

22 December 2022

File Ref: OIAP-7-26760

Tēnā koe [REDACTED]

### **Request for information 2022-229**

I refer to your request for information dated 29 November 2022, which was received by Greater Wellington Regional Council (Greater Wellington) on 29 November 2022. You have requested the following:

*“MDC have published a draft district plan that includes 2 future urban zones (Cashmere Oaks and Chamberlain Rd, FUZ’s) that appear to be soil type LUC 2 or 3, which is generally not to be subdivided when it is zoned rural, as it is now. Submission on the draft are due by 6th Dec, possibly later as the local residents association has been granted a time extension.*

*GW recently submitted on Cashmere plan change in opposition due to it being rural zoned LUC 3 land, since the plan change the draft plan was published with the Cashmere land as a FUZ.*

*My questions are:*

- 1) Will GW be making a submission in the draft plan? (even though this stage of consultation is “informal”). If yes can I have a copy asap? (LGOIMA)*
- 2) Will the new plan in respect of rural land being designated a FUZ be subject to the NPS-HPL? Or does the publication of the draft plan in October, or any other prior plan/document mean the NPS-HPL does not apply?*
- 3) When will the Regional Policy Statement be available? (if not already).*
- 4) Where can I obtain details of the LUC mapping (applicable to the district plan) for the Masterton district? (MDC told me a while back GW was still working on it).”*

**Greater Wellington's response follows:**

*1) Will GW be making a submission in the draft plan? (even though this stage of consultation is "informal"). If yes, can I have a copy asap? (LGOIMA)*

**Attachment 1** contains the feedback Greater Wellington have provided on the draft Wairarapa Combined District Plan as requested. The feedback addresses the Future Urban Zone locations and extent in both the letter and attached table. It does not specifically address the site your request refers to.

*2) Will the new plan in respect of rural land being designated a FUZ be subject to the NPS-HPL? Or does the publication of the draft plan in October, or any other prior plan/document mean the NPS-HPL does not apply?*

The draft Wairarapa Combined District Plan being released for consultation does not, as we understand, change anything regarding the effect of the NPS-HPL.

Clause 3.5(7) relates to interim requirements for application of the NPS-HPL until maps of highly productive land are operative in a regional policy statement. The interim requirements apply to areas that, on 17 October, had not either been identified for future urban development (through a Future Development Strategy or a strategic planning document) or been subject to a notified plan change that was initiated or adopted by Council. It is also our understanding that, because the draft Wairarapa Combined District Plan has not been notified and is not a 'strategic planning document', it does not change anything regarding the exclusions in Clause 3.5(7).

Any land that is currently general rural or rural production in the operative plan, is LUC class 1, 2, or 3, and has not been identified in a strategic planning document, is therefore subject to the NPS-HPL. Regarding the private plan change mentioned in your request, as stated in our submission on this plan change, it is our view that the direction in the NPS-HPL applies.

*3) When will the Regional Policy Statement be available? (if not already).*

The Regional Policy Statement has been operative since 2013 and can be found here:

<https://www.gw.govt.nz/assets/Documents/2022/03/RPS-Full-Documentedited.pdf>

Proposed Change 1 to the Regional Policy Statement was notified on 19 August 2022 and submissions closed on 14 October 2022. The proposed change can be found here:

<https://www.gw.govt.nz/your-region/plans-policies-and-bylaws/updating-our-regional-policy-statement-and-natural-resources-plan/regional-policy-statement-2022-changes/>

4) Where can I obtain details of the LUC mapping (applicable to the district plan) for the Masterton district? (MDC told me a while back GW was still working on it).

LUC mapping can be found on the Manaaki Whenua website here:

[https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/lri\\_luc\\_hpl](https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/lri_luc_hpl)

Greater Wellington is required to map (in collaboration with territorial authorities and tangata whenua) highly productive land in the region by November 2025 under clause 3.4 of the NPS-HPL. Highly productive land is defined in clause 3.4 as:

- (a) is in a general rural zone or rural production zone; and
- (b) is predominantly LUC 1, 2, or 3 land; and
- (c) forms a large and geographically cohesive area.

The mapping also needs to exclude land already identified for urban development as at 17 October 2022, and can include some areas considered to have potential for being highly productive that aren't LUC 1, 2 or 3 class land.

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Local Government Official Information and Meetings Act 1987.

Please note that it is our policy to proactively release our responses to official information requests where possible. Our response to your request will be published shortly on Greater Wellington's website with your personal information removed.

Nāku iti noa, nā



Alistair Cross  
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By email

6 December 2022

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Tēnā koutou,

1. Greater Wellington Regional Council comments on Wairarapa Combined Draft District Plan
2. Thank you for the opportunity to comment on the Wairarapa Combined Draft District Plan (**draft Plan**).
3. Greater Wellington Regional Council (**Greater Wellington**) broadly supports the strategic direction of the draft Plan, and the work undertaken through the review. We congratulate the Joint Committee and the three Councils for getting to this stage. In particular, we strongly support the direction to take a risk-based approach to natural hazards, enable marae and papakāinga, require rainwater tanks for new dwellings and address the impact of rural lifestyle development on primary production. We also support new direction controlling quarrying activities as this will complement consenting under the regional plan.
4. Proposed RPS Change 1 was notified in August 2022 and provides new direction to district plans across several areas. The change addresses four significant and urgent resource management issues for the region:
  - the impacts of climate change
  - loss and degradation of indigenous biodiversity
  - degradation of freshwater
  - lack of urban development capacity.
5. Greater Wellington notes that there remains work to be done ahead of notification of the Combined District Plan, including developing Design Guides and rolling over designations. We support the continued partnership with Rangitāne o Wairarapa and Ngāti Kahungunu ki Wairarapa to update the schedule of Sites and Areas of Significance to Māori. Leading up to notification we look forward to collaboratively working with you to:
  - a. Identify opportunities to align the District Plan with Proposed RPS Change 1
  - b. Roll over Greater Wellington designations
  - c. Provide input on the draft Engineering Development Standard with Wellington Water to seek regional consistency in water standards.
6. Greater Wellington seeks amendment or stronger provisions on several matters. Given the stage

of the plan review process, we have undertaken a high-level review and have not identified all opportunities for giving effect to the operative RPS or aligning with Proposed RPS Change 1. Our key areas of interest in the draft Plan at this stage include:

- a. Providing for urban growth through emphasis on infill development
  - b. Taking a risk-based approach to natural hazards and accounting for climate change
  - c. Protecting freshwater and drinking water supplies
  - d. Protecting indigenous biodiversity and natural character
  - e. Public transport accessibility and providing for multi-modal transport networks.
7. More detailed comments and additional points on draft Plan provisions can be found in Attachment 1 which should be read alongside this letter.
  8. Flood hazard maps are not included in the draft Plan. Greater Wellington is completing mapping to the standards set out in the flood hazard modelling standard and will provide flood hazard maps for the Greater Wellington flood scheme rivers once they are finalised in March 2023.
  9. Greater Wellington's feedback on the draft Plan does not comment on zone locations with respect to flood hazard. We expect the completed maps to inform appropriate zoning ahead of notification, and we will comment on flood hazards when the Wairarapa Combined District Plan is notified in 2023.
  10. It should be noted that Greater Wellington will not provide stormwater or pluvial flood hazard mapping. This is a territorial authority responsibility, and we would expect stormwater flood hazards to be mapped and considered in the Wairarapa Combined District Plan. For example, we note that the recent flooding in Masterton on Wednesday 16 November 2022 was the result of localised stormwater flooding.

