing* marae, papakāinga *and other development for cultural purposes as identified by mana whenua* - district plans	Accept in part The title of the policy has been updated to broaden from papakāinga and marae.	**Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land – district plans** District plans shall include objectives, policies, rules and/or methods that provide for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land, by: (a) Enabling mana whenua / tangata whenua to exercise their Tino Rangatiratanga; and (b) Recognising that marae and papakāinga are a Taonga and making appropriate provision for them; and (c) Recognising the historical, contemporary, cultural, and social importance of papakāinga; and (d) If appropriate, identifying a Māori Purpose Zone; and (e) Recognising Te Ao Māori and enabling mana whenua / tangata whenua to exercise Kaitiakitanga; and (f) Providing for the development of land owned by mana whenua / tangata whenua.
S12.039	Ngā Hapū o Ōtaki	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.2:	Decision requested: Placeholder Policy UD.2:Provision for marae and papakāinga - district plans District plans shall include policies, rules and methods that make appropriate provision for development of *marae,* ~~and~~ *papakāinga,* **and other mana whenua infrastructure.**	Accept in part The title of the policy has been updated to broaden from papakāinga and marae.	
S23.63	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans	Policy UD.2:	In principle the Trust supports the inclusion of policies, rules and methods that make appropriate provision for development of marae and papakāinga. The Trust seeks further amendment to require district councils to also include objectives that make appropriate provision of marae and papakāinga.	Accept	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
		and the Regional Land Transport Plan		Decision requested: Placeholder Policy UD.2: Provision for marae and papakāinga - district plans District plans shall include objectives, policies, rules and methods that make appropriate provision for development of marae and papakāinga.		
S17.37	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.2:	Agree - being looked at in WCDP review - allowing for it as a permitted activity in appropriate zones.	Noted.	
S10.016	Wairarapa Iwi	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.2:	· Iwi worked with Charles to develop draft placeholder policies around Māori purpose land, marae and papakāinga. o They wanted an overarching policy that applies more broadly than marae and papakāinga - alongside one that provided clear direction to TAs on marae and papakāinga o Keen for policies to be as directive as possible and use strong wording e.g. 'must provide for marae/papakāinga' and 'enable' tino rangatiratanga (check if stronger wording can be used) · Need to research and look into including definitions for 'tino rangatiratanga' and discussed whether is better to define it with each mana whenua at the district level , papakāinga and ancestral land that could be included	Accept Following consultation with Wairarapa Iwi, the policy has been substantively changes to form two policies. Policy UD.2 now provides overarching direction to TA's for maori culture and traditions in land use and development. By remaining broad, this provides the ability for discretion at a local level in determining how to provide for maori cultures and traditions. Policy UD.2 provides specific direction to territorial authorities for providing to the occupation use and development tangata whenua with their ancestral land. This includes direction to territorial authorities on how this is achieved.	
S11.012	Kāinga Ora	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.2:	Decision requested: Kāinga Ora support the inclusion of a policy or policies focusing on marae and papakāinga, as well as kaumatua housing in district plans and consider there is room for improvement across all district plans within the Wellington Region. These policies need to focus on providing more enabling provisions for papakāinga, marae and kaumatua housing and should also promote and recognise urban papakāinga.	Proposed changes look to recognise this and that it is broader than just papakāinga and marae.	
S19.22	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.2:	Support in principle - aligns with PDP. However, who can develop marae and papakāinga? In our PDP it is limited to those with ancestral connection to the land i.e. Ngāti Toa, in accordance with their wishes.	Proposed changes seek to provide further direction and provides for this to be identified at the local level. It also references ancestral land, noting that this is not defined in the RPS (and based on feedback from Mana Whenua, should not be defined).	
S20.40	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.2:	Provisions to support marae and papakianga - Place holder only	Noted.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S24.023	Wellington City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy UD.2:	Decision requested: The lateness of these proposed changes means that NPS-UD district plan changes (and new DP in our case) don't have time to give effect to the amended RPS directions before August notifications. We'll have to do it through future plan changes	Noted. Policy UD.3 will provide for consideration of broad values, including papakāinga and marae in general process in the interim.	
Policy CC.3						
S23.66	Ātiawa ki Whakarongotai Charitable Trust	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.3:	The Trust supports the inclusion of policies, rules and/or methods for environmental integration in urban development into the district plans. The Trust seek the following changes (see adjacent column). This wording aligns with Ātiawa ki Whakarongotai values and is in keeping with legislation (RMA 1991, NPS-FM 2020). Decision requested: Policy CC.3: Environmental integration in urban development - district plans District plans shall include policies, rules and/or methods that ensure any urban development within urban environments contributes to establishing, improving or maintaining the qualities of a well-functioning urban environment by integrating the following: (a) water sensitive urban design principles consistent with Policy FW.1; and (b) climate resilient urban environments consistent with Policy CC.17; and (c) a 'ki uta ki tai', whole of a catchment approach, that recognises the impact extends beyond immediate and directly adjacent area; and (d) a transition to low and/or zero carbon multimodal transport consistent with Policy 7 and Policy EIW.1. (e) protect and enhance Māori freshwater values, including mahinga kai; (f) provide for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga;	Accept in part. The changes suggested are relevant; however on review of this policy, it is considered more appropriate to be specific to climate resilient urban areas which cross references with Policy CC.17. The other matters of the policy are already provided elsewhere in the RPS and duplicating may result in implementation issues. Clause (a) is provided through Policy FW,1; Clause (c) is provided through policies IM.1 and FW.3; clause (d) is provided through Policies CC.4 and 58; and Clause (f) is provided through Policy UD.3.	**Policy CC.4: Climate-resilient urban areas –district and regional plans** District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments. Explanation Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. For the purposes of this policy, climate-resilient urban areas mean urban environments that have the ability to withstand: • Increased temperatures and urban heat island • Increased intensity of rainfall and urban flooding • Droughts and urban water scarcity and security • Increased intensity of wind, cold spells, landslides, fire, and air pollution The policy is directly associated with Policy CC.14 which provides further direction on actions and initiatives to provide for climate resilient urban areas. It is noted that other policies of this RPS provide for actions and initiates of climate resilient urban areas, including Policy FW.3.
S16.24	Kāpiti Coast District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.3:	Oppose: This policy appears to have been drafted in the absence of the consideration of the impacts of the increased intensification and as-of-right intensification that can occur under the MDRS once incorporated into district plans from no later than 20 August 2022. We request this policy, if it is to be retained, should take a non-regulatory approach or be in the form of encouragement and support rather than directing regulatory methods to be included in district plans. Decision requested: Delete policy CC.3, or amend to remove regulatory methods.	Reject Changes to policy look to narrow the policy to climate change resilience as directed through Policy CC.17. Policy CC.17 has also been amended in light of these comments. This remains appropriate as a regulatory policy. This also aligns with clause (f) of Policy 1 of the NPS-UD.	
S17.40	Masterton District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.3:	Clarify the term "environmental integration".	Accept The term has been removed and the policy now is specific to climate resilience.	
S18.13	Waka Kotahi	4.1 Regulatory policies - direction to district and regional plans	Policy CC.3:	Clarify if (c) refers to a whole of water catchment approach	N/A Clause is now removed.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
		and the Regional Land Transport Plan				
S19.25	Porirua City Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.3:	There is a drafting issue with duplication here - why does a policy just require that other policies be met? Further: (a) WSUD principles need to be defined. (b) What is a climate resilient urban environment? Needs to be defined. Climate change resilient? (c) Unclear what this means. What impact - impact of new development? Impact on what? Needs rewording.	Accept Proposed changes make the policy specific to climate resilience and link with Policy CC.17. The meaning of climate resilient urban area is provided in the explanation.	
S20.42	South Wairarapa District Council	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.3:	Support development in 'Urban Environments' to ensure water sensitive design, climate resilient whole catchment, low carbon transport. Not required for SWDC but would like the option to support those outcomes for significant developments in the District Plan, but not be required to do so.	Noted. Changes to policy remove WSUD, but this does remain a requirement in FW.1 which is not explicit to only urban environments.	
S14.036	Ngāti Toa	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.3:	The policy intention is supported however, the policy wording 'ensure' is not strong enough directing district plans to integrate environment in urban development. This policy could give stronger direction to District Councils that the policy is implemented in rules and standards.	Accept Ensure has been amended to provide for.	
S25.022	Wellington Water	4.1 Regulatory policies - direction to district and regional plans and the Regional Land Transport Plan	Policy CC.3:	Should this address piping of streams? Could include providing access to the natural environment and not just protect and enhance its quality - another green infrastructure/WSUD supporting measure. Also provides amenity/better urban spaces.	N/A WSUD has been removed from this policy. See comments for Policy FW.1.	
Policy UD.3						
S23.84	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy UD.3:	In principle the Trust supports the provision for marae and papakāinga. The Trust seek further amendment to the policy. The Trust identifies two issues that are relevant to this policy: - Proposed development on sites adjacent to Marae and Papakāinga; and - Enabling development of new Marae and Papakāinga. Whakarongotai marae, given its urban location is particularly affected by development. The Trust seeks that this policy protect and provide for sensitive and inappropriate development adjacent to marae and papakāinga. In addition, the current wording as drafted by Regional Council appears to only include existing marae and papakāinga. The Trust has suggested further changes to enable future development, this gives effect to the NPS-UD to provide for diverse housing options, and to provide for Māori to express their 'cultural and traditional norms'. Decision requested:	Accept in part. This change has been reflected in Policy UD.2 that gives the specific direction for marae and papakāinga. This policy has been amended to be broad and overarching for providing values of significance to mana whenua.	**Policy UD.2: Enable Māori cultural and traditional norms – consideration** When considering an application for a resource consent, notice of requirement, or a plan change of a district plan for use or development, particular regard shall be given the ability to enable Māori to express their culture and traditions in land use and development, by as a minimum providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				Placeholder Policy UD.3: Marae and papakāinga - consideration When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, particular regard shall be given to the historical, **contemporary,** cultural and social importance of marae and papakāinga and to **enable their** ~~provide for~~ **development as well as**~~their~~ ongoing use and development.		
S12.023	Ngā Hapū o Ōtaki	4.2 Regulatory policies - matters to be considered	Policy UD.3:	Policy UD.3: Marae, papakāinga **and developments significant o mana whenua for cultural reasons -** Consideration **and resourcing**	Accept in part The title of the policy has been amended to provide for broader values. Resourcing cannot be provided for in a regulatory policy of the RPS.	
S19.35	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy UD.3:	Reword so this is specific to consents for marae and papakāinga.	Accept in part. This policy and UD.2 would also include consideration of impacts upon marae and papakāinga. Proposed changes seek to clarify. The policy has been amended to remove the variation or review of a district plan as this is effectively provided through Policy UD.2. In addition to resource consents, a notice of requirement or a private plan change may also require consideration against this matter.	
S17.49	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy UD.3:	Agree - being looked at in WCDP review - allowing for it as a permitted activity in appropriate zones.	Noted.	
S20.57	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy UD.3:	Provisions to support marae and papakianga - Place holder only	Noted.	
S14.052	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy UD.3:	The consideration of this policy should apply to all tangata whenua sites of significance and other land that has been given back/ returned to iwi. Some of these lands that are returned to Tangata Whenua,iwi would have a raft of different values associated to the whenua and the values will be dynamic -can change over time. Urban Development provisions need to recognise these values and that recognise they will play out differently indifferent sites and Papakāinga should not be negatively impacted in the face of intensification and densification proposals, and this could be addressed when considering resource consent applications. This may need to extend to other taonga and sites and areas of significance, awa and moana and important places where iwi still practice cultural matāuranga.	Accept The proposed changes to both UD.2 and UD.3 have broadened from marae and papakāinga and provide further direction on how they are to be provided for and managed.	
Policy 55						
S16.37	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy 55:	Oppose in part: We oppose the list of matters included in clause (a)(ii) of Policy 55 as on our reading they attempt to direct city and district councils on the application of qualifying matters. Determinations on qualifying matters within district plans are not decisions for regional councils. The term avoid needs to be carefully considered. We note section 6 matters do not all require avoidance as	Accept in part Resource consents remains relevant for Policy 55 as there could still be an instance where this applies.	**Policy 55: Providing for appropriate <u>urban expansion</u> ~~Maintaining a compact, well designed and sustainable regional form~~ – consideration**

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				their main method of management, as the term inappropriate is also often used to signal not all development and adverse effects are to be avoided in recognising and providing for the matters of national importance specified within section 6 of the RMA. We oppose the amendments drafted to clause (b) of Policy 55, clause (d) of Policy 65, and clause (e) of Policy 67. These provisions attempt to give legal status to a document that has no statutory weight under the Act (the WRGF). We explain our reasons for opposing any references to the WRGF within the RPS above, and our reasoning equally applies to the amendments suggested to clause (b) of Policy 55 and clause (d) of Policy 56. Interim strategies and development frameworks in the absence of a Future Development Strategy should be city and district council growth strategies prepared and adopted under the LGA. We also oppose the wording of draft clause (d) as it fails to include the other important considerations identified for responsive planning under Subpart 2, clause 3.8 of the NPS-UD. Significant capacity is not the only consideration when considering out-of-sequence developments. We also note the requirements of the NPS-UD for considering out-of-sequence developments only applies to plan changes, yet the draft changes to the RPS attempt to require this be applied to the consideration of resource consents. This falls beyond the legal remit of the NPS-UD. We recommend the other draft clauses of the policy are considered alongside the requirements of the Act and relevant higher-level statutory planning documents to ensure the verbs used align with these requirements (i.e. the requirement to avoid, without the context of inappropriate being included). With respect to clause (c) of Policy 55, we request the reference to a structure plan is clarified so it is clear who has prepared the structure plan and its legal status i.e. the structure plan has been prepared for inclusion in the district plan. Decision requested: Delete references to resource consents from Policy 55, or remove the parts of Policy 55 that are intended to give effect to NPS- UD Clause 3.8 and include them in draft Policy UD.4 so it becomes a comprehensive policy that gives effect to clause 3.8 of the NPS-UD - unanticipated or out of sequence developments. Delete the list of matters that are to be avoided under Policy 55 clause (a)(ii), or amend the term avoid reflecting the requirements of the RMA and higher-level statutory planning documents through adding the term inappropriate. Delete all references from clause (b) of Policy 55, clause (d) of Policy 56, and clause (e) of Policy 67 to a regional council strategic growth and/or development framework or strategy for the region in the absence of a Future Development Strategy. These references should be to city and district council growth strategies in the absence of a regional Future Development Strategy, not attempting to give legal weight to the WRGF. Clarify structure plan requirements as described in our reasons and discussion. Review use of all verbs in objectives and policies to ensure their legal meaning aligns with the RMA, and they are appropriate with regard to the functions, power and duties of city and	References to other policies of the RPS have been amended to ensure the verbs/direction is consistent. While this does not introduce any further requirement, it is important to include in the policy to ensure transparency and reflect integration. Direct reference to Policy 55(a)(ii) has been added to UD.4 In relation to structure plans, the requirement is that particular regard shall be given to whether a structure plan has been prepared (or should be prepared). While the policy could provide direction on the minimum requirements of structure plans, this may limit the specific requirements which may differ between districts. Reference to the regional strategy (WRGF) is appropriate in the absence of the FDS. It still provides regional direction and consideration of consistency with it is reasonable. Accepting that there could also be local strategies that are more up-to-date and specific to the area, changes are proposed to clause (b) to reference them.	When considering an application for a resource consent, or a change, variation or review of a district plan for *urban* development beyond the region's *urban areas* (as at ~~March 2009~~August 2022), particular regard shall be given to whether: (a) the *urban* ~~proposed~~ *development* ~~is the most appropriate option to achieve Objective 22~~ contributes to establishing or maintaining the qualities of a well-functioning urban environment, including: (i) the *urban development* will be well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors; (ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or resources identified by this RPS, including: 1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29, 2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23, 3. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 25, 4. Protecting historic heritage values as identified by Policy 22, 5. Integrates Te Mana o Te Wai consistent with Policy 42, 6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17. 7. Recognises and provides for values of significance to mana whenua / tangata whenua, 8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and (b) the ~~proposed~~ *urban development* is consistent with any *Future Development Strategy,* or the ~~Council's~~ regional or local strategic growth and/or development framework or strategy that describes where and how future *urban development* should occur in that district or region, should the *Future Development Strategy* be yet to be released; and~~/or~~ (c) a structure plan has been prepared~~.~~; and/or (d) Any *urban development* that would provide for significant development capacity, regardless of if the development was out of sequence or unanticipated by growth or development strategies.