#### Providing for urban growth through emphasis on infill development

11. Greater Wellington recognises that some important steps toward enabling urban intensification have been taken by providing for accessory dwellings and minor residential units, removing low-density residential zones, reducing minimum lot sizes, controlling fragmentation of rural land and providing for Medium Density Residential Precinct in central Masterton. We also support the strategic objectives on Urban Form and Development and the emphasis on infrastructure capacity, efficient urban growth and town centre vibrancy. However, the District Plan largely continues to provide for the existing housing typology of detached dwellings and does not clearly signal a shift toward greater infill development and housing variety.
12. Greater Wellington considers that the Wairarapa Combined District Plan should go further to enable growth within the existing urban footprints, to achieve the Urban Form and Development strategic objectives. The extent of the draft Future Urban Zones and new urban or rural lifestyle zoning could then be re-considered in light of greater intensification. Where greenfield development is proposed, well-planned and integrated land use planning should seek to achieve higher densities and a range of housing typologies in the most appropriate places. Amendments sought include greater application of the Medium Density Residential Precinct in Carterton and Featherston, with necessary infrastructure being provided.

13. Reasons for Greater Wellington seeking greater emphasis on infill development and higher density greenfield development include:

- a. All Future Urban Zones and the proposed rural lifestyle zone identified in the Draft Plan are partially or entirely on Land Use Capability classes 1, 2 or 3 rural land.
- b. The operative Regional Policy Statement (RPS) Objective 22 has clear direction toward a compact regional form with urban development in existing urban areas, a range of housing, town centre vibrancy, integrated land use and transportation, and efficient use of existing infrastructure.
- c. Proposed RPS Change 1 seeks for land use and urban development to contribute toward reductions in transport-related greenhouse gas emissions for climate change mitigation, support a transition to a climate-resilient region and prioritise the protection and enhancement of freshwater. A combination of infill development and higher density, well-planned greenfield development would contribute to the objectives signalled by both operative and proposed RPS direction more effectively than the currently predominant form of urban growth.
- d. Growth within the existing urban footprint is most efficient from an infrastructure perspective; infrastructure capacity (including transport infrastructure) being a key ongoing issue associated with providing for growth in the Wairarapa.
- e. The National Policy Statement for Urban Development 2020 signals the benefits of intensification, and clause 1.5 strongly encourages tier 3 local authorities to implement the intensification direction that tier 1 and 2 authorities must do.
- f. The Carterton Housing Action Plan and draft Featherston Masterplan both identify a need for a range of housing and section sizes.

#### **Taking a risk-based approach to natural hazards and accounting for climate change**

14. Greater Wellington broadly supports the direction taken on natural hazards through the natural hazards, subdivision and coastal environment chapters. We support the use of a risk-based approach as this aligns with RPS natural hazard policies, and the use of a Foreshore Protection Area at this stage. We seek a more nuanced approach to the management of fault rupture and liquefaction risks, as well as acknowledgement of the risks presented by slope failure hazards and their exacerbation by increasingly intense rainfall events driven by climate change.

15. Our specific comments also address opportunities to align with Proposed RPS Change 1; including consideration of the potential impacts of climate change and hard engineering hazard mitigation measures. We also seek to ensure that Greater Wellington's operational flood protection requirements are adequately provided for by the hazard provisions.

#### **Protecting freshwater and drinking water supplies**

16. Greater Wellington recognises and strongly supports the steps taken toward supporting water resilience, reducing water demand and considering impacts on water bodies; particularly the requirement of rainwater tanks for non-potable water use. We note that this aligns with Recommendation 98 of the Ruamāhanga Whaitua Implementation Programme.

17. However, the draft Plan does not currently go far enough to protect freshwater and give effect to the National Policy Statement for Freshwater Management 2020 (NPS-FM) through territorial

authority RMA section 31 functions. There is also no recognition of Te Mana o Te Wai across the Plan. Te Mana o te Wai is a fundamental shift in approach which should be embedded in the District Plan and drive an integrated management approach to freshwater in accordance with the principle of ki uta ki tai. The District Plan and associated Engineering Development Standards should explicitly promote positive effects of urban development on the health and well-being of water bodies and freshwater ecosystems, as outlined by RPS Objective 12, NPS-FM clause 3.5(4), and Proposed RPS Change 1 Policy FW.3.

18. The proposed minimum lot size in the rural lifestyle zone does not adequately provide for potential effects of rural lifestyle development on freshwater quality, particularly from the density of on-site wastewater systems. The identified Masterton rural lifestyle area is located partially in the Waipoua catchment which is a priority catchment for nutrient management under Schedule Y of the regional plan. Opportunities for collective wastewater systems of all native lot sizes should be considered.
19. More broadly, Greater Wellington seeks for the references to septic tanks or soakage fields to be updated to refer to on-site wastewater systems, and for investigation into de-centralised wastewater re-use and treatment, using approved alternative wastewater systems, to be supported in areas with both reticulated and un-reticulated wastewater networks.
20. Greater Wellington also seeks that all Community Drinking Water Supply Protection Areas in Schedule M of the regional plan are included in the District Plan as layers for information when considering the location of urban development.

#### **Protecting indigenous biodiversity and natural character**

1. Greater Wellington seeks for the indigenous biodiversity provisions to be strengthened to ensure the effects management hierarchy is fully provided for and the relevant operative RPS provisions are given effect to. We are also interested to further understand the intent behind the Recommended Areas for Protection in Schedule 6 and the process for determining that they do not meet the criteria for Significant Natural Areas. We also suggest some amendments to the pest plant list to be more applicable in the Wairarapa.
2. Greater Wellington supports the work undertaken to identify and schedule sites of high, very high and outstanding natural character. However, we seek that the wider area scale natural character ratings (from the 2020 Wairarapa Natural Character assessment) are also included in the District Plan to support the management of natural character. Adverse effects on natural character cannot be managed effectively at a site in isolation and should be considered in the broader context of the coastal environment. We also seek that the values which comprise natural character ratings and outstanding natural features and landscapes values are included in the relevant schedules to ensure potential effects on them can be managed appropriately through resource consent processes.

#### **Public transport accessibility and providing for multi-modal transport networks**

21. Greater Wellington supports the direction toward providing for a multi-modal transport network through subdivision and urban development, however, consider that the provisions could go further by creating an explicit link to seeking a reduction in transport-related greenhouse gas emissions. Our specific amendments seek for the direction toward multi-modal networks to be strengthened as well as greater emphasis on integration between urban development and



infrastructure planning, including public transport accessibility and infrastructure through the subdivision, transport, residential zone and town centre zone chapters.

22. We also note that requiring minimum carparking provision for activities in South Wairarapa and Carterton creates an inconsistent approach between districts under the same District Plan and would make South Wairarapa and Carterton the regional exception. We encourage implementation of the NPS-UD direction to remove carparking requirements across the whole of Wairarapa for greater consistency.

23. We look forward to continued engagement on the District Plan review. We are happy to discuss the matters raised should you seek any clarifications.

Nāku nā,



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## Appendix 1: Greater Wellington Detailed Comments on Provisions

Provision or Section	Comment/Reasons	Amendments Sought
<b>General Comments</b>		
Terminology	There is some inconsistency in use of terms throughout the draft Plan, particularly with transport and biodiversity terminology.	<p>Please ensure consistent use of terminology throughout the District Plan clarity and interpretation.</p> <p>We suggest use the term 'biodiversity' consistently instead of 'biological diversity' and consistently referring to significant natural areas.</p> <p>Consistently refer to either the 'road transport network' or the 'transport network' throughout the plan. Road Transport Network is a defined term however the draft Plan most commonly refers to the Transport Network.</p>
Statutory obligations	We note that the Rangitāne deed of settlement has been incorporated into this plan. However, the draft Plan does not yet reflect the statutory obligations arising out of the deed of settlement signed by Ngāti Kahungunu ki Wairarapa Tāmaki-nui-a-rua. Two bills currently in front of the house, Te Rohe o Rongokako Joint Settlement Bill and Ngāti Kahungunu ki Wairarapa Tamaki-nui-a-rua Settlement Bill, will each have implications to reflect in the District Plan.	Ensure that the statutory obligations arising out of the Te Rohe o Rongokako Joint Settlement Bill and Ngāti Kahungunu ki Wairarapa Tamaki-nui-a-rua Settlement Bill are reflected in the District Plan where relevant.
Approach to providing for urban growth	<p>As outlined in our submission letter, we support the efforts taken to provide for intensification. In particular we support the provisions which explicitly provide for multi-unit housing and providing for mixed use and town centre zones with lower boundary setbacks and no minimum lot sizes. We also support the reduction in minimum lot size.</p> <p>However, the extent of Future Urban Zones signalled by the draft Plan and current zone provisions do not clearly enough signal a direction toward intensification and infill development. Detached dwellings remain the bulk of</p>	<p>For the reasons outlined in the submission letter, Greater Wellington seeks for the District Plan to place greater emphasis on development within the existing urban area. The extent of the Future Urban Zones could be re-considered in light of greater intensification being enabled.</p> <p>Suggested areas where intensification and infill development could be enabled to a greater extent in the District Plan include (but are not limited to):</p>