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				district councils.		
S23.87	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 55:	The Trust supports Policy 55.	Noted.	
S11.013	Kāinga Ora	4.2 Regulatory policies - matters to be considered	Policy 55:	Kāinga Ora generally supports this policy but would like the inclusion of wording that requires the need to assess whether allowing out of sequence development compromises development ready land that is provided for within the FDS/Regional strategic and/or development framework. Decision requested: Add a point #9 to bottom: **9. Does not adversely affect the implementation of a proposed development that has been identified within the FDS/Regional strategic and/or development framework by being implemented prior to that development.**	Reject. This is already effectively provided through clause (b). Clause (a)(ii) also refers specifically to existing direction within the RPS.	
S19.38	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy 55:	These matters under (ii) are all listed elsewhere in the RPS - this is a circular policy. Could be an advice note or appendix rather than a policy in its own right.	Reject References to other policies of the RPS have been amended to ensure the verbs/direction is consistent. While this does not introduce any further requirement, it is important to include in the policy to ensure transparency and reflect integration.	
S20.60	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy 55:	No detail.	Reject The policy relies on cross referencing other direction and external strategies rather than providing specific detail in the policy.	
S24.028	Wellington City Council	4.2 Regulatory policies - matters to be considered	Policy 55:	The reference to regional form (in Policy 55) is missing altogether now. These amendments appear to focus on how each identified centre (Wgtn, Lower Hutt, Porirua etc) must ensure well functioning urban environments. How these centres work together as a defined regional urban form is now missing - we are really one connected region. It is important for investment and growth purposes that this hierarchy is maintained and reinforced and that Wellington City is acknowledged as the 'regional centre' being the capital city, and the main employment and growth centre of the region. Decision requested: Establishing and Maintaining well-functioning urban environments a compact, well designed and sustainable regional form - consideration	Accept Changes to title better reflect its intent.	
S9.29	Hutt City Council	4.2 Regulatory policies - matters to be considered	Policy 55:	For (a)(i), if the policy trying to say that developments should be well-connected to the existing or planned urban areas, this should be stated more directly, rather than being housed in a policy about matters that regard should be given to. There is a similar issue for (a)(ii). Decision requested: State the direction given by the policy more clearly, rather than housing it in a policy that is trying to do multiple things.	Wording is appropriate. All matters under Clause (a) are applicable qualities of a well-functioning urban environment.	
S14.055	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 55:	Decision requested: In clause 7, suggest delete the word 'recognise' and just keep the provide for to strengthen the intention.	“recognise and provide for” has been used to ensure it is consistent with Policy 49. We couldn’t delete recognise without being inconsistent with other direction (policy 49 would also need to be amended).	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
Policy UD.4						
S23.88	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy UD.4:	The Trust has an interest in Policy UD.4. The Trust seeks that any proposed development assessed against Policy UD.4 must provide for a well-functioning urban environment, including providing for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. Decision requested: Policy UD.4: Responsive Planning – consideration In considering a change, variation or review of a district plan where the development meets clause (d) of Policy 55, 'significant development capacity' is provided for where all of the following criteria are met: …. (d) provides for mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga;	Reject. This will be provided for in clause (a)(i) which cross-references Policy 55 and Objective 22. While this isn't explicit in Policy UD.4, including this specific reference would require all necessary aspects to be stated.	**Policy UD.3: Responsive planning to developments that provide for significant development capacity – consideration** When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met: (a) the location, design and layout of the proposal: (i) contributes to establishing or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22, (ii) is well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors, (iii) for housing will apply a *relevant residential zone* or other urban zone that provides for *high density development* or *medium density residential development*, (b) The proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage identified in monitoring for: (i) a variety of housing that meets the regional, district, or local shortages of housing in relation to the particular type, size, or format~~,~~ (ii) business space or land of a particular size or locational type, or (iii) community, cultural, health, or educational facilities, and (iv) the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and (c) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution: (i) is of high yield relative to either the forecast demand or the identified shortfall, (ii) will be realised in a timely (i.e., rapid) manner, (iii) is likely to be taken up, and (iv) will facilitate a net increase in district-wide up-take in the short to medium term, (d) required development infrastructure can be provided effectively and efficiently for the proposal, and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term. Explanation Policy UD.3 provides for responsiveness in considering significant development capacity under Policy 55(d) and outlines the criteria that need to be met for a development to be considered to provide 'significant development capacity' as required by Subpart 2 of the National Policy Statement on Urban Development 2020.
S16.38	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy UD.4:	Oppose in part: We oppose clause (a)(iii) as it goes beyond the requirements of the NPS-UD and the RMA by preventing city and district councils from applying urban zones other than those where the Medium Density Residential Standards would be applied. It is not the role of the RPS to determine whether significant development capacity could be realised through other zoning, such as mixed-use zones and other centre zones. City and district councils do not require this degree of direction, and the suggested limitation on how housing may be provided for via zoning is not appropriate or useful for an RPS to specify. We recommend clause (d) is reworded in consultation with city and district councils to ensure it is fit for purpose and provides the necessary degree of discretion and direction for decision makers. Decision requested: Delete clause (a)(iii).	Accept in part Changes have been proposed to this clause to provide for other urban zones.	
S12.024	Ngā Hapū o Ōtaki	4.2 Regulatory policies - matters to be considered	Policy UD.4:	Consideration of cultural values and consent by mana whenua as reciprocal partners should be included in this policy. We ask that you are mindful of what protections are in place during the private fast tracking process for mana whenua values. Decision requested: Policy UD.4: Responsive Planning – consideration In considering a change, variation or review of a district plan where the development meets clause (d) of Policy 55, 'significant development capacity' is provided for where all of the following criteria are met: (a) the location, design and layout of the proposal: … (iv) is supported by mana whenua as reciprocal partners. (c) taking into account any capacity that has been added through a plan change or plan variation process, the proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment and/or Objective 22B, or a shortage identified in monitoring for: .. (iii) community, cultural or educational facilities, and	Accept in part. The change proposed to clause (a) cannot be required for the consideration of plan change requests. This implies a third-party approval in order for the development to be appropriate which is inconsistent with Schedule 1 of the RMA. Accept change to clause (c)(iii).	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S19.39	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy UD.4:	Is this meant to address the out of sequence development requirement of the NPS-UD? It is a policy, not criteria. This doesn't provide any substantive direction on top of what the NPS already says. Other comments: •Chapeau: This should only refer to plan changes, as per policy 8 of the NPSUD. •(b) what does this mean? when? •How can we determine if it will be realised in a timely manner if landowner driven? •That are already in the Plan or consented? Otherwise how would we assess this?	Accept in part. The policy has been amended to be clear of its criteria for consideration. Clause (b) has been amended to clarify and has removed reference to HBL. Evidence for (c) would be provided in the plan change request. Timely manner is provided through the proposed timeframe and is likely to be more applicable to developments that are out of sequence e.g. bringing future development forward. This may also include additional evidence such as economic assessments etc.	
S20.61	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy UD.4:	While this is a requirement for those Councils who are subject to the UD, the criteria set out appear appropriately robust for any substantial unplanned or out of sequence development.	It is noted that this could apply to a development within non-tier 1 districts and even non-urban environment districts (although unlikely).	
S18.16	Waka Kotahi	4.2 Regulatory policies - matters to be considered	Policy UD.4:	Support the intent of this policy	Noted.	
S17.52	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy UD.4:	Agree	Noted.	
S14.056	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy UD.4:	The responsive planning section does not refer to three waters and stormwater. This has been mentioned generally in the clause (d) referring that required development infrastructure can be provided effectively and efficiently for the proposals. This does not say anything about whether it can be provided at all effectively or efficiently.	This is still provided, but rather through Policy 58 for the sequencing of development with infrastructure.	
S9.30	Hutt City Council	4.2 Regulatory policies - matters to be considered	Policy UD.4:	* for (a)(iii) - this seems to rule out mixed use or commercial developments * for (b) - the existing HBA is not necessarily a comprehensive survey of possible shortages and needs and monitoring may not be perfect. Should be open for proposals to make the case that there's a shortage of the type of development being proposed. * for (b)(i) - The term "affordable housing" is vague because it gets used in many different ways. Housing is a whole integrated market and it's simplistic to suggest in the policy that "price range" or "affordability" are inherent features of the development itself, particularly at plan change stage. At the level of a plan change the best you can confidently say is that more houses in general is going to reduce prices due to overall supply and demand. On the other hand if this is intended to refer to cross-subsidised housing, public housing, or other assisted or below-market-rate housing models then that should be explicit. As for public housing or other assisted housing types, GWRC should not direct any policy in this area since it is not funded by GWRC. If this is retained, this should be a separate point to the question of variety. This also is not the right location for a policy direction on variety of housing, as the HBA doesn't model non-market housing demand. * for (b)(iii): this may be too restrictive * for (c)(iv): this will be challenging for applicants to show, and it is unclear what the purpose this will serve. * for (d): it is unclear what effect this is intended to have in practice, but as drafted it is much too restrictive Decision requested:	Accept Changes have largely been accepted as proposed.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				* For (a)(iii) - replace "relevant residential zone" with "relevant residential zone or other urban zone that provides for medium or high density residential development" * For (b) - replace with "taking into account any capacity that has been added through a plan change or variation, the proposal makes a significant contribution to meeting the need for: (a)..." * For (b)(i) - replace with "(i) a variety of housing is provided that meets regional, district, or local shortages for housing of a particular type, size, or format; (ia): the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing" * For (b)(iii) - replace with "community, health, or education facilities, and" * For (c)(iv) - delete * For (d) - replace with "(d) required development infrastructure can be provided effectively and efficiently for the proposal, taking into account that existing or committed infrastructure may already be needed for other feasible and likely to be realised developments"		
Policy 56						
S12.045	Ngā Hapū o Ōtaki	4.2 Regulatory policies - matters to be considered	Policy 56:	Decision requested: (b) the proposal will reduce aesthetic, cultural and open space values in rural areas between and around settlements;	Accept	**Policy 56: Managing development in the rural areas – consideration** When considering an application for a resource consent or a change, variation or review of a district plan, in rural areas (as at ~~March 2009~~August 2022), particular regard shall be given to whether: (a) the proposal will result in a loss of productive capability of the rural area, including cumulative impacts that would reduce the potential for food and other primary production and reverse sensitivity issues for existing production activities, including extraction and distribution of aggregate minerals; (b) the proposal will reduce aesthetic and open space values in rural areas between and around settlements; (c) the proposals location, design or density will minimise demand for non-renewable energy resources; and (d) the proposal is consistent with any *Future Development Strategy*, or the ~~city or district~~ regional or local strategic growth and/or development framework or strategy that addresses future rural development, should the *Future Development Strategy* be yet to be released; or (e) in the absence of such a framework or strategy, the proposal will increase pressure for public services and infrastructure beyond existing infrastructure capacity.
S23.89	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 56:	The Trust supports the reference to climate change as a consideration.	Noted.	
S16.39	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy 56:	Oppose in part: We oppose the list of matters included in clause (a)(ii) of Policy 55 as on our reading they attempt to direct city and district councils on the application of qualifying matters. Determinations on qualifying matters within district plans are not decisions for regional councils. The term avoid needs to be carefully considered. We note section 6 matters do not all require avoidance as their main method of management, as the term inappropriate is also often used to signal not all development and adverse effects are to be avoided in recognising and providing for the matters of national importance specified within section 6 of the RMA. We oppose the amendments drafted to clause (b) of Policy 55, clause (d) of Policy 65, and clause (e) of Policy 67. These provisions attempt to give legal status to a document that has no statutory weight under the Act (the WRGF). We explain our reasons for opposing any references to the WRGF within the RPS above, and our reasoning equally applies to the amendments suggested to clause (b) of Policy 55 and clause (d) of Policy 56. Interim strategies and development frameworks in the absence of a Future Development Strategy should be city and district council growth strategies prepared and adopted under the LGA. We also oppose the wording of draft clause (d) as it fails to include the other important considerations identified for responsive planning under Subpart 2, clause 3.8 of the NPS-UD. Significant capacity is not the only consideration when considering out-of-sequence developments. We also note the requirements of the NPS-UD for considering out-of-sequence developments only applies to plan changes, yet the draft changes to the RPS attempt to require this be applied to the consideration of resource consents. This falls beyond the legal remit of the NPS-UD. We recommend the other draft clauses of the policy are considered alongside the requirements of the Act and relevant higher-level statutory	Reject Reference to the regional strategy (WRGF) is appropriate in the absence of the FDS. It still provides regional direction and consideration of consistency with it is reasonable. Accepting that there could also be local strategies that are more up-to-date and specific to the area, changes are proposed to clause (b) to reference them.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				planning documents to ensure the verbs used align with these requirements (i.e. the requirement to avoid, without the context of inappropriate being included). With respect to clause (c) of Policy 55, we request the reference to a structure plan is clarified so it is clear who has prepared the structure plan and its legal status i.e. the structure plan has been prepared for inclusion in the district plan. Decision requested: Delete references to resource consents from Policy 55, or remove the parts of Policy 55 that are intended to give effect to NPS- UD Clause 3.8 and include them in draft Policy UD.4 so it becomes a comprehensive policy that gives effect to clause 3.8 of the NPS-UD - unanticipated or out of sequence developments. Delete the list of matters that are to be avoided under Policy 55 clause (a)(ii), or amend the term avoid reflecting the requirements of the RMA and higher-level statutory planning documents through adding the term inappropriate. Delete all references from clause (b) of Policy 55, clause (d) of Policy 56, and clause (e) of Policy 67 to a regional council strategic growth and/or development framework or strategy for the region in the absence of a Future Development Strategy. These references should be to city and district council growth strategies in the absence of a regional Future Development Strategy, not attempting to give legal weight to the WRGF. Clarify structure plan requirements as described in our reasons and discussion. Review use of all verbs in objectives and policies to ensure their legal meaning aligns with the RMA, and they are appropriate with regard to the functions, power and duties of city and district councils.		
S17.53	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy 56:	Agree - being looked at in WCDP review.	Noted	
S20.62	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy 56:	Support requirement for substantial development in the rural area to be supported by a higher level framework. However, the policy doesn't adequately capture the transition to urban provided for by the SWDC Spatial Plan which includes some level of urban expansion on non-highly productive soils for some towns. FW5/6: Generally support non-regulatory approaches to promoting water attenuation in the landscape, tank water supplies and other storage (being which is being enabled in the draft District Plan) and support GWRC support of rural land use resilience.	Noted.	
S14.057	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 56:	Decision requested: Mana Whenua and iwi have land in rural areas that was returned through the Deed of Settlement Acts. Policy 56 consideration needs to include the execution of Tino Rangatiratanga on this land and to be able to allow the land aspirations of iwi and Māori is accounted for.	Accept in part This point is accepted; but this has been reflected in Policy UD.2.	
S8.002	Carterton District Council	4.2 Regulatory policies - matters to be considered	Policy 56:	Decision requested: Support this policy as it backs up Wai Combined District Plan work on retaining productive land from ad hoc subdivision. Seeking consideration of NPS on highly productive land, and clarity on whether	Noted The RPS will likely need to be reviewed to given effect to the NPS-HPL in which ever form it comes. This may be determinant on	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				the RPS will be more or less stringent on controlling development in rural areas when it comes out.	the nature of the direction and whether it is specific to "productive land" rather than also providing for "productive potential" which is equally as important. It is noted that current direction for highly productive land under Policy 59 for LUC I-II will also be applicable to this review.	
Policy 57						
S23.90	Ātiawa ki Whakaron gotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 57:	The Trust want to ensure that maximising modal shift from private vehicles to public transport or active modes does not exacerbate existing inequalities. That is, ensuring accessibility for all capabilities - those who cannot easily walk or cycle, ensuring equity for Māori, and those with care-giving responsibilities. For example it is reported that low-income people in some areas consider it essential to own a car, because they have no other way to do what they need to get done in their lives. Work and other activities are not close enough to walk to; the cycling networks are not safe enough; and public transport is neither frequent nor direct for people who do not work in the central city and live close to train lines or rapid bus routes. Regional Council please offer alternative wording to give effect to the Trust comments.	Accept Clause (a) is key in providing for this, noting that "inclusive" has been added to the clause. While mode shift is directed through the policy, it does not preclude current modes, including private vehicle modes, to continue to be provided for. It is accepted that this policy can only enable those outcomes e.g. providing mode options and ensuring public transport is efficient and effective.	**Policy 57: Integrating land use and transportation – consideration** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, require land use and transport planning within the Wellington Region is integrated in a way which: (a) supports a safe, reliable, inclusive and efficient transport network; (b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity; (c) minimises private vehicle travel and trip length while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes; (d) encourages an increase in the amount of travel made by public transport and active modes; (e) provides for well-connected, safe and accessible multi modal transport networks while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical; (f) supports and enables the growth corridors in the Wellington Region, including: (i) Western Growth Corridor – Tawa to Levin; (ii) Eastern Growth Corridor – Hutt to Masterton; (iii) Let's Get Wellington Moving Growth Corridor. ~~to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy:~~ ~~whether traffic generated by the proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network;~~ ~~connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity, open spaces or recreational areas;~~ ~~whether there is good access to the strategic public transport network;~~ ~~provision of safe and attractive environments for walking and cycling; and~~ ~~whether new, or upgrades to existing, transport network infrastructure have been appropriately recognised and provided for.~~
S16.40	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy 57:	Oppose: The proposed shift in the verb used in this policy from having particular regard to the listed matters, to ensuring the listed matters are delivered through resource consents, notices of requirement and plan changes is not possible. Many of the matters listed do not fall within the control of city and district councils. We recommend retaining the existing wording of having particular regard to enable the appropriate case-by-case consideration of these matters by decision makers. Decision requested: Retain existing directive to have particular regard. Delete requirement to ensure.	Accept	
S17.54	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy 57:	Very metro centric. How will this work for the Wairarapa? Decision requested: Further clarity on how this policy can be implemented in the Wairarapa	This policy will also apply in the Wairarapa. While there is not the same transit orientated form in the Wairarapa, mode shift will need to be enabled.	
S19.40	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy 57:	Which consents? Isn't (d) covered by (c)?	Subdivision consent for new urban development.	
S24.029	Wellington City Council	4.2 Regulatory policies - matters to be considered	Policy 57:	Decision requested: The purpose of this amendment is to fully unlock urban development around current and future rapid-transit corridors and other key public transport lines. Urban development based around Levin and Wairarapa doesn't do this, as the rapid transit corridors stop at the end of the metro rail services. WE think the RPS could add policy elsewhere about the location of planned development in these areas (Levin and Wairarapa) in line with WRGF, but they shouldn't be added in with the strengthened policy direction to support and enable urban development around the rapid transit corridors, particularly LGWM.	While this policy is more applicable to high growth areas, supporting mode shift remains relevant for Wairarapa.	
S9.31	Hutt City Council	4.2 Regulatory policies - matters to be considered	Policy 57:	For (d) it is unclear why the RPS would have a goal of increasing the amount of travel made by public transport, walking and cycling in absolute terms, as opposed to using these modes for transport demand that already exists. Decision requested: Replace (d) with "(d) encourages new transport demand to be met through the use of public transport, walking, and cycling"	Accept in part Has been amended to public and active modes of transport.	
Policy 58						