Provision or Section	Comment/Reasons	Amendments Sought
	<p>the urban growth provided for, which does not sufficiently respond to the identified need for housing variety and smaller homes in the region. For example, GRZ-P4 as it is currently wording does not signal a shift toward intensification:</p> <p>‘1. intensity of development that is <b>predominantly single detached or semi-detached residential units on single sites</b>, with suburban lot sizes, and providing for high quality and <b>spacious</b> on-site amenity;</p> <p>2. building height, bulk, and form that achieves the planned built character of predominantly 1- to 2-storey residential units within a generally <b>spacious setting</b>;</p>	<ul style="list-style-type: none"> <li>• Smaller minimum lot sizes in residential zones</li> <li>• Future Urban Zones chapter to signal higher densities during structure planning</li> <li>• Strategic direction and relevant chapter objectives to emphasise compact urban form</li> <li>• Multi-unit housing to be more clearly enabled. The current activity statuses of Restricted Discretionary in the Medium Density Precinct and Discretionary in the general rural zone could be reduced to provide a clear consenting pathway</li> <li>• Reduced boundary setbacks in general residential zone particularly front setbacks (GRZ-S3)</li> <li>• Reconsider the prominence of character and amenity values in the General Residential Zone, as well as emphasis on detached dwellings.</li> </ul>
<p>General comment on provision for soil conservation and river control works</p>	<p>The Operative Plan contains a permitted activity rule (Ref 21.1.21) that provides for soil conservation, flood protection, river control works and riparian protection schemes when these are carried out or supervised by Greater Wellington. Greater Wellington requests that this rule, or a rule with similar wording, is carried over into the new Plan. This rule appropriately provides for river management activities including the stockpiling of material outside of the river corridor as required to undertake these activities.</p>	<p>Include a rule in the Draft plan similar to Rule 21.1.21 in the Operative Plan, that provides for soil conservation and river control works undertaken by Greater Wellington.</p>
<p>Subdivision chapter, zones chapters and freshwater – general comment</p>	<p>We support the infrastructure provision provided for in the subdivision and zones chapters, as well as references to the Engineering Standards which provide for consideration of stormwater quality and low impact design. However, in our view the provisions do not currently go far enough to protect freshwater and give effect to the NPS-FM, including Te Mana o Te Wai.</p> <p>The subdivision chapter and zones chapters do not currently include outcomes or, or actions to achieve, water quality or aquatic ecosystem health.</p>	<p>Include objectives, policies, and rules to give effect to RPS Objective 12, NPS-FM section 3.5(4) and have regard to Proposed RPS Change 1 Policy FW.3.</p> <p>These provisions need to be explicit about how the District Plan can promote positive effects of urban development on the health and well-being of water bodies and freshwater ecosystems. This is a core function of TAs under the NPS-FM and RMA Section 31 functions (i.e., in relation to managing effects of</p>

Provision or Section	Comment/Reasons	Amendments Sought
	<p>Clause 3.5(4) of the NPS-FM requires territorial authorities 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 and freshwater ecosystems.</p>	<p>development of land).</p> <p>Te Mana o te Wai is a fundamental shift in approach which should be embedded in the District Plan and drive an integrated management approach to freshwater in accordance with the principle of ki uta ki tai. This means thinking both about where urban development occurs and how it occurs.</p> <p>Connections should be made between all freshwater-related chapters to ensure an integrated approach as required by the NPS-FM, and freshwater direction should be woven throughout the District Plan from policy direction through to rules and assessment matters.</p>
<p>Subdivision chapter, zones chapters and nature-based solutions – general comment</p>	<p>Proposed RPS Change 1 includes a number of provisions that recognise nature-based solutions are an integral part of the climate change mitigation and adaptation response required in the region and also provide a number of other benefits for indigenous biodiversity and community well-being. Nature-based solutions are defined as ‘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...’.</p> <p>Natural nature-based solutions already exist and perform functions that support solutions to climate change. These areas are to be mapped by Greater Wellington. District Plans should avoid adverse effects on ecosystems providing nature-based solutions to have regard to Policy CC.12 in Proposed RPS Change 1. They should also provide for these solutions to be part of infrastructure and development planning and design in order to manage issues such as water quality and natural hazard protection and increase resilience against climate change, to have regard to Policy CC.7.</p>	<p>Add provisions that seek and permit nature-based solutions when providing for new infrastructure and in new developments, such as the use of green infrastructure. Policy direction and rules should set out a clear preference for implementing nature-based solutions in all infrastructure planning and land use development.</p> <p>Add provisions that direct the protection of areas that already perform a function as a nature-based solution, including the many wider benefits these can have, and encourage the restoration of nature-based solutions. For example, a matter of control or discretion for subdivision could include the extent to which the design protects, enhances, restores or creates nature-based solutions to manage the effects of climate change, or similar.</p>

Provision or Section	Comment/Reasons	Amendments Sought
Subdivision chapter, zones chapters and climate resilience – general comment	<p>We recognise that drafted provisions, including requiring rainwater tanks and enabling renewable electricity generation, have taken key step to contribute to climate resilience.</p> <p>Given the future challenges posed by climate change, it is essential that urban development and intensification focuses on ensuring urban areas are resilient to the negative effects of climate change, such as lower rainfall, warmer urban areas, and more severe storm and hazard events. Greater Wellington seeks for the District Plan to have regard to Proposed RPS Change 1 Policies 11, CC.4 and CC.14.</p>	Add provisions that require new development areas to include actions and initiatives that contribute to improvements in the climate resilience of urban areas, for example through measures identified in Policy CC.14 of Proposed RPS Change 1.
Subdivision chapter, zones chapters, Engineering Standards and water sensitive urban design – general comment	Proposed RPS Change 1 has new direction on protecting freshwater from urban development, as a part of giving effect to the NPS-FM Clause 3.5(7) Policy FW.3 includes direction on water sensitive urban design, stormwater quality, runoff quantity and freshwater bodies.	Include direction in the Subdivision and zones chapters requiring the application of Water Sensitive Urban Design principles and methods during consideration of subdivision, the extent of impervious surfaces and in the control of stormwater infrastructure. Proposed RPS Change 1 also directs requiring hydrological controls to manage runoff quantity, locating and designing urban development to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries, enabling mana whenua / tangata whenua to be actively involved in freshwater decision making, and adopting an integrated approach, which should be incorporated in the District Plan.
Well-functioning urban environments across relevant zones (GRZ, TCZ, NCZ, MUZ) – general comment	Greater Wellington seeks for the provisions of all relevant zones to contribute to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1. This includes (but is not limited to) urban areas that are climate resilient, contribute to the protection of the natural environment and transition to a low emission region, are compact and well connected, support housing affordability and choice, and enable Māori to express their cultural and traditional norms.	Ensure all Zone provisions have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics.