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S23.91	Ātiawa ki Whakarongotai Charitable Trust	4.2 Regulatory policies - matters to be considered	Policy 58:	In principle the Trust supports this policy. The Trust seeks further clarification on how this policy interacts with 'responsiveness planning' in particular subclause (b) (of Policy 58) and Policy UD.4.	Noted	**Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration** When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, require all new urban development including form, layout, location, and timing is sequenced in a way that: (a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and (b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring. ~~particular regard shall be given to whether the proposed subdivision, use or development is located and sequenced to:~~ ~~make efficient and safe use of existing infrastructure capacity; and/or~~ ~~coordinate with the development and operation of new infrastructure.~~
S16.41	Kāpiti Coast District Council	4.2 Regulatory policies - matters to be considered	Policy 58:	Oppose: We note it is not possible for city and district councils to ensure the matters listed in the policy are delivered as part of an application for resource consent, notice of requirement or a plan change. For example, city and district councils do not have any functions, powers or duties under the RMA to ensure development, funding and implementation and operation of low or zero carbon transport and some types of infrastructure is provided for in an area. We recommend the use of all verbs in objectives and policies are carefully checked for their legal meanings under the RMA. We also request every verb chosen does not conflict with the functions, powers and duties of city and district councils under the RMA. We consider it is unrealistic to ensure all infrastructure necessary to support new development as part of a plan change (rezoning) or a resource consent is available, consented, designated, or programmed to be available prior to development occurring. This goes beyond the requirements of clause 3.4 of the NPS-UD. For plan changes in particular, rezoning for the purposes of identifying future urban zones does not require the planning and scheduled delivery of the necessary infrastructure to this degree of detail. We also note public transport necessary to support new development falls beyond the control of city and district councils, so it is entirely inappropriate to require this to be available, consented, designated or programmed prior to development occurring under a district plan. We note in Kāpiti the availability and frequency of public transport to some areas already zoned for additional development such as passenger rail services to Otaki is low. If it was a requirement for city and district councils to ensure public transport is available to serve new development before new development occurs, new development would simply not occur in some parts of the district. Policy 58: (b) Oppose: This statement is not clearly linked to an evidence base that supports it. Decision requested: Delete Policy 58, or amend the verb used to align with what is technically and legally possible for city and district councils to address through their district plan. Consider alternative methods to achieve policy content. Delete draft clause (b) of policy 58. Policy 58: (b) Insert reference to the evidence base that supports this statement, or in the absence of such an evidence base we request the following wording: Inappropriate and poorly managed urban land use and activities in the Wellington region have can damaged, and continue to jeopardise, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increase the exposure of communities to the impacts of climate change.	Accept in part Verb has been amended to require rather than ensure. The policy does not require it to be provided before a rezoning, rather before the development occurs. Planning decisions can require this sequencing to be provided as reflected through conditions of consent or rules/provisions in a plan. Clause (b) is applicable to this policy. There needs to be coordination between ensuing that infrastructure that will service the development will be provided before the development occurs. Without doing so risks isolated and unserviced developments.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S11.007	Kāinga Ora	4.2 Regulatory policies - matters to be considered	Policy 58:	Kāinga Ora generally supports Policy 58 and considers that infrastructure should be planned and provided. The RPS should also direct that infrastructure costs and in turn funding should be identified and planned for.	This is provided for by Clause (a)	
S17.55	Masterton District Council	4.2 Regulatory policies - matters to be considered	Policy 58:	Timing issues re development contributions Has significant implications on capital and time during a regional and national housing crisis	Noted.	
S19.41	Porirua City Council	4.2 Regulatory policies - matters to be considered	Policy 58:	(b) doesn't make sense	Changes to clause (b) look to clarify.	
S20.63	South Wairarapa District Council	4.2 Regulatory policies - matters to be considered	Policy 58:	Support enabling the provision of low/zero carbon transport infrastructure. Support requiring that all relevant infrastructure is available prior to development occurring.	Noted.	
S18.17	Waka Kotahi	4.2 Regulatory policies - matters to be considered	Policy 58:	Include 'services' with public transport infrastructure Decision requested: (b) all infrastructure, including multi modal and public transport infrastructure and services that supports low or zero carbon transport and three waters infrastructure, required to serve new development is available, or is consented, designated or programmed to be available prior to development occurring.	Reject Services are provided through clause (a) of the policy.	
S14.058	Ngāti Toa	4.2 Regulatory policies - matters to be considered	Policy 58:	Decision requested: The part of the Policy 58 that says 'ensure all new urban development including form, layout, location, and timing is sequenced in a way that...' seems to belong to the 'responsive planning' section of the RPS. Co-ordinating land use with development and operation of infrastructure is not just about transport as specified in clause (b).	This does also apply to any responsive planning. This policy would sit alongside UD.4.	
S9.32	Hutt City Council	4.2 Regulatory policies - matters to be considered	Policy 58:	It is unclear whether new urban development includes all new subdivision and land use in an urban environment or just development that expands the urban environment. Decision requested: Clarify the meaning of new urban development.	Removed reference to “new” as this will only be applicable to urban development that requires infrastructure servicing.	
Policy 67						
S16.52	Kāpiti Coast District Council	4.4 Non-regulatory policies	Policy 67:	We oppose the amendments drafted to clause (b) of Policy 55, clause (d) of Policy 65, and clause (e) of Policy 67. These provisions attempt to give legal status to a document that has no statutory weight under the Act (the WRGF). We explain our reasons for opposing any references to the WRGF within the RPS above, and our reasoning equally applies to the amendments suggested to clause (b) of Policy 55 and clause (d) of Policy 56. Interim strategies and development frameworks in the absence of a Future Development Strategy should be city and district council growth strategies prepared and adopted under the LGA. We request this policy be strengthened by more specifically identifying design guides within district plans to apply to medium and high density residential development. This would assist city and district councils to include design guides to help give effect to NPS-UD Policy 1, and Objective 1, and Policy 3 of the MDRS (RMA Schedule 3A, Clause 6(2)(c)) with respect to encouraging development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance.	Accept in part The WRGF remains relevant to this policy. However, as noted above, it is accepted that local strategies and framework should also be recognized. The updated policy provides for both the regional and local strategic growth and/or development framework. Clause (a) has been updated to provide direct reference to high and medium density development. Proposed Method UD.2 assists will giving effect to this.	**Policy 67: Establishing and m~~M~~aintaining the qualities and characteristics of well-functioning urban environments ~~and enhancing a compact, well designed and sustainable regional form~~ – non-regulatory** To establish and maintain ~~and enhance~~ the qualities and characteristics of well-functioning urban environments ~~a compact, well designed and sustainable regional form~~ by: (a) implementing the New Zealand Urban Design Protocol and any urban design guidance that provides for best practice urban design and amenity outcomes, including for *high density development* and *medium density residential development*; (b) promoting best practice on the location and design of rural residential development; (c) recognising and enhancing the role of the region’s open space network; (d) ~~encouraging~~ providing for a range of housing types and developments to meet the community’s social, cultural, and

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
				Decision requested: Delete all references from clause (b) of Policy 55, clause (d) of Policy 56, and clause (e) of Policy 67 to a regional council strategic growth and/or development framework or strategy for the region in the absence of a Future Development Strategy. These references should be to city and district council growth strategies in the absence of a regional Future Development Strategy, not attempting to give legal weight to the WRGF. Amend Policy 67 to highlight the importance of the use of design guides in district plans to establish and maintain well-functioning urban environments.		economic needs, including affordable housing and improve the health, safety and well-being of the community; (e) implementing the actions in the *Future Development Strategy*, or the regional and local strategic growth and/or development framework or strategy that describes where and how future urban development should occur in the region. (f) work together and partner with mana whenua / tangata whenua to prepare papakāinga design guidelines that are underpinned by kaupapa Māori. ~~the Wellington Regional Strategy for the Regional Focus Areas;~~ and ~~safeguarding the productive capability of the rural area.~~ Explanation Policy 67 supports the non-regulatory measures such as urban design guidance and other best practice guidance in contributing to the qualities and characteristics a well-functioning urban environment.
S23.108	Ātiawa ki Whakarongotai Charitable Trust	4.4 Non-regulatory policies	Policy 67:	The Trust support in part the amendments to Policy 67. The Trust seeks that reference is made to mana whenua values associated with urban development. The Trust seek inclusion of new subclause (e) to enable mana whenua to develop design guides for papakāinga in partnership with regional and district councils. Decision requested: Policy 67: Establishing and maintaining well-functioning urban environments - non-regulatory To establish and maintain well-functioning urban environments by: (a) implementing the New Zealand Urban Design Protocol and any urban design guidance that provides for best practice urban design, **and cultural** and amenity outcomes; (b) promoting best practice on the location and design of rural residential development; (c) recognising and enhancing the role of the region's open space network; (d) providing for a range of housing types and developments to meet the community's social, cultural and economic needs, including affordable housing and improve the health, safety and well-being of the community; (e) implementing the actions in the Future Development Strategy, or the regional strategic growth and/or development framework or strategy that describes where and how future urban development should occur in the region; and (f) work together with district councils and partner with mana whenua to prepare papakāinga design guideliness that are underpinned by kaupapa Māori. The guidelines should draw on traditional land use practices and other environment features distinctive to the takiwā. As an ecosystem it should give expression to the whānau/hapū/iwi traditional papakāinga. Mana whenua will be encouraged to prepare devlopment plans for papakāinga that are consistent with these design guides. (g) implementing the actions in the Future Development Strategy, or the regional strategic growth and/or development framework or strategy that describes where and how future urban development should occur in the region; and	Accept in part Change to clause (d) has been made as proposed. Clause (f) is accepted, but it is considered that this is better expressed through the design guidance method.	
S20.76	South Wairarapa District Council	4.4 Non-regulatory policies	Policy 67:	Support enabling urban design qualities for all urban development.	Noted.	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S18.19	Waka Kotahi	4.4 Non-regulatory policies	Policy 67:	Support and encourage accessible developments in this policy Decision requested: (d) encouraging providing for a range of housing types and developments accessible to public transport to meet the community's social and economic needs, including affordable housing and improve the health, safety and well-being of the community;	Noted.	
Method UD.1						
S16.58	Kāpiti Coast District Council	4.5.3 Non-regulatory methods - integrating management	Method UD.1:	Oppose: References to the Wellington Regional Growth Framework, and the suggestion it should be considered an interim Future Development Strategy: We strongly oppose references to the WRGF within the RPS, and in particular the suggestion it forms the interim strategic growth direction for the region prior to the development of a Future Development Strategy (FDS) under the NPS-UD. While a highly useful exercise and useful preparation in advance of a proper FDS, the evidence base and investigation that underpinned the development of the WRGF (and consultation) was not sufficiently robust to suggest it should be used in this way. The development of the WRGF also did not follow the special consultative procedure required for a plan or strategy under the Local Government Act, and it therefore lacks any statutory weight under the RMA as a document prepared under other legislation. References to the WRGF, and the interim legal status the draft RPS Change 1 attempts to give it, undermines and fails to acknowledge existing growth strategies prepared by city and district councils under the LGA. These growth strategies are informed by an evidence base, have been appropriately and competently prepared, widely consulted on and formally adopted. They accordingly carry weight under the RMA when preparing and changing plans (s.74(2)(b)(i)). Decision requested: Delete all references to the WRGF throughout the RPS. References to the direction of the future growth of the Region should be made to the Future Development Strategy under the NPS-UD, and city and district councils growth strategies prepared under the LGA as an interim.	N/A See comments in relation to WRGF in the relevant policies.	**Method UD.2: Future Development Strategy** Prepare a *Future Development Strategy* for the Wellington Region in accordance with Subpart 4 of the National Policy Statement for Urban Development 2020. The *Future Development Strategy* will set out the high-level vision for accommodating urban growth over the long term, and identifies strategic priorities to inform other development-related decisions, such as: (a) district plan zoning and related plan changes; (b) priority outcomes in long-term plans and infrastructure strategies, including decisions on funding and financing; and (c) priorities and decisions in regional land transport plans. The *Future Development Strategy* will provide a framework for achieving Well-Functioning Urban Environments in the Wellington Region, including specifying how and where future growth will occur to provide for sufficient capacity to meet future growth needs over the next 30 years. *Implementation: Wellington Regional Council and city and district councils (via the Wellington Regional Leadership Committee)*
S17.64	Masterton District Council	4.5.3 Non-regulatory methods - integrating management	Method UD.1:	Agree - WCDP review in line with this.	Noted	
S20.91	South Wairarapa District Council	4.5.3 Non-regulatory methods - integrating management	Method UD.1:	Support the development of a Future Development Strategy for the region. Support for the method. We seek enabling inclusion in regional Future Development Strategy for our transit oriented growth nodes, Featherston and Woodside.	Noted	
S14.069	Ngāti Toa	4.5.3 Non-regulatory methods - integrating management	Method UD.1:	No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	While we haven't provided the specific detail in the method, this is provided for through subpart 4 of the NPS-UD. This also outlines the engagement process that is required.	
Method UD.2						
S23.123	Ātiawa ki Whakaron	4.5.3 Non-regulatory	Method UD.2:	The Trust seeks the changes in the adjacent column to this method.	Accept	