Provision or Section	Comment/Reasons	Amendments Sought
<b>Part 1 – Introduction and General Provisions</b>		
Tangata Whenua chapter	We broadly support this chapter.	Retain.
Tangata whenua chapter – Council obligations paragraph	We are not sure about the wording of this paragraph.	We would welcome a reference to the Rangitāne o Wairarapa Tama i Nui a Rua Deed of Settlement and a discussion about the interpretation of that provision ahead of notification.
Hazard areas definition	It is important to identify hazard areas in the district plan, and to use a hierarchy to assign the areas into high hazard, moderate hazard or low hazard areas. This definition should refer to Table NH-1 in the Natural Hazards chapter, as this table clarifies what is meant by high hazard areas, moderate hazard areas and low hazard areas.	Amend to include reference to table NH-1 O Add definitions for high hazard areas, moderate hazard areas and low hazard areas to the definitions section.
Hazard sensitive activities definition	Service stations should be included in the list of hazard sensitive activities. As proposed, they are captured under commercial activities, defined as potentially hazard sensitive. Smaller service stations could potentially store less volume than the limits specified in the significant hazardous facility definition. A fault rupture through a petrol storage tank could have extremely severe consequences and should be considered hazard sensitive.	Add as follows: Hazard sensitive activities comprise the following: ...  <u>Service stations</u>
Natural Hazard definition	The definition provided in the draft Plan is appropriate as it refers to the definition in the RMA.	Retain as drafted
Less hazard sensitive activities definition	The list of land use activities contained in this definition is considered acceptable and appropriate.	Greater Wellington requests that this term is amended to state 'Low' instead of 'Less', or similar, and the required changes made throughout the Plan.
Potentially Hazard Sensitive Activities definition	The list of land use activities contained in this definition is considered acceptable and appropriate.	Greater Wellington requests that this term is amended to state 'Moderate' instead of 'Potentially', or similar, and the required changes made throughout the Plan.
Biodiversity Offset	The current definition is wordy and likely to result in misinterpretation. We suggest the provided amendment to align the definition in the draft Plan with that of the regional plan and the National Policy Statement for Indigenous	Amend definition as follows: "Means a measurable <del>conservation</del> <u>positive environmental</u> outcomes resulting from actions <del>which are</del> designed to address

Provision or Section	Comment/Reasons	Amendments Sought
	<p>Biodiversity (NPS-IB) exposure draft.</p> <p>We also suggest that the principles for offsetting are removed from the definition and inserted, with much more detail, into a new Appendix (suggestion provided later in table).</p>	<p>redress <u>the</u> residual diverse effects on biodiversity impacts arising from <del>project development</del> activities after appropriate avoidance, minimisation, and remediation measures have been <del>taken</del> applied. <u>The goal of a biodiversity offset is to achieve no net loss, and preferably a net gain, of indigenous biodiversity values.</u> Biodiversity offsets must address the following principles: <del>1. No net loss – The offsetting proposal achieves no net loss and preferably a net gain of biodiversity. 2. Additional conservation outcomes – Biodiversity outcomes are above and beyond results that would have occurred if the offset was not proposed. 3. Limits to offsetting – Biodiversity offsetting should not be applied to justify impacts on vulnerable and irreplaceable biodiversity. 4. Proximity – The offsetting proposal should be located close to the application site, where this will achieve the best ecological outcomes. 5. Like for like – Offsetting measures re-establish or protect the same or similar type of ecosystem to that which is adversely affected.</del></p>
Environmental compensation	<p>We suggest replacing the term ‘environmental compensation’ and associated definition with ‘biodiversity compensation’, an associated definition, to improve clarity and alignment with regional and national policy direction.</p> <p>Our suggested definition slightly modifies the regional plan biodiversity offsetting definition by replacing the requirement for no net loss (which is not possible with compensation) with a requirement for an outcome that is disproportionately positive relative to the values lost. This acknowledges the inherent risks associated with compensation given that it represents the least desirable outcome for biodiversity.</p>	<p>Amend definition as follows:</p> <p><del>Environmental compensation: “Means any action (works, services, protection, restoration, enhancement, or restrictive covenants) as compensation for unavoided, remedied, and unmitigated adverse effects of the activity for which consent is being sought, including actions that provide measurable biodiversity outcomes that address residual adverse biodiversity effects arising from project development and which do not meet the thresholds of a biodiversity offset”.</del></p> <p><u>Biodiversity Compensation: “Means a measurable positive environmental outcome resulting from actions designed to redress the residual adverse effects on biodiversity arising from activities after appropriate avoidance, minimisation,</u></p>

Provision or Section	Comment/Reasons	Amendments Sought
		<u>remediation and biodiversity offsetting measures have been applied. The goal of biodiversity compensation is to achieve an outcome for indigenous biodiversity values that is disproportionately positive relative to the values lost</u> ".
<b>Strategic Direction</b>		
CCR-O1 – CCRO4	<p>We support these objectives and think it is appropriate to provide for planning for adaptation and mitigation measures as well as water resilience. We particularly support the wording that the risk and consequence of natural hazards, including flood hazards “are not increased”.</p> <p>However, we consider that there could be greater recognition of the role of the District Plan in contributing to climate change mitigation, particularly through land use planning.</p> <p>We also consider that there should be recognition of the contribution that healthy native ecosystems and processes and their contribution to both climate change mitigation and adaptation.</p>	<p>Include reference to climate change mitigation as well as adaptation and resilience, and the contribution indigenous ecosystems and natural processes make as nature-based solutions to climate change resilience, adaptation and mitigation.</p> <p>See the WCC Proposed District Plan SRRC-O1, SRRC-O3 and SRRC-O4 as an example.</p>
HC-O1 – HC-O2	We support these objectives.	Retain.
NE-O1 – NE-O5	We support these objectives and the recognition of integrated management however consider that there should be recognition of freshwater and the relationship mana whenua / tangata whenua have with freshwater.	Include new strategic objective on Te Mana o Te Wai and development and subdivision contributing to enhancement of the health and wellbeing of freshwater bodies.
RE-O2 and RE-O4	Support these policies and suggest aligning with wording from the National Policy Statement for Highly Productive Land (NPS-HPL).	Align with wording and direction from the NPS-HPL.
TW-O1 – TW-O4	We support these objectives.	Retain.



Provision or Section	Comment/Reasons	Amendments Sought
UFD-O1 – UFD-O6	<p>We support these objectives, however query whether they can be achieved without a strong emphasis on urban growth within existing urban areas as opposed to greenfield development.</p> <p>We suggest signaling a direction toward infill development and enabling intensification (in the right places) as well as housing variety; a key issue identified in the Wairarapa. We also encourage consideration of the range of qualities and characteristics of well-functioning urban environments that are articulated in Objective 22 of Proposed RPS Change 1.</p> <p>Some of this direction is already signaled by objectives such as SUB-O1</p>	<p>Insert a new strategic objective similar to the below: Growth within the existing urban areas of the Wairarapa towns is prioritised, and greater densities of development are enabled in areas with sufficient infrastructure capacity and located close to centres, services, open spaces and/or public transport.</p> <p>Amend UFD-O2 similar to the below: The Wairarapa's urban areas grow in a planned, efficient, and structured way to meet future needs in a responsive manner <u>and provide for a variety of housing types that respond to a range community needs.</u></p>
<b>Part 2 – District Wide Matters</b>		
Energy chapter	We support the direction in this chapter to enable renewable electricity generation, particularly ENG-O3 shifting toward a low emission economy. This direction aligns with Proposed RPS Change 1.	Retain.
Transport chapter – general comments	<p>Numerous provisions in this chapter could go further to connect reducing dependence on private motor vehicles and reductions in transport-related greenhouse gas emissions, to have better regard to Proposed RPS Change 1 and a clearer connection to the CCR strategic objectives.</p> <p>We consider direction to integrate transport planning for a multi-modal transport network with urban development should be clearer throughout the chapter to support similar direction in the subdivision chapter.</p>	<p>Link the transport provisions to reductions in transport-related greenhouse gas emissions and integration with urban development.</p> <p>Please emphasise connected active transport options being safe and accessible.</p>

Provision or Section	Comment/Reasons	Amendments Sought
TR-O1	<p>We support the intent of this policy, however, we seek for the direction to 'support' transport mode options to be strengthened.</p> <p>We also consider the need for the public transport network to be accessible should be emphasized.</p>	<p>Amend e. to: Supports transport mode options to increase the use <b>and accessibility</b> public transport, walking, and cycling and reduces dependency on private motor vehicles where that is, or can be made, safe.</p>
TR-P1	<p>We support this policy, however, we seek for the direction to 'support' transport mode options to be strengthened.</p>	<p>Amend o something like: Require land use, subdivision, and development to <b>provide for support</b> a multi-modal transport system, addressing the needs of all users, including pedestrians, cyclists, public transport, freight vehicles, and private passenger vehicles.</p>
TR-P2	<p>We support this policy, particularly clause d. We consider there could be greater emphasis on integrating urban development with a multi-modal transport network, and for walking and cycling connections to be safe and accessible.</p> <p>Suggest including the Waka Kotahi Draft Guidelines for public transport in here as something else to follow: <a href="https://www.nzta.govt.nz/walking-cycling-and-public-transport/public-transport/public-transport-design-guidance/">https://www.nzta.govt.nz/walking-cycling-and-public-transport/public-transport/public-transport-design-guidance/</a></p>	<p>Amend e. to: Considers and responds to safety and accessibility, including Crime Prevention Through Environmental Design (CPTED) principles <b>and the Waka Kotahi Public Transport Design Guidance</b>.</p> <p>Strengthen emphasis on integration with urban development, and provide link to climate change mitigation. Amend to specify walking and cycling connections to be safe and accessible as directed in TR-O1.</p>
TR-P4	<p>Need to include public transport specifically, including infrastructure requirements such as bus stops and bus manoeuvrability.</p>	<p>Amend to: Establish rules and standards on land use, subdivision, and development to avoid, remedy, or mitigate any effects on the safe and efficient functioning and operation of the transport network, including loading, parking, manoeuvring and vehicle, <b>public transport access and infrastructure</b>, pedestrian, and cycle access.</p>
TR-P10	<p>Greater Wellington supports this policy.</p>	<p>Retain</p>
TR-R3 and Appendix TR-1	<p>Travel and management plans, directed by Proposed RPS Change 1 Policy CC 2, could be included in this rule. The assessment of the contribution to greenhouse gas emissions could be part of the Integrated Transport</p>	<p>Include direction to consider reliance on private vehicles as part of the Integrated Transport Assessment tool (for example: <a href="https://at.govt.nz/about-us/manuals-guidelines/integrated-">https://at.govt.nz/about-us/manuals-guidelines/integrated-</a></p>

Provision or Section	Comment/Reasons	Amendments Sought
	Assessment.	<a href="#">transport-assessment-guidelines/preparing-an-ita/</a> .
Minimum Carparking standards (TR-S16)	Requiring minimum off-street carparking provision for activities in South Wairarapa and Carterton creates an inconsistent approach between districts under the same District Plan and would make South Wairarapa and Carterton the regional exception.	We encourage implementation of the NPS-UD direction to remove mandatory off-street carparking requirements across the whole of Wairarapa for greater consistency, and to have regard to RPS direction on land use efficiency.
Natural hazards provisions – general comment	Greater Wellington broadly supports the direction of the hazards provisions and related provisions in the coastal environment and subdivision chapters of the proposed Wairarapa Combined District Plan. In particular, Greater Wellington supports the implementation of the risk-based approach that is in line with the RPS hazard policies.	Greater Wellington would like to see a more nuanced approach to the management of fault rupture and liquefaction risks and an acknowledgement of the risks presented by slope failure, especially as these will be exacerbated by more intense rainfall events as we have witnessed in recent years.
Natural hazards chapter introduction	<p>Sea level rise is already affecting our coastal environment and is being exacerbated by regional tectonic subsidence.</p> <p>Natural features can be preserved or enhanced to help protect against the impacts from natural hazards. Likewise, the environment can also be harmed by hazard mitigation measures. This should be included in the discussion as it links to NH-O1 and NH-O2.</p>	<p>Amend commentary:</p> <p>...and sea level <u>that has already risen over 0.2 m over the past 100 years, exacerbated by regional tectonic subsidence, will continue</u> to rise over the next 100 years.</p> <p>Include a subheading '<i>Natural features and environment</i>' with a brief discussion of the important role that natural features and the environment can have in attenuating and absorbing the impacts from natural hazards and also the adverse effects that our activities and hazard mitigation measures can have on these natural features or cause unintended consequences by exacerbating risk from natural hazards e.g., land effects erosion from seawalls or redirection of flood waters into adjacent areas as a result of earthworks.</p>
Table NH-1	It is important to define the hazard categories used in the District Plan however they should also sit within the definitions section, for ease of use. Alternatively, the definition of Hazard Areas could refer to Table NH-1, as suggested in feedback on this definition.	<p>Include in the definitions chapter OR Refer to this table in the definitions chapter.</p> <p>Amend as follows:</p>

Provision or Section	Comment/Reasons	Amendments Sought
	<p>Consider a more nuanced approach and include using the Fault Avoidance Zones (FAZ) identified in the GNS report instead of relying solely on the Recurrence Interval (RI) classes, as the FAZs have a more robust scientific and planning practice underpinning and the recurrence interval of faults in the Wairarapa is not always well known. Faults that are well defined should be classified as high hazard areas regardless of the RI as the Christchurch experience has taught us, where many of those faults had RIs &gt;5000 years.</p> <p>The hazard provisions need to take account of slope failure hazards as these can present significant risks to development and will be exacerbated by increasingly intense rainfall events driven by climate change.</p> <p>Some areas of the Wairarapa have a high liquefaction potential such as around Wairarapa Moana. Consequently, liquefaction hazard need to be addressed more fully. Rather than defining a single zone of liquefaction potential, there needs to be at least 2 zones that account for very high to high liquefaction hazard potential areas and moderate to low liquefaction potential areas.</p>	<p>High hazard area:            Fault hazard area – <u>well defined and well defined extended FAZs with Recurrence Interval (RI) classes I-IV (RI ≤10,000 years)</u>  <u>uncertain constrained and distributed FAZs with (RI) class I-II (RI ≤3500 years)</u>            Flood hazard – river corridors  <u>Very steep slopes (&gt;35°)</u></p> <p>Moderate hazard area: Fault hazard area – <u>uncertain constrained, uncertain poorly constrained and distributed FAZs with RI class III-IV (RI ≤5000 years)</u>            Flood hazard – overland flow path  <u>Steep slopes (26 – 35°)</u>  <u>Very high to high liquefaction potential areas</u></p> <p>Low hazard area:            Fault hazard area – <u>RI classes V-VI (RI &gt;10,000 years)</u>            Flood hazard – ponding <del>Possible liquefaction prone area</del>  <u>Moderate to low liquefaction potential areas</u>  <u>Moderately steep slopes (21 – 25°)</u></p>
Table NH-1 High hazard area	The inclusion of 'Flood hazard – river corridors' as a high hazard area is appropriate.	Retain as drafted
Table NH-1 Moderate hazard area	The inclusion of 'Flood hazard – overland flow path' as a moderate hazard area is appropriate.	Retain as drafted
Table NH-1 Low hazard area	The inclusion of 'Flood hazard – ponding' as a low hazard area is appropriate.	Retain as drafted