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
	gotai Charitable Trust	methods - integrating management		Decision requested: Method UD.2: Development manuals and design guides Prepare development manuals and design guidance to allow and encourage development which is consistent with Objective 22, Policy 54, CC.3, Policy 67, Policy 49 and FW.1. Implementation: Wellington Regional Council and city and district councils		**Method UD.1: Development manuals and design guides** Prepare the following development manuals and design guidance: (a) Urban design guidance to provide for best practice urban design and amenity outcomes in accordance with Policy 67(a); (b) Papakāinga design guidance that are underpinned by Kaupapa which is Māori in partnership with Mana Whenua in accordance with Policy 67(f); and (c) Urban design guidance and development manuals to assist developers in meeting Policy CC.14 and Policy FW.3. *Implementation: Wellington Regional Council and city and district councils (via the Wellington Regional Leadership Committee)*
S17.65	Masterton District Council	4.5.3 Non-regulatory methods - integrating management	Method UD.2:	Agree - but clarity sought on some aspects e.g. Policy FW.1 Decision requested: Further clarity is required	This guidance will be led by Greater Wellington and will build on guidance that is currently provided through Wellington Waters guidance.	
S20.92	South Wairarapa District Council	4.5.3 Non-regulatory methods - integrating management	Method UD.2:	support development of carbon offsetting advice. Must include limits on offsetting and must also ensure equitable social, cultural and economic equity in outcomes. requiring the production of Development manuals and design guides that are consistent with Objective 22, policy 54 CC3 and FW1 requires more explanation and should take into account our comments on those points.	Accept Method has been revised to clarify the requirements.	
S14.070	Ngāti Toa	4.5.3 Non-regulatory methods - integrating management	Method UD.2:	No mention of iwi and tangata whenua in these methods and how they impact iwi, hāpu and Māori.	Accept This has been added and relates back to the addition to Policy 67(f).	
Definitions						
S11.015	Kāinga Ora	Appendix 3: Definitions	Appendix 3: Definitions	There is currently no definition within the draft for this term. Wording suggested taken from the National Planning Standards. Decision requested: Areas suitable for urbanisation in the future and for activities that are compatible with and do not compromise potential future urban use.	Accept that the national planning definition should prevail. However, it is not considered necessary to add this definition given it is not referenced in the draft policy.	
S9.36	Hutt City Council	Appendix 3: Definitions	Intensification	It is unhelpful to define intensification as it is likely to cause problems where TAs have chosen to go above the minimum requirements of the NPS-UD Decision requested: Delete definition	Deleted and replaced with definitions for high and medium density residential development.	
S24.033	Wellington City Council	Appendix 3: Definitions	Strategic Transport network	Should account for proposed rapid transit and possibly other strategic transport as in NPS-UD definition. For example LGWM MRT. Also the RLTP date is 2015. Decision requested: Add in something like (b) All future rapid transit services with rapid transit stops that are identified in the Regional Land Transport Plan. Update the RLTP reference to 2021.	Noted. The definition of the strategic transport plan is updated once the RLTP is operative (2021). The proposed rapid transit service is not in the operative document. See comments for RSI table.	
S24.034	Wellington City Council	Appendix 3: Definitions	Town centres	Should reference the Planning Standards Decision requested: "Has the same meaning as in Standard 8 of the National Planning Standards: ..."	Town centre definition is no longer referenced with proposed changes to Policy 30.	Remove definition for town centre.
S24.034	Wellington City Council	Appendix 3: Definitions	Metropolitan centres or Metropolitan zones	Should reference the Planning Standards Decision requested: "Has the same meaning as in Standard 8 of the National Planning Standards: ..."	Accept.	Metropolitan centre zone: Has the same meaning as in Standard 8 of the National Planning Standards: Areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments.

Submission Point	Submitter	Section	Provision	Feedback on provision	Response	New draft provisions drafted from original RPS
S12.058	Ngā Hapū o Ōtaki	Appendix 3: Definitions	Metropolitan centres or Metropolitan zones	Decision requested: Areas used predominantly for a broad range of commercial, community, cultural, recreational and residential activities. The zone is a focal point for sub-regional urban catchments	Reject This definition is from the NZ Planning Standards and is unable to be adjusted.	

Appendix E – Parts of RPS Change 1 subject to the Freshwater Planning Process

Introduction

1. Regional councils must follow the consultation process outlined in Schedule 1 of the Resource Management Act (RMA) following notification of a planning instrument for changes to regional plans or policy statements. Under section 80A of the Resource Management Act (RMA), the Freshwater Planning Process (FPP) is now required to be followed when preparing, changing or varying a plan or policy statement for those parts of the change that are a freshwater planning instrument, which:

    - Give effect to the NPS-FM, or
    - Otherwise relate to freshwater.

2. Regional councils must determine and justify which parts of a regional plan or policy statement change form part of a freshwater planning instrument and are therefore subject to the FPP.

Otago Regional Council High Court Proceedings

3. On 22 July 2022, the High Court released a decision regarding the Proposed Regional Policy Statement for the Otago Region - *Otago Regional Council v Royal Forest & Bird Protection Society of NZ Inc* [2022] NZHC 1777 *(the Decision)*. Otago Regional Council notified their Regional Policy Statement as a freshwater planning instrument in 2021. The High Court proceedings were regarding declarations made by Otago Regional Council that the whole of Proposed Regional Policy Statement was a freshwater planning instrument and therefore subject to the FPP.

4. The Decision declared that Otago Regional Council applied Section 80A of the RMA in error, and that there are matters in the Proposed Regional Policy Statement not intended to be captured by the Freshwater Planning Process. Otago Regional Council must now go through a detailed process of determining which parts should form the freshwater planning instrument.

5. The Decision found that to meet the criteria for the Freshwater Planning Process, parts of an RPS must:

    - '…directly relate to the maintenance or enhancement of freshwater quality of quantity' – *paragraph 192*
    - '…relate directly to matters that will impact on the quality and quantity of freshwater, including groundwater, lakes, rivers and wetlands' – *paragraph 202*

6. The above qualifiers also apply to the NPS-FM; so only provisions that give effect to freshwater quality or quantity parts of the NPS-FM are deemed to qualify for the Freshwater Planning Process. The Decision also stated that:

    > *Parts of a proposed regional statement cannot be treated as parts of a freshwater planning instrument simply because there is some connection to freshwater through the concepts of Te Mana o te Wai, ki uta ki tai or the integrated management of natural and physical resources* (paragraph 206), and
    >
    > *This does not mean that the fundamental concept of Te Mana o te Wai, ki uta ki tai and integrated management of natural resources can be disregarded either in the planning process in pt 1 of sch 1 or in the freshwater planning process* (paragraph 207).

7. The Decision specified that if a provision is *'concerned with sea water'*, it is not eligible to be considered freshwater related.

Process undertaken for Proposed Change 1 for the Regional Policy Statement for the Wellington Region (Proposed RPS Change 1)

8. The Decision represents relevant precedent for Proposed RPS Change 1. It seeks to clarify how regional councils should apply the criteria for determining the scope of a freshwater planning instrument - namely that each provision should have a direct relationship to freshwater quality or quantity. This means that the relationship between a provision and the impact on freshwater quality or quantity should be clearly connected, rather than more obliquely (i.e. requiring several steps to show the connection). The Decision maintains that it is up to regional councils to determine and justify a connection to freshwater for each provision.
9. Greater Wellington will be the first regional council to use the Freshwater Planning Process following Otago Regional Council. In light of the recent High Court decision, each provision has been assessed to determine which parts of Proposed RPS Change 1 meet at least one of the tests now required to form part of a freshwater planning instrument:
    - give effect to parts of the NPS-FM that regulate activities because of their effect on the quality or quantity of freshwater, or
    - relate directly to matters that will impact on the quality or quantity of freshwater.
10. 'Freshwater' is defined in the RMA as, 'all water except coastal water and geothermal water'. 'Freshwater quality and quantity' is not defined in the Decision but has been considered by Council to encompass freshwater ecosystem health, including habitat, aquatic life and ecological processes. It is a measure of, and intrinsically connected to, freshwater quality. Therefore, in the following analysis and justification any matters directly impacting freshwater ecosystem health are directly impacting the quality and quantity of freshwater. The reasons for this approach include:
    - Te Mana o Te Wai, the fundamental concept for freshwater management in the NPS-FM 2020, prioritises the health and well-being of water bodies and freshwater ecosystems. Freshwater ecosystem health is central in the objective and policies of the NPS-FM.
    - Water quality and quantity are two of five biophysical components contributing to freshwater ecosystem health, as outlined in Appendix 1A of the NPS-FM. The others are habitat, aquatic life and ecological processes, which each have relevant attributes under the National Objectives Framework. The NPS-FM is therefore clearly about more than just water quality and quantity, and to separate them from other components of freshwater ecosystem health would not be giving effect to the NPS-FM.
    - Freshwater hearings panels must collectively have knowledge and expertise in relation to 'freshwater quality, quantity, and ecology' under Section 59(6)(b) of Schedule 1 of the RMA. This explicitly states that the FPP includes other matters relating to freshwater ecosystem health beyond water quality and quantity.
11. Consideration of relationship to freshwater has been undertaken at a provision level without splitting provisions. If a provision contains a matter deemed to impact on freshwater quality or quantity, that whole provision has been included in the freshwater planning instrument even if it also relates to other matters. This is because it can no longer be argued that the provision does not directly relate to freshwater, and regional councils must put freshwater-related provisions through the FPP. Breaking provisions up and putting them through different Schedule 1 processes would lead to unworkable outcomes whereby different parts of provisions could become disconnected.
12. In some instances, consideration of how a provision relates to other provisions has been necessary. For example, a method not itself directly related to freshwater, such as Method FW.2 on joint processing of consents, may make a crucial contribution to achieving freshwater objectives on protecting and enhancing freshwater quality and quantity and must therefore also be in the

freshwater planning instrument. However, the connections between provisions alone could not be used to justify a direct relationship to freshwater, because the Decision clearly states the need for provision-level assessment.

13. In order for the objectives, policies or methods in the freshwater planning instrument to stand up, any new or amended definitions for terms used in those provisions must also be in the freshwater planning instrument.

14. Considering the remaining uncertainty and lack of precedent for undertaking provision-by-provision assessment for a change to a regional policy statement, a holistic (to the extent possible) approach to applying the Decision has been taken. This is because:

    - NPS-FM Policy 3 provides clear direction to manage the effects on freshwater in an integrated way, on a whole-of-catchment basis.
    - Taking a holistic and integrated approach is aligned with Te Ao Māori and genuinely giving effect to the NPS-FM.

Provisions forming part of the freshwater planning instrument with justification

15. Part of Proposed RPS Change 1 will be subject to the Freshwater Planning Process. These provisions are identified by a freshwater symbol FW in the Proposed RPS Change 1 document. All remaining provisions will go through the standard consultation process under Part 1 of RMA Schedule 1. Justification for each provision is provided in Table E-3.

16. Proposed RPS Change 1 includes new, amended and removed provisions relating to:

    - Te Mana o Te Wai
    - Indigenous ecosystems
    - Natural hazards
    - Urban development
    - Climate change mitigation, resilience and adaptation
    - Nature-based solutions
    - Integrated management
    - Natural character in the coastal environment
    - Regionally significant infrastructure.

17. By count, 66% of the provisions in Proposed RPS Change 1 form part of the freshwater planning instrument and will be subject to the Freshwater Planning Process. Tables E-1 and E-2 show how this is split across provision type and Section 32 topic.

    Table E-1: Proportions of each provision type forming part of the freshwater planning instrument and subject to the FPP.

Provision type	Proportion (by count) subject to FPP
Objective	67%
Policy	66%
Method	53%
Definition	76%
Other (issue, introductory text, anticipated environment outcome)	65%
Total	66%

Table E-2: Proportions of each Section 32 topic forming part of the freshwater planning instrument and subject to the FPP.