Provision or Section	Comment/Reasons	Amendments Sought
NH-O1	We support this policy.  Replace 'not increased' with minimised to be consistent with the RPS and Proposed RPS change 1.	Amend the objective: "The risk and consequences from natural hazards <u>and the impacts of climate change</u> on people, property, infrastructure, and the environment are <del>not increased</del> <u>minimised</u> ."
NH-O2	Include nature-based solutions and include definition to be consistent with the RPS and Proposed RPS Change 1.	Amend the objective: "Natural features <u>and nature-based solutions</u> are used to reduce the susceptibility of people, communities, property, and infrastructure to damage from natural hazards."  Add new definition for nature-based solutions.
NH-O3	The wording of this objective is generally consistent with the expectations of Greater Wellington in respect to the use natural features to reduce susceptibility to damage from natural hazards.	Retain as drafted
NH-P1	Greater Wellington supports a risk-based approach to manage subdivision use and development within the identified areas, specifically sensitive to impacts and the hazard posed to lives and wellbeing.  This policy gives effect to RPS policy 29.	Retain as drafted
NH-P2	This policy aims to avoid locating hazard sensitive and potentially hazard sensitive activities within areas of high hazard unless there is an operational or functional need, which is acceptable.  This policy gives effect to RPS policy 29.	Retain as drafted
NH-P3	This policy aims to only allow hazard sensitive and potentially hazard sensitive activities within areas of moderate hazard where the circumstances listed in the policy can be met, which is acceptable.  Include a requirement to consider the impacts on the natural environment and natural features from hazard mitigation measures.	Include a new clause:  4. Any hazard mitigation measures minimise adverse effects on the natural environment and prioritise the use of nature-based solutions where appropriate.

Provision or Section	Comment/Reasons	Amendments Sought
NH-P4	<p>This policy aims to provide for hazard sensitive and potentially hazard sensitive activities within areas of low hazard where mitigation is provided and the risk to other properties and activities is not increased, which is acceptable.</p> <p>Include a requirement to consider the impacts on the natural environment and natural features from hazard mitigation measures.</p>	<p>Include a new clause:</p> <p>3. Any hazard mitigation measures minimise adverse effects on the natural environment and prioritise the use of nature-based solutions where appropriate.</p>
NH-P5	<p>Allowing for less hazard sensitive activities to occur within all hazard areas where appropriate, is considered acceptable. The requirements listed in the policy are appropriate.</p> <p>Include a requirement to consider the impacts on the natural environment and natural features from hazard mitigation measures.</p>	<p>Include a new clause:</p> <p>4. Any hazard mitigation measures minimise adverse effects on the natural environment and prioritise the use of nature-based solutions where appropriate.</p>
NH-P6	<p>Discouraging new buildings in the overland flow path and ponding areas is generally appropriate, where the requirements listed in the policy can be met.</p> <p>Include a requirement to consider the impacts on the natural environment and natural features from hazard mitigation measures.</p>	<p>Include a new clause:</p> <p>5. Any hazard mitigation measures minimise adverse effects on the natural environment and prioritise the use of nature-based solutions where appropriate.</p>
NH-P7	<p>We support this policy and agree that emergency service facilities should be located in order to ensure their operation during natural hazard events.</p> <p>However, emergency service facilities are listed as a hazard sensitive activity, where Policies NH-P3 and P4 already appear to provide for these facilities within moderate and low hazard areas. It is unclear why emergency facilities are treated differently and by an individual policy.</p>	<p>Amend to provide clarity or delete in its entirety</p>
NH-P8	<p>It is appropriate this is provided for, where there is an operational or functional need, is appropriately designed and significant adverse effects can be mitigated.</p> <p>Include a requirement to consider the impacts on the natural environment</p>	<p>Include a new clause:</p> <p>4. Any hazard mitigation measures minimise adverse effects on the natural environment and prioritise the use of nature-based solutions where appropriate.</p>

Provision or Section	Comment/Reasons	Amendments Sought
	and natural features from hazard mitigation measures. This will ensure it gives effect to RPS policy 52 and Proposed RPS change 1 amendments.	
NH-P9	It is appropriate to provide for earthworks undertaken within flood hazard areas, where they do not impede flood pathways and the risk is not increased as a result of the activity.	Retain as drafted
NH-P10	It is important to enable natural hazard mitigation works within hazard overlays when undertaken by relevant authorities, as these works significantly decrease the existing risk of these hazards to people's lives, wellbeing, property and infrastructure.  Include a requirement to consider the impacts on the natural environment and natural features from hazard mitigation measures.	Amend the policy:  Enable natural hazard mitigation or stream and river management works undertaken by a statutory agency or their nominated contractors or agents within hazard areas where these will significantly decrease the existing risk to people's safety and wellbeing, property, and infrastructure, <u>and the works minimise adverse effects on the natural environment and where appropriate, prioritise the use of nature-based solutions.</u> "
NH-P11	It is appropriate to adopt a precautionary approach when planning for and adapting to the effects of natural hazards caused by climate change and sea level rise.  This policy gives effect to RPS policies 29 and 51.	Retain as drafted
NH-R1	It is appropriate to provide for flood mitigation or stream or river management works within any of the flood hazard overlays as a permitted activity, where these works are undertaken by a statutory agency or their nominated agency.	Retain as drafted
NH-R2	The wording of this rule is generally consistent with the example contained within the draft Greater Wellington Flood Hazard Planning Guidance document prepared by Greater Wellington.  Support if the requirement to consider the impacts on the natural environment and natural features from hazard mitigation measures is added to NH-P5	Amend NH-P5 as requested.



Provision or Section	Comment/Reasons	Amendments Sought
NH-R3	<p>We consider this rule to generally be appropriate for flood hazards, however, seek for the policy to be amended to account for a more nuanced approach to liquefaction and slope failure hazards between permitted and restricted discretionary activity status.</p> <p>We also seek that the 'and' is removed from the end of clause 2(a) and replaced with 'or' so that any of the conditions trigger restricted discretionary activity status.</p>	<p>Amend policies as follow</p> <ol style="list-style-type: none"> <li>1. Activity status: Permitted Where: <ol style="list-style-type: none"> <li>a. The activity or building is located within the <del>possible</del> moderate to low liquefaction-prone area.</li> </ol> </li> <li>2. Activity status: Restricted discretionary Where: <ol style="list-style-type: none"> <li>a. Any building located in a flood hazard overlay has a finished floor level above the 1% AEP level; <del>and</del> <u>or</u></li> <li>b. The activity is located within <del>the</del> <u>a low to moderate</u> fault hazard area <del>lower recurrence interval faults;</del> <u>or</u></li> <li>c. <u>Very high to high liquefaction potential areas;</u> <u>or</u></li> <li>d. <u>Steep or moderately steep slopes.</u></li> </ol> </li> </ol>
NH-R4	<p>As an overland flowpath is identified as a moderate hazard area, it is not appropriate to provide for additions within these overlays as a permitted activity and instead, resource consent should be obtained</p>	<p>Amend to remove 'overland flowpath' from Rule NH-R4(1)I, as follows:</p> <ol style="list-style-type: none"> <li>c. Any building additions located in the identified <del>overland flowpath</del> or ponding area of the flood hazard overlay have a finished floor level above the 1% AEP level.</li> </ol>
NH-R5	<p>We support this rule.</p>	<p>Retain as drafted</p>
NH-R6	<p>It is appropriate to require resource consent as a discretionary activity for any hazard sensitive activity and associated buildings within moderate hazard areas and low hazard areas.</p> <p>This policy gives effect to RPS policies 29 and 51.</p>	<p>Retain as drafted</p>
NH-R7	<p>It is appropriate to require resource consent as a discretionary activity for any hazard sensitive activity or potentially hazard sensitive activity and associated buildings within high hazard areas.</p> <p>This policy gives effect to RPS policies 29 and 51.</p>	<p>Retain as drafted</p>

Provision or Section	Comment/Reasons	Amendments Sought
Sites and Areas of Significance to Māori chapter	We support the provisions in this chapter, particularly SASM-P9. We recognise that there is a process underway to update Schedule 4.	We support the continued partnership with mana whenua / tangata whenua to update Schedule 4.
SASM-P6, SASM-P7 and SASM-P8	We strongly support the direction of these policies but seek to ensure they achieve the policy intent in practice.  We are interested to understand how these policies will be implemented.	Clarify how the e policies will work in practice.
ECO-O1	We support the intended direction of this objective to maintain and enhance biological diversity within the Wairarapa. We suggest replacing ‘enhance’ with ‘restore’ as it is more directive as to the state desired. ‘Enhance’ is ambiguous and can be taken to mean beyond the original state. ‘Restore’ is also consistent with the framing of ECO-P9. For clarity we suggest adding the definition for ‘restoration’ that is used in the NRP.	Suggested change:  Maintain and <del>enhance</del> <u>restore</u> the biological diversity of indigenous species and habitats within the Wairarapa”.  Add to definitions:  <u>Restoration: The rehabilitation of sites, habitats or ecosystems to support indigenous flora and fauna, ecosystem functions and natural processes that would naturally occur in the ecosystem and locality.</u>
ECO-O2	Objective 16 of the Regional Policy Statement (RPS) directs that indigenous ecosystems and habitats with significant biodiversity values are maintained and restored to a healthy functioning state. To give effect to this, ECO-P2 should protect existing significant vegetation and habitats and, where necessary, restore them. Protection is already signalled in ECO-P1, ECO-P2 and ECO-P4. Restoration is signalled in ECO-P9.	Suggested change:  “ <del>Protect the</del> Areas of significant indigenous vegetation and significant habitats of indigenous fauna within the Wairarapa <u>are protected</u> from inappropriate subdivision, use, and development, and <u>restored to a healthy functioning state</u> ”.
ECO-P1	We support this objective and suggest removing the term ‘enhancing’ and replacing with ‘restoring’ to align with suggested changes for ECO-O1.	Suggested change:  “Coordinate with other agencies and organisations in identifying risks, requirements, opportunities, and effective methods for protecting and <del>enhancing</del> <u>restoring</u> Wairarapa’s Biodiversity”.
ECO-P2	We support this objective and suggest removing the term ‘enhancing’ and replacing with ‘restoring’ to align with suggested changes for ECO-O1.	Suggested change:  “Collaborate with other agencies and organisations in

Provision or Section	Comment/Reasons	Amendments Sought
		undertaking joint initiatives and in supporting landowners' initiatives in the protection and <del>enhancement</del> <u>restoration</u> of biodiversity
ECO-P4	<p>The interaction between ECO-P4.3 and ECO-P6 is confusing as drafted. Both policies direct the application of the mitigation hierarchy/effects management hierarchy for activities within areas of significant indigenous vegetation or habitat. It is unclear what the relationship between the two policies is, and why there are two separate policies directing the same requirement. This is likely to lead to challenges with policy interpretation and implementation and may result in perverse environmental outcome</p> <p>We suggest that ECO-P4.3 is amended so that it:</p> <ol style="list-style-type: none"> <li>1. provides clear direction on what appropriate effects management actions would look like. The effects management hierarchy (also known as the 'mitigation hierarchy') is an internationally accepted approach to managing biodiversity and is considered to be one of the most important procedural instruments for protecting biodiversity from the impacts of development. We have provided suggested amendments for this, and these align with the wording in the NRP.</li> <li>2. uses avoid-minimise-remedy as the effects management sequence prior to offsetting, which is consistent with NRP Policy P41 on managing effects on significant biodiversity values<sup>1</sup>. This sequence is also consistent with the internationally utilised effects management hierarchy<sup>2</sup>, directed in the NZ Government guidance on biodiversity</li> </ol>	<p>Suggested amendments, with justification provided in 1 and 2:</p> <ol style="list-style-type: none"> <li>3. Requiring activities within or directly adjacent to these areas to <u>avoid, remedy, or mitigate the adverse effects on the values of the area; and</u> <ol style="list-style-type: none"> <li>I. <u>avoid more than minor adverse effects on indigenous biodiversity values, and</u></li> <li>II. <u>where more than minor adverse effects cannot be avoided, minimise them, and</u></li> <li>III. <u>where more than minor adverse effects cannot be avoided and/or minimise, they are remedied, and</u></li> <li>IV. <u>where residual adverse effects remain the use of biodiversity offsets may be proposed or agreed by the applicant</u></li> <li>V. <u>Where residual adverse effects cannot be redressed through the use of biodiversity offsetting the use of environmental compensation may be proposed or agreed by the applicant.</u></li> </ol> </li> </ol> <p>Suggested amendment, with justification provided in 3: A precautionary approach shall be used when assessing the</p>

<sup>1</sup> For extended justification see, Proposed Natural Resources Plan for the Wellington Region. 2018. *HS5 Officer's S42A Report - Wetlands and Biodiversity*, [http://pnrp.gw.govt.nz/assets/Uploads/HS5\\_Officer's-S42A-Report-Wetlands-and-Biodiversity.pdf](http://pnrp.gw.govt.nz/assets/Uploads/HS5_Officer's-S42A-Report-Wetlands-and-Biodiversity.pdf)

<sup>2</sup> Forest Trends Association. 2017. *BBOP: The mitigation hierarchy*, <https://www.forest-trends.org/bbop/bbop-key-concepts/mitigation-hierarchy/>  
Also see <https://academic.oup.com/bioscience/article/68/5/336/4966810> and <https://www.cbd.int/doc/strategic-plan/Post2020/postsbi/biodiversify1.pdf>

Provision or Section	Comment/Reasons	Amendments Sought
	<p>offsetting<sup>3</sup> and suggested by the EIANZ ecological impact assessment guidelines<sup>4</sup>. The key concern with the hierarchy as drafted is that consent applicants are directed to remedy adverse effects before they mitigate them. This is not possible. To ‘remedy’ is to rehabilitate, restore or restate something after an impact has occurred. To ‘mitigate’ is to moderate, reduce or alleviate an effect. Consent applicants should not be empowered, for example, to re-plant or otherwise restore damaged habitat (a remedy action) before considering how they might reduce the damage inflicted on that habitat (a mitigate action).</p> <p>3. include a sentence to direct a precautionary approach to effects management, as per RPS Policy 47(h) and NRP Policy 41. We have suggested wording to this effect.</p> <p>4. provide more direction on interpretation of biodiversity mitigation, offsetting and compensation. We think that applicants require clear direction when proposing mitigation, offsetting and compensation measures to avoid poor design and implementation. This direction could be provided in full in this policy, or provided as appendices. We suggest the use of appendices due to the level of detail needed.</p> <p>For clarity, we also suggest adding a definition for ‘biodiversity mitigation’ to the plan. Our suggestion aligns with the definition provided in the NRP.</p>	<p><u>potential for adverse effects on areas of significant indigenous vegetation or habitat.</u></p> <p>Suggested amendment, with justification provided in 4:</p> <p><u>Proposals for biodiversity mitigation, biodiversity offsetting and environmental compensation will be assessed against the principles listed in Appendix X (biodiversity mitigation), Appendix Y (biodiversity offsetting) and Appendix Z (environmental compensation).</u></p> <p><u>Where more than minor adverse effects on Significant Natural Areas cannot be avoided, minimised, remedied or redressed through the use of biodiversity offsets or environmental compensation, the activity is inappropriate.</u></p> <p>Add definition:</p> <p><u>Biodiversity mitigation: Mitigation is the abatement (lessening or repair) of the adverse effects of an activity, undertaken in direct response to, and at the same location as, that activity, designed and implemented in accordance with principles set out in Appendix X</u></p>

<sup>3</sup> NZ Government. 2014. Guidance on good practice biodiversity offsetting in New Zealand, <https://www.doc.govt.nz/globalassets/documents/our-work/biodiversity-offsets/the-guidance.pdf>, p. 18.

<sup>4</sup> Roper-Lindsay, J., Fuller S.A., Hooson, S., Sanders, M.D., Ussher, G.T. 2018. *Ecological impact assessment. EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems. 2nd edition.* Table 11 p. 90.

Provision or Section	Comment/Reasons	Amendments Sought
ECO-P5	<p>We suggest replacing the word 'enable' with 'only allow' to indicate the activity is only acceptable within certain constraints, i.e. where they "...contribute to the protection, maintenance, and enhancement of [areas of significant indigenous vegetation or habitat]".</p> <p>Removal of exotic vegetation within areas of significant indigenous vegetation or habitat is only beneficial if the exotic plant is a weed species. In other cases, the removal of exotic vegetation may remove habitat for native fauna or otherwise disturb the positive ecological processes or functions of the site. Well established exotic trees such as gums, wattles and pines often provide good roosting and feeding habitat for native species.</p>	<p>Suggested amendment</p> <p>"<del>Enable</del> <u>Only allow</u> the following activities relating to habitats comprising significant indigenous vegetation or significant habitats of indigenous fauna in the Wairarapa where they contribute to..."</p> <p>1. removal of broken branches, deadwood, <u>or</u> diseased vegetation, <del>or exotic species</del></p>
ECO-P6	<p>We do not support this policy for the reasons set out in our comments for ECO-P4, suggesting that ECO-P4 provides the direction for applying effects management hierarchy, while ECO-P6 support implementation of ECO-P4 by directing matters for which applicants should have 'particular regard to'. This gives effect to RPS Policy 47. We have provided some suggested wording for this.</p>	<p>Suggested wordings to incorporate in order to give full effect to RPS Policy 47:</p> <p><u>Only allow for subdivision, use or development within areas of significant indigenous vegetation or habitat following management of effects as in ECO-P4. In considering whether an activity is appropriate, particular regard shall be given to:</u></p> <ol style="list-style-type: none"> <li>1. <u>Maintaining connections within, or corridors between, habitats of indigenous flora and fauna, and/or enhancing the connectivity between fragmented indigenous habitats;</u></li> <li>2. <u>Providing adequate buffering around areas of significant indigenous vegetation or habitat from other land uses;</u></li> <li>1. <u>Managing wetlands for the purpose of aquatic ecosystem health;</u></li> <li>2. <u>Avoiding the cumulative adverse effects of the incremental loss of indigenous ecosystems and habitats;</u></li> </ol>

Provision or Section	Comment/Reasons	Amendments Sought
		<u>Protecting the life supporting capacity of areas of significant indigenous vegetation or habitat including their natural ecological processes and functions.</u>
ECO-R1	Support the provision for removal of a defined pest plant species list as a permitted activity, noting that we have suggested some amendments to the pest plant species list.  Support the provision for conservation and customary activities as a permitted activity.	Retain.
NATC-O1, NATC-P2 and all other relevant provisions	Greater Wellington agrees that natural character should be preserved, to give effect to section 6(a) of the RMA.  However, landward of the coastal environment, we note that the jurisdiction of the draft Plan does not need to extend beyond riparian margins. Natural character in the beds of rivers, lakes and wetlands fall in Greater Wellington's jurisdiction (both in the coastal environment and landward of the coastal environment) and therefore is managed through provisions in the Natural Resources Plan.	Amend NATC-O1 and NATC-P2 (and any other relevant provisions) to clarify that the jurisdiction of these provisions is restricted to riparian margins, landward of the coastal environment.
NATC-P3	It is appropriate to enable earthworks in proximity to significant waterbodies where they are for the purpose of maintenance works on infrastructure i.e., maintaining dams.	Retain as drafted
NATC-R1	It is appropriate to provide for earthworks within 25m of a significant waterbody as a permitted activity, where these works are for the purpose of maintenance of drains, dams, tracks, roads, or the construction or maintenance of a bridge or culvert, or part management activities in Open Space and Recreation Zones.  The proposed matters of discretion for resource consents associated with Rule NATC-R1(2) are considered appropriate as they include effects on the risks from natural hazards, including erosion and flooding.	Retain as drafted

Provision or Section	Comment/Reasons	Amendments Sought
NATC-R2	<p>It is appropriate to provide for modification of vegetation and associated earthworks within 25m of a significant waterbody as a permitted activity where these works involve identified pest plant species or are associated with primary production.</p> <p>The proposed matters of discretion for resource consents associated with Rule NATC-R2(2) are considered appropriate as they include effects on the risks from natural hazards, including erosion and flooding.</p>	Retain as drafted
Subdivision chapter	We support this chapter broadly. However, we seek the provisions to be strengthened in some areas.	See general comments on climate resilience, freshwater, nature-based solutions, and providing for urban growth.
Subdivision chapter and wastewater	<p>SUB-P2 requires suitable access to reticulated infrastructure (with sufficient capacity) in urban areas. Greater Wellington supports this requirement to connect to reticulated networks where available and seeking adequate infrastructure capacity.</p> <p>However, the District Plan should provide for approved alternative wastewater systems anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Septic tanks are excluded from this recommendation due to their known issues with leakage of untreated wastewater and nitrates, particularly when poorly maintained.</p> <p>Alternative wastewater treatment options often reduce potable water use significantly. Reducing pressure of new development on the wastewater network may also make intensification in some areas with existing network capacity constraints more feasible.</p> <p>Relevant direction from the operative RPS includes policies 16 and 45. Relevant direction from Proposed RPS Change 1 includes policies FW.2, FW.3 and FW.5 CC 14 and 42(r), FW.5 and 58. Regional plan rules would apply to</p>	Include direction in the Subdivision chapter to provide for decentralised wastewater re-use and treatment (of grey and black water) and disposal using approved alternative wastewater systems (but not septic tanks, due to their existing issues with contamination and leaching) anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network would still be required.



Provision or Section	Comment/Reasons	Amendments Sought
	discharges from all wastewater systems to manage potential impacts on groundwater and surface water quality, aquatic ecosystems and soil health. These requirements could feasibly be met by approved alternative wastewater systems in both brownfield development and greenfield development.	
SUB-O1 – SUB-O3	We support these objectives, however, consider that direction toward compact urban form could be clearer, to have better regard to Proposed RP Change 1 and the operative RPS direction. This direction also applies to future urban development through future greenfield areas.	Include direction toward infill development and compact urban form.
SUB-P1	Support with amendment to make it clear it includes public transport connectivity for subdivisions and new developments.	Amend to: g. results in good urban design outcomes by using measures to enhance urban environments such as Crime Prevention Through Environmental Design (CPTED), energy efficiency, and transport, including public transport, connectivity measures.
SUB-P2	Support with amendment to include public transport infrastructure such as bus stops.	Amend to: f. where consistent with the zone, providing for a variety of travel modes that reflect the purpose, character, and amenity values of the zone, including walking, cycling, and access to public transport and <u>public transport infrastructure</u> ; and
SUB-P4	It is appropriate to manage significant risks from natural hazards by avoiding any subdivision in specified circumstances.  New subdivision also needs to take account of future impacts from sea level rise and climate change	Modify clause d to account for a 100 year planning horizon as a result of potential impacts from climate change and/or sea level rise:  d. does not provide <u>reasonably foreseeable</u> safe, flood-free, and stable building platforms <u>at the time of subdivision over a 100 year horizon taking into account potential impacts from climate change and/or sea level rise.</u>
SUB-P7	We support this policy.	Retain

Provision or Section	Comment/Reasons	Amendments Sought
SUB (All matters of control)	It is appropriate to include references to natural hazards within all the matters of control. In several instances, these references should be more explicit by connecting to the relevant policies (primarily SUB-P4).	See specified amendments below.
SUB-R2	The proposed matters of control for resource consents associated with Rule SUB-R2(1) and SUB-R2(2) are considered appropriate as they include the effects on the stability of land and buildings, and potential to create new or exacerbate existing natural hazards.	Retain as drafted
SUB-R4	We support this policy, particularly the direction to restrict subdivision of lots greater than 4ha.  The proposed matters of control for resource consents associated with Rule SUB-R4(1) are considered