Section 32 topic	Proportion (by count) subject to FPP
Integrated management	100%
Climate change general	48%
Climate change and enhancing sinks (nature-based solutions)	100%
Climate change and natural hazards, adaptation and resilience	47%
Climate change and transport	0%
Climate change and agriculture	40%
Climate change and organic waste, energy and industrial processes	23%
Natural character in the coastal environment	0%
Te Mana o Te Wai	100%
Indigenous ecosystems	100%
Urban development	56%
Regionally significant infrastructure	100%

Urban development

18. Proposed RPS Change 1 has primarily been driven by implementation of the NPS-FM and the NPS-UD equally. One of the key objectives of the amended and new urban development and freshwater provisions is to manage the adverse effects of urban development on freshwater bodies. The need for this to occur is supported by the National Objectives Framework recently published by the Ministry for the Environment:

19. "To give effect to Te Mana o te Wai, [city and district] councils must consider matters such as how urban growth and increases in impervious surfaces will impact on stormwater flows, how stormwater affects the water bodies it is discharged to, and methods to manage urban growth and stormwater discharge. The identification and control of urban growth areas must prioritise the health and well-being of water bodies.'186

20. Under Section 30 of the RMA regional councils must control the use of land for the maintenance and enhancement of freshwater quality and quantity. The connection between land use and freshwater quality and quantity is inherent in regional council functions and must be accounted for.

21. Objective 22, as proposed to be amended through Proposed RPS Change 1, articulates the characteristics and qualities of well-functioning urban environments. Clause (d) prioritises the 'protection and enhancement of the quality and quantity of freshwater' as a part of doing so. Provisions that are contributing to achieving well-functioning urban environments are therefore deemed to relate directly to matters that will impact on the quality and quantity of freshwater. Provisions that relate to other aspects of urban development, while they do relate to freshwater, are not considered to have a clearly direct relationship to meet the Decision's criteria for the FPP.

22. The proposed Objective 22 wording 'protection and enhancement of freshwater quality and quantity' has been adopted for all justification instead of the wording from the Decision, 'maintenance and enhancement of freshwater quality and quantity'.

[186] Page 8 of Guidance on the National Objectives Framework of the National Policy Statement for Freshwater Management 2020.

Indigenous Ecosystems

23. All indigenous ecosystems provisions have been assessed individually and deemed to directly relate to protecting and enhancing freshwater quality and quantity. The operative Regional Policy Statement for the Wellington Region has a chapter on indigenous ecosystems which includes coastal, terrestrial and aquatic ecosystems. These provisions have often been drafted with freshwater ecosystems explicitly in mind.

24. As outlined in paragraph 10, freshwater ecosystems are intrinsically and directly linked to water quality and quantity. Freshwater Objective 13, 'The region's rivers, lakes and wetlands support healthy functioning ecosystems' connects the indigenous ecosystems and freshwater chapters. Some indigenous ecosystems methods such as Methods 32 and 53 contribute to achieving Objective 13.

Water supply

25. All provisions relating directly to water supply, efficient water use and water conservation are deemed to directly relate to protecting and enhancing freshwater quantity.

Nature-based solutions

26. All provisions relating to nature-based solutions have been deemed to be directly freshwater related. Many nature-based solutions directly protect, enhance or restore freshwater ecosystems, improve freshwater quality and benefit water flows and levels.

Implications of doing two processes

27. Officers recognise that splitting provisions written to be considered and decided on together, and putting them through different planning processes, increases the risk of the loss of integration once provisions are operative. The process can be influenced to mitigate this risk. Officers will recommend to Council that the hearing panels for both processes have overlapping membership to maintain consistency, as is suggested by the Ministry for the Environment's technical guidance on FPP.

28. There are two tables in Proposed RPS Change 1 (Table 1A and 8(a)) which contain some objectives subject to the FPP and others subject to Part 1 Schedule 1. Hearing panels will need to consider different parts of these tables under the two processes depending on each objective. For example, parts of Table 1A relevant to objectives CC.1, CC.4 and CC.5 would be considered by the freshwater hearing panel, and the rest of the table under objectives CC.2, CC.3, CC.6, CC.7 and CC.8 would be considered by the standard hearing panel.

Table E-3 Justification for all provisions in Proposed RPS Change 1, either going through Freshwater Planning Process (FPP) or Part 1 Schedule 1 (P1S1).

Provision	**Process**	**Justification**
Chapter 3: Resource management issues, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement		
Overarching Issue 1	FPP	Issue discusses water degradation. It therefore directly relates to matters impacting freshwater quality and quantity.
Overarching Issue 2	FPP	Issue discusses additional pressure on natural environments, which directly impacts freshwater quality and quantity.
Overarching Issue 3	FPP	Mana whenua / tangata whenua decision-making and values focus largely on freshwater matters and are therefore directly related to matters that will impact freshwater quality or quantity. For Māori, water is the

Provision	Process	Justification
		essence of all life, akin to the blood of Papatūānuku who supports all people, plants and wildlife.
Overarching Objective A	FPP	Objective seeks to protect freshwater quality and quantity as part of achieving the qualities and characteristics of well-functioning urban environments, protecting and enhancing mahinga kai, and recognising the relationship between freshwater and other parts of the natural and built environment.
Chapter 3.1A: Climate change		
Climate change introductory text	P1S1	Not directly related to freshwater quality or quantity.
Climate Change Issue 1	P1S1	Not directly related to freshwater quality or quantity.
Climate Change Issue 2	FPP	Issue discusses impacts on natural ecosystem health, including freshwater ecosystem health, which is intrinsically and directly linked to impacts on freshwater quality and quantity.
Climate Change Issue 3	FPP	Issues discusses impacts on mahinga kai and water security, which directly relates to impacts on freshwater quality and quantity. Mahinga kai is also a compulsory value in NPS-FM Appendix 1A.
Climate Change Issue 4	P1S1	Not directly related to freshwater quality or quantity.
Climate Change Issue 5	FPP	Issue discusses matters directly related to freshwater quality and quantity.
Climate Change Issue 6	P1S1	Not directly related to freshwater quality or quantity.
Table 1A	Partly FPP, partly P1S1	Table contains some objectives directly related to freshwater quality and quantity. The parts relating to objectives going though FPP will also go through FPP.
Objective CC.1	FPP	Sustainable freshwater management directly relates to protecting and enhancing freshwater quality and quantity.
Objective CC.2	P1S1	Not directly related to freshwater quality or quantity.
Objective CC.3	P1S1	Not directly related to freshwater quality or quantity.
Objective CC.4	FPP	Nature-based solutions by definition must include co-benefits for indigenous biodiversity. Many nature-based solutions directly protect, enhance or restore freshwater ecosystems, improve freshwater quality and benefit water flows and levels. For example, requiring water-sensitive urban design in built environments will improve freshwater quality and attenuate flood flows.
Objective CC.5	FPP	Benefits to water quality directly relates to protecting and enhancing freshwater quality and quantity.
Objective CC.6	P1S1	Not directly related to freshwater quality or quantity.
Objective CC.7	P1S1	Not directly related to freshwater quality or quantity.
Objective CC.8	P1S1	Not directly related to freshwater quality or quantity.
Chapter 3.3: Energy, infrastructure and waste		
Energy, infrastructure and waste introductory text	P1S1	Not directly related to freshwater quality or quantity.

Provision	Process	Justification
Table 3	P1S1	Not directly related to freshwater quality or quantity.
Chapter 3.4: Fresh water (including public access)		
Freshwater introductory text	FPP	Text discusses matters directly related to freshwater quality and quantity and giving effect to the NPS-FM.
Table 4	FPP	Table contains objectives directly related to freshwater quality and quantity.
Objective 12	FPP	Te Mana o Te Wai directly relates to protecting and enhancing freshwater quality and quantity.
Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	FPP	Expressions of Te Mana o Te Wai directly relate to protecting and enhancing freshwater quality and quantity.
Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	FPP	Expressions of Te Mana o Te Wai directly relate to protecting and enhancing freshwater quality and quantity.
Chapter 3.6: Indigenous ecosystems		
Indigenous ecosystems introductory text	FPP	Text discusses matters directly related to freshwater quality and quantity and giving effect to the NPS-FM.
Indigenous Ecosystems Issue 1	FPP	Issue discusses threatened indigenous ecosystems including wetlands and lowland streams, and impacts on mahinga kai. It therefore directly relates to matters impacting freshwater quality and quantity.
Indigenous Ecosystems Issue 2	FPP	Degrading indigenous ecosystems includes freshwater ecosystems. It therefore directly relates to matters impacting freshwater quality and quantity.
Indigenous Ecosystems Issue 3	FPP	Managing indigenous ecosystems includes freshwater ecosystems. It therefore directly relates to matters impacting freshwater quality and quantity.
Table 6(a)	FPP	Table contains objectives directly related to freshwater quality and quantity.
Objective 16	FPP	Indigenous ecosystem health includes freshwater ecosystem health, which is intrinsically and directly linked to protecting and enhancing freshwater quality and quantity.
Objective 16A	FPP	Indigenous ecosystem health includes freshwater ecosystem health, which is intrinsically and directly linked to protecting and enhancing freshwater quality and quantity.
Objective 16B	FPP	Indigenous ecosystem health includes freshwater ecosystem health, which is intrinsically and directly linked to protecting and enhancing freshwater quality and quantity.
Objective 16C	FPP	Community and landowner values relating to indigenous biodiversity are intrinsically and directly linked to protecting and enhancing freshwater quality and quantity. Efforts supported by this objective often include fencing, wetland restoration and riparian planting among other actions.
Chapter 3.8: Natural hazards		

Provision	Process	Justification
Natural Hazards introductory text	P1S1	Not directly related to freshwater quality or quantity.
Natural Hazards Issue 1	P1S1	Not directly related to freshwater quality or quantity.
Natural Hazards Issue 3	FPP	Issue discusses pressure on water resources. It therefore directly relates to matters impacting freshwater quality and quantity.
Table 8(a)	Partly FPP, partly P1S1	Table contains some objectives directly related to freshwater quality and quantity. The parts relating to objectives going though FPP will also go through FPP.
Objective 19	P1S1	Not directly related to freshwater quality or quantity.
Objective 20	FPP	Objective seeks for impacts on Te Mana o Te Wai, natural processes and indigenous ecosystems to be minimised, which include freshwater processes and ecosystems. It therefore directly relates to activities which impact freshwater quality and quantity.
Objective 21	P1S1	Not directly related to freshwater quality or quantity.
Chapter 3.9: Regional form, design and function		
Regional form, design and function introductory text	FPP	Text discusses matters directly related to freshwater quality and quantity as part of achieving the characteristic and qualities and well-functioning urban environments.
Urban Development Issue A	P1S1	Not directly related to freshwater quality or quantity.
Urban Development Issue B	FPP	Issue discusses degradation of freshwater ecosystems and mana whenua / tangata whenua relationships to culture, land, water, sites, wāhi tapu and other taonga. It therefore directly relates to matters impacting freshwater quality and quantity.
Urban Development Issue 1	FPP	Mana whenua / tangata whenua cultural practices and wellbeing relate directly to freshwater quality and quantity.
Urban Development Issue 2	FPP	Issue discusses three waters infrastructure and mana whenua / tangata whenua relationships to culture, land, water, sites, wāhi tapu and other taonga. It therefore directly relates to matters impacting freshwater quality and quantity.
Table 9	FPP	Table contains objectives directly related to freshwater quality and quantity.
Objective 22	FPP	Clause (d) prioritises the protection and enhacement of freshwater quality and quantity as a characteristic of well-functioning urban environments. This protection of freshwater therefore represents a central part of the how the characteristics and qualities of well-functioning urban environments are articulated throughout RPS Change 1. Policies

Provision	Process	Justification
Objective 22B	FPP	Objective seeks to manage impacts on significant values and features identified in the RPS, which include historic heritage values, outstanding natural features and landscapes and special amenity landscapes, indigenous ecosystems and habitats, and values of rivers and lakes directly related to freshwater quality and quantity. Matters directly impacting freshwater quality and quantity therefore represent at least half of the values and features protected by this policy.
Chapter 4.1: Regulatory policies		
Policy 2: Reducing adverse effects of the discharge of odour, smoke, dust and fine particulate matter, and reducing greenhouse gas emissions – regional plans	P1S1	Not directly related to freshwater quality or quantity.
Policy 3: Protecting high natural character in the coastal environment – district and regional plans	P1S1	Not directly related to freshwater quality or quantity.
Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – regional and district plans	P1S1	Not directly related to freshwater quality or quantity.
Policy 9: Promoting greenhouse gas emission reduction and uptake of low emission fuels – Regional Land Transport Plan	P1S1	Not directly related to freshwater quality or quantity.
Policy 10: Promoting travel demand management – district plans and the Regional Land Transport Strategy	P1S1	Not directly related to freshwater quality or quantity.
Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation – district plans	P1S1	Not directly related to freshwater quality or quantity.
Policy 12: Management of water bodies – regional plans	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Policy 13: Allocating water – regional plans	FPP	Directly related to protecting and enhancing freshwater quantity.
Policy 14: Urban development effects on freshwater and the coastal marine area – Regional plans	FPP	Directly related to protecting and enhancing freshwater quality and quantity through urban development.
Policy 15: Managing the effects of earthworks and vegetation disturbance – district and regional plans	FPP	Directly related to protecting and enhancing freshwater quality.
Policy 17: Take and use of water for the health needs of people – regional plans	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Policy 18: Protecting aquatic and restoring ecological function health of water bodies – regional plans	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans	FPP	Indigenous ecosystems and habitats to be identified in Policy 23 include freshwater ecosystems which are intrinsically linked to protecting and enhancing freshwater quality and quantity.

Provision	Process	Justification
Policy 24: Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans	FPP	Indigenous ecosystems and habitats to be protected in Policy 24 include freshwater ecosystems which are intrinsically linked to protecting and enhancing freshwater quality and quantity.
Policy 29: Managing subdivision, use and development in areas at risk from natural hazards – district and regional plans	P1S1	Not directly related to freshwater quality or quantity.
Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres – district plans	P1S1	Not directly related to freshwater quality or quantity.
Policy 31: Identifying and promoting a range of building heights and density – district plans	FPP	The qualities and characteristics of well-functioning urban environments, as articulated in Objective 22, include protecting and enhancing freshwater quality and quantity.
Policy 32: Identifying and protecting key industrial-based employment locations – district plans	FPP	The qualities and characteristics of well-functioning urban environments, as articulated in Objective 22, include protecting and enhancing freshwater quality and quantity.
Policy 33: Supporting well-functioning urban environments and a reduction in transport related greenhouse gas emissions – Regional Land Transport Strategy Plan	FPP	The qualities and characteristics of well-functioning urban environments, as articulated in Objective 22, include protecting and enhancing freshwater quality and quantity.
Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure – district and regional plans	P1S1	Not directly related to freshwater quality or quantity.
Policy CC.2: Travel demand management plans – district plans	P1S1	Not directly related to freshwater quality or quantity.
Policy CC.3 Enabling a shift to low and zero-carbon emission transport – district plans	P1S1	Not directly related to freshwater quality or quantity.
Policy CC.4: Climate-resilient urban areas – regional and district plans	FPP	The qualities and characteristics of well-functioning urban environments, as articulated in Objective 22, include protecting and enhancing freshwater quality and quantity.
Policy CC.5: Avoid increases in agricultural gross biogenic methane emissions– regional plan	P1S1	Not directly related to freshwater quality or quantity.
Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land – regional plans	FPP	Targeting areas where sediment water quality targets are not reached relates directly to protecting and enhancing freshwater quality.
Policy CC.7: Protecting, restoring, and enhancing ecosystems and habitats that provide nature-based solutions to climate change – district and regional plans	FPP	Nature-based solutions often directly protect, enhance or restore freshwater ecosystems, improve freshwater quality and benefit water flows and levels. In built environments, water quality and water attenuation are particularly relevant issues managed by this policy.
Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting – district and regional plans	P1S1	Not directly related to freshwater quality or quantity.

Provision	Process	Justification
Policy EIW.1: Promoting affordable high quality active mode and public transport services – Regional Land Transport Plan	P1S1	Not directly related to freshwater quality or quantity.
Policy FW.1: Reducing water demand – regional plans	FPP	Directly related to protecting and enhancing freshwater quantity.
Policy FW.2: Reducing water demand – district plans	FPP	Directly related to protecting and enhancing freshwater quantity.
Policy FW.3: Urban development effects on freshwater and the coastal marine area – district plans	FPP	Directly related to protecting and enhancing freshwater quality and quantity through urban development.
Policy FW.4: Financial contributions for urban development – district plans	FPP	Directly related to protecting and enhancing freshwater quality and quantity through urban development.
Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – district and regional plans	FPP	Supporting sustainable customary use, including for mahinga kai and taonga, directly relates to protecting and enhancing freshwater quality and quantity. Mahinga kai is also a compulsory value in NPS-FM Appendix 1A.
Policy UD.1: Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land – district plans	P1S1	Not directly related to freshwater quality or quantity.
Chapter 4.2: Matters to be considered		
Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration	P1S1	Not directly related to freshwater quality or quantity.
Policy 40: Protecting and enhancing the health and well-being of water bodies and freshwater ecosystems – consideration	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Policy 41: Controlling the effects of earthworks and vegetation disturbance – consideration	FPP	Directly related to protecting and enhancing freshwater quality.
Policy 42: Effects on freshwater and the coastal marine area from urban development – consideration	FPP	Directly related to protecting and enhancing freshwater quality and quantity through urban development.
Policy 43: Protecting aquatic ecological function of water bodies – consideration	FPP	Freshwater ecosystem health is intrinsically and directly linked to freshwater quality and quantity.
Policy 44: Managing water takes and use to give effect to Te Mana o te Wai – consideration	FPP	Directly related to protecting and enhancing freshwater quantity.
Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values – consideration	FPP	Freshwater ecosystem health is intrinsically and directly linked to freshwater quality and quantity, and clause (c) discusses wetlands.
Policy 51: Minimising the risks and consequences of natural hazards – consideration	P1S1	Not directly related to freshwater quality or quantity.

Provision	Process	Justification
Policy 52: Minimising adverse effects of hazard mitigation measures – consideration	FPP	Policy seeks to protect and enhance Te Mana o Te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity, which directly relate to protecting freshwater quality and quantity. Mahinga kai is also a compulsory value in NPS-FM Appendix 1A.
Policy 55: Urban expansion - consideration	FPP	Policy integrates Te Mana o Te Wai and protecting indigenous ecosystems, which include freshwater ecosystems, as part of achieving well-functioning urban environments in urban expansion. This relates directly to protecting and enhancing freshwater quality and quantity.
Policy 56: Managing development in the rural areas – consideration	P1S1	Not directly related to freshwater quality or quantity.
Policy 57: Integrating land use and transportation – consideration	P1S1	Not directly related to freshwater quality or quantity.
Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration	P1S1	Not directly related to freshwater quality or quantity.
Policy IM.1: Integrated management - ki uta ki tai – consideration	FPP	Policy seeks to protect freshwater quality and quantity by recognising the relationship between freshwater and other parts of the natural and built environment. Mana whenua / tangata whenua decision making and Mātauranga focus largely on freshwater matters, and are therefore directly related to matters that will impact freshwater quality and quantity.
Policy IM.2: Equity and inclusiveness – consideration	FPP	Clause (c) seeks for environmental issues, which include freshwater quality and quantity, not to be exacerbated. This relates directly to protecting and enhancing freshwater quality and quantity.
Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure – consideration	P1S1	Not directly related to freshwater quality or quantity.
Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions – consideration	P1S1	Not directly related to freshwater quality or quantity.
Policy CC.11: Encouraging whole of life carbon emissions assessment – consideration	P1S1	Not directly related to freshwater quality or quantity.
Policy CC.12: Protect, enhance and restore ecosystems that provide nature-based solutions to climate change – consideration	FPP	Nature-based solutions by definition must include co-benefits for indigenous biodiversity. Many nature-based solutions directly protect, enhance or restore freshwater ecosystems, improve freshwater quality and benefit water flows and levels. For example, requiring water-sensitive urban design in built environments will improve freshwater quality and attenuate flood flows.
Policy CC.13: Managing agricultural gross biogenic methane emissions – consideration	P1S1	Not directly related to freshwater quality or quantity.

Provision	Process	Justification
Policy CC.14: Climate-resilient urban areas – consideration	FPP	Policy relates directly to freshwater quality and quantity, including the application of water sensitive urban design and water capture to benefit freshwater.
Policy FW.5: Water supply planning for climate change and urban development – consideration	FPP	Directly related to protecting and enhancing freshwater quantity.
Policy IE.2: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – consideration	FPP	Supporting sustainable customary use, including for mahinga kai and taonga, directly relates to protecting and enhancing freshwater quality and quantity. Mahinga kai is also a compulsory value in NPS-FM Appendix 1A.
Policy UD.2: Enable Māori cultural and traditional norms – consideration	FPP	Mana whenua / tangata whenua relationships to culture, land, water, sites, wāhi tapu and other taonga relates directly to protecting and enhancing freshwater quality and quantity.
Policy UD.3: Responsive Planning to developments that provide for significant development capacity - consideration	FPP	The qualities and characteristics of well-functioning urban environments, as articulated in Objective 22, include protecting and enhancing freshwater quality and quantity.
Chapter 4.3: Allocation of responsibilities		
Policy 61: Allocation of responsibilities for land use controls for indigenous biodiversity	FPP	Policy allocates responsibilities for indigenous biodiversity, which includes wetlands and beds of lakes and rivers.
Policy FW.6: Allocation of responsibilities for land use and development controls for freshwater	FPP	Policy is directly related to freshwater quality and quantity and giving effect to NPS-FM 3.5(4) by allocating freshwater responsibilities to territorial authorities to support freshwater improvements.
Chapter 4.4: Non-regulatory policies		
Policy 65: Supporting and encouraging efficient use and conservation of resources – non-regulatory	FPP	Clause (e) and (f) seek efficient water use, and the policy contributes to Objective 14 on efficient water allocation. It is therefore directly related to protecting and enhancing freshwater quantity.
Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	FPP	The qualities and characteristics of well-functioning urban environments, as articulated in Objective 22, include protecting and enhancing freshwater quality and quantity.
Policy CC.15: Improve rural resilience to climate change – non-regulatory	FPP	Many nature-based solutions directly protect, enhance or restore freshwater ecosystems, improve freshwater quality and benefit water flows and levels, particularly in the context of rural resilience. Clause (d) seeks to prioritise efforts that enhance freshwater and indigenous biodiversity.
Policy CC.16: Climate change adaptation strategies, plans and implementation programmes – non-regulatory	P1S1	Not directly related to freshwater quality or quantity.
Policy CC.17: Iwi climate change adaptation plans – non-regulatory	FPP	The matters that this policy seeks to manage impacts on, including mahinga kai, are directly related to freshwater quality and quantity. Mahinga kai is also a compulsory value in NPS-FM Appendix 1A.

Provision	Process	Justification
Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" – non-regulatory	FPP	Targeting areas where sediment water quality targets are not reached relates directly to protecting and enhancing freshwater quality.
Policy FW.7: Water attenuation and retention – non-regulatory	FPP	Directly related to protecting and enhancing freshwater quantity through both nature-based and built solutions.
Policy FW.8: Land use adaptation – non regulatory	FPP	Directly related to protecting and enhancing freshwater quantity through water resilience in land use practices and land use change.
Policy IE.3: Maintaining, enhancing, and restoring indigenous ecosystem health – non-regulatory	FPP	This policy represents an equivalent framework to the NPS-FM National Objectives Framework for indigenous ecosystems. Indigenous ecosystem health includes freshwater ecosystems health, which is intrinsically and directly linked to protecting and enhancing freshwater quality and quantity.
Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity – non-regulatory	FPP	Indigenous ecosystem protection, enhancement and restoration directly relates to the protection and enhancement of freshwater quality and quantity.
Chapter 4.5: Methods to implement policies (regulatory methods)		
Method 1: District plan implementation	FPP	Implementing policies directly relating to protecting and enhancing freshwater quality and quantity.
Method 2: Regional plan implementation	FPP	Implementing policies directly relating to protecting and enhancing freshwater quality and quantity.
Method 3: Wellington Regional Land Transport Plan Strategy implementation	P1S1	Not directly related to freshwater quality or quantity.
Method 4: Consideration – resource consents, notices of requirement and when changing, varying or reviewing plans	FPP	Implementing policies directly relating to protecting and enhancing freshwater quality and quantity.
Method 5: Allocation of responsibilities	FPP	Implementing policies directly relating to protecting and enhancing freshwater quality and quantity.
Method FW.1: Freshwater Action Plans	FPP	Freshwater action plans are a key aspect of giving effect to the NPS-FM to protect and enhance freshwater quality and quantity using both regulatory and non-regulatory actions.
Chapter 4.5: Methods to implement policies (non-regulatory methods)		
Method 14: Information on natural hazard and climate change	P1S1	Not directly related to freshwater quality or quantity.
Method 17: Reducing waste and greenhouse gases emissions from waste streams	P1S1	Not directly related to freshwater quality or quantity.
Method 21: Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values	FPP	Indigenous ecosystems and habitats protected by this method include freshwater ecosystems, which are intrinsically linked to protecting and enhancing freshwater quality and quantity.
Method 22: Integrated hazard risk management and climate change adaptation planning	P1S1	Not directly related to freshwater quality or quantity.

Provision	Process	Justification
Method 23: Information about natural features to protect property from natural hazards	P1S1	Not directly related to freshwater quality or quantity.
Method 25: Information about the provision of walking, cycling and public transport for development	P1S1	Not directly related to freshwater quality or quantity.
Method 30: Implement a harbour and catchment management strategy for Porirua Harbour	FPP	Managing sediment, nutrient and sediment discharges relates directly to protecting and enhancing freshwater quality and quantity.
Method 31: Protocol for management of earthworks and air quality between local authorities	P1S1	Not directly related to freshwater quality or quantity.
Method 32: Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values	FPP	Method protects values associated with freshwater quality and quantity and indigenous ecosystems, and contributes to achieving Objective 13. It therefore directly relates to enhancing and protecting freshwater quality and quantity.
Method 33: Identify sustainable energy programmes	P1S1	Not directly related to freshwater quality or quantity.
Method 34: Prepare a regional water supply strategy	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Method 35: Prepare a regional stormwater action plan	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Method 40: Sign the New Zealand Urban Design Protocol	P1S1	Not directly related to freshwater quality or quantity.
Method 41: Integrate public open space	P1S1	Not directly related to freshwater quality or quantity.
Method 42: Develop visions for the regionally significant centres	P1S1	Not directly related to freshwater quality or quantity.
Method 43: Develop principles for retail activities	P1S1	Not directly related to freshwater quality or quantity.
Method 44: Analysis of industrial employment locations	P1S1	Not directly related to freshwater quality or quantity.
Method 45: Develop principles for rural-residential use and development	P1S1	Not directly related to freshwater quality or quantity.
Method 46: Develop complex development opportunities	FPP	The definition of complex development opportunities includes creating well-functioning urban environments, a characteristic of which is protecting and enhancing freshwater quality and quantity.
Method 47: Analysis of the range and affordability of housing in the region	P1S1	Not directly related to freshwater quality or quantity.
Method 48: Water allocation policy review	FPP	Directly related to protecting and enhancing freshwater quantity and giving effect to the NPS-FM.
Method 53: Support mana whenua / tangata whenua and community restoration initiatives for indigenous ecosystems	FPP	Indigenous ecosystem restoration includes restoring freshwater ecosystems, which are intrinsically linked to protecting and enhancing freshwater quality and quantity. This method also contributes to achieving Objective 12.

Provision	Process	Justification
Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems	FPP	Indigenous ecosystems includes maintaining, enhancing and/or restoring freshwater ecosystems, which are intrinsically linked to protecting and enhancing freshwater quality and quantity.
Method 56: Assist the community to reduce waste and use water and energy efficiently	FPP	Clause (b) and (c) seek efficient water use, which relates to protecting and enhancing freshwater quantity.
Method IM.1: Integrated management - ki uta ki tai	FPP	Mana whenua / tangata whenua decision making and Mātauranga focus largely on freshwater matters, and are therefore directly related to matters that will impact freshwater quality or quantity.
Method IM.2: Protection and interpretation of Mātauranga Māori and Māori data	FPP	Method refers to freshwater Mātauranga and data, and is intrinsically linked to monitoring freshwater quality or quantity.
Method CC.1: Climate change education and behaviour change programme	P1S1	Not directly related to freshwater quality or quantity.
Method CC.2: Develop carbon emissions offsetting guidance	P1S1	Not directly related to freshwater quality or quantity.
Method CC.3: Travel demand management plans	P1S1	Not directly related to freshwater quality or quantity.
Method CC.4: Prepare a regional forest spatial plan	FPP	Addressing sediment water quality targets relates directly to protecting and enhancing freshwater quality.
Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	P1S1	Not directly related to freshwater quality or quantity.
Method CC.6: Identifying nature-based solutions for climate change	FPP	Nature-based solutions by definition must include co-benefits for indigenous biodiversity. Many nature-based solutions directly protect, enhance or restore freshwater ecosystems, improve freshwater quality and benefit water flows and levels. For example, requiring water-sensitive urban design in built environments will improve freshwater quality and attenuate flood flows.
Method CC.7: Advocating for the use of transport pricing tools	P1S1	Not directly related to freshwater quality or quantity.
Method CC.8: Programme to support low-emissions and climate-resilient agriculture	FPP	Clause (d) and (e) support on-farm nature-based solutions, which often directly protect, enhance or restore freshwater ecosystems, improve freshwater quality and benefit water flows and levels. This method also contributes to achieving Objective 12 and 14.
Method CC.9: Support and funding for protecting, enhancing, and restoring indigenous ecosystems and nature-based solutions	FPP	Ecosystems protected, enhanced or restored by this method include freshwater ecosystems, which are intrinsically linked to protecting and enhancing freshwater quality and quantity.
Method CC.10: Establish incentives to shift to active and public transport	P1S1	Not directly related to freshwater quality or quantity.

Provision	Process	Justification
Method FW.2: Joint processing urban development consents	FPP	Method is key to achieving freshwater objectives which are giving effect to the NPS-FM, and directly contributes to implementing freshwater policies under Table 4. It therefore directly relates to protecting and enhancing freshwater quality and quantity.
Method IE.1: Partnering with mana whenua / tangata whenua to give local effect to Te Rito o te Harakeke	FPP	Te Rito o te Harakeke includes freshwater ecosystems, which are intrinsically linked to protecting and enhancing freshwater quality and quantity.
Method IE.2: Inventory of biodiversity offsetting and biodiversity compensation opportunities	FPP	Ecosystems and habitats with significant indigenous biodiversity values include freshwater ecosystems, which are intrinsically linked to protecting and enhancing freshwater quality and quantity.
Method IE.3: Regional biodiversity strategy	FPP	Indigenous biodiversity includes freshwater biodiversity, which is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Method IE.4: Kaitiaki indigenous biodiversity monitoring programme	FPP	Freshwater ecosystem health and giving effect to Te Mana o Te Wai is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Method UD.1: Development manuals and design guides	FPP	Method implements Policy 67, Policy CC.14 and Policy FW.3, which are all directly related to protecting and enhancing freshwater quality and quantity. It also contributes to achieving Objective 12.
Method UD.2: Future Development Strategy	P1S1	Not directly related to freshwater quality or quantity.
Chapter 5: Monitoring the Regional Policy Statement and progress towards anticipated environmental results (AERs)		
Integrated Management AER	FPP	Corresponding objective directly relates to protecting and enhancing freshwater quality and quantity.
Climate change AER	P1S1	Not directly related to freshwater quality or quantity.
Freshwater Objective 12 AER 1	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 12 AER 2	FPP	Freshwater ecosystem health is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 12 AER 3	FPP	Freshwater ecosystem health is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 12 AER 4	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 12 AER 5	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 12 AER 6	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 12 AER 7	FPP	Freshwater ecosystem health is intrinsically linked to protecting and enhancing freshwater quality and quantity.

Provision	Process	Justification
Freshwater Objective 12 AER 8	FPP	Directly related to protecting and enhancing freshwater quantity.
Freshwater Objective 12 AER 9	FPP	Directly related to protecting and enhancing freshwater quality.
Freshwater Objective 12 AER 10	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 12 AER 11	FPP	Directly related to protecting and enhancing freshwater quality.
Freshwater Objective 13 AER 1	FPP	Macro-inverterbrate health is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 13 AER 2	FPP	Freshwater ecosystem health is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 13 AER 3	FPP	Freshwater ecosystem health is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 13 AER 4	FPP	Freshwater ecosystem health is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 13 AER 5	FPP	The freshwater values in Appendix 1 are directly related to freshwater quality and quantity.
Freshwater Objective 13 AER 6	FPP	Wetland extent is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 13 AER 7	FPP	Freshwater ecosystem health is intrinsically linked to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 13 AER 8	FPP	The freshwater values in Appendix 1 are directly related to freshwater quality and quantity.
Freshwater Objective 14 AER 1	FPP	Directly related to protecting and enhancing freshwater quality and quantity.
Freshwater Objective 14 AER 2	FPP	Directly related to protecting and enhancing freshwater quantity.
Freshwater Objective 14 AER 3	FPP	Directly related to protecting and enhancing freshwater quantity.
Freshwater Objective 14 AER 4	FPP	Directly related to protecting and enhancing freshwater quantity.
Indigenous Ecosystems AER 1	FPP	Indigenous ecosystem health includes freshwater ecosystem health, which is intrinsically and directly linked to protecting and enhancing freshwater quality and quantity.
Indigenous Ecosystems AER 1	FPP	Protecting indigenous ecosystems includes freshwater ecosystems, which is intrinsically and directly linked to protecting and enhancing freshwater quality and quantity.
Indigenous Ecosystems AER 1	FPP	Protecting indigenous ecosystems includes freshwater ecosystems, which is intrinsically and directly linked to protecting and enhancing freshwater quality and quantity.

Provision	Process	Justification
Indigenous Ecosystems AER 1	FPP	Protecting indigenous ecosystems includes freshwater ecosystems, which is intrinsically and directly linked to protecting and enhancing freshwater quality and quantity.
Natural hazards AERs	P1S1	Not directly related to freshwater quality or quantity.
Regional form, design and function AERs	P1S1	Not directly related to freshwater quality or quantity.
Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	FPP	Freshwater ecosystems and species included in Appendix 1A are intrinsically linked to freshwater quality and quantity.
Table 17: Ecosystems and species that either meet or exceed the limits to the use of biodiversity offsetting and biodiversity compensation in the Wellington Region	FPP	Freshwater ecosystems and species included in Table 17 are intrinsically linked to freshwater quality and quantity.
Definitions		
Biodiversity compensation	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Biodiversity offsetting	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Complex development opportunities	FPP	The qualities and characteristics of well-functioning urban environments, as articulated in Objective 22, include protecting and enhancing freshwater quality and quantity.
Carbon emissions assessment	P1S1	Definition used only in non-freshwater provisions.
City centre zone	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Climate change adaptation	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Climate change mitigation	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Domestic fires	P1S1	Definition used only in non-freshwater provisions.
Ecological connectivity	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Ecological integrity	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Ecosystem health	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Emissions	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.

Provision	Process	Justification
Enhancement (in relation to indigenous biodiversity)	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Future Development Strategy	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Greenhouse gases	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Hazard sensitive activity	P1S1	Definition used only in non-freshwater provisions.
High density development	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Highly erodible land	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Hydrological controls	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Key centres	P1S1	Definition being removed.
Large scale generators	P1S1	Definition used only in non-freshwater provisions.
Maintain /maintained /maintenance: (in relation to indigenous biodiversity)	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Marae	P1S1	Definition being removed.
Medium density development	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Metropolitan centre zone	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
National grid	FPP	Definition used in the definition for Regionally Significant Infrastructure, which is used in freshwater provisions. It must also go through FPP for the provisions to have the correct meaning.
Naturally uncommon ecosystems	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Nature-based solutions	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Organic waste	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Papakāinga	P1S1	Definition being removed.
Permanent forest	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.

Provision	Process	Justification
Plantation forestry	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Protect (in relation to indigenous biodiversity)	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Regional form	P1S1	Definition being removed.
Regionally significant centres	P1S1	Definition used only in non-freshwater provisions.
Regionally significant infrastructure	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Relevant Residential Zone	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Resilience (in relation to a natural ecosystem)	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Restoration	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Rural areas	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Small scale (in relation to electricity generation)	P1S1	Definition used only in non-freshwater provisions.
Strategic Transport network	FPP	Definition used in the definition for Regionally Significant Infrastructure, which is used in freshwater provisions. It must also go through FPP for the provisions to have the correct meaning.
Te Mana o Te Wai	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Te Rito o te Harakeke	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Threatened ecosystems or species	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Tier 1 territorial authority	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Tree canopy cover	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.
Travel demand management plan	P1S1	Definition used only in non-freshwater provisions.
Urban areas	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.

Provision	Process	Justification
Urban environment	FPP	Definition used in freshwater provisions, so it must also go through FPP for the provisions to have the correct meaning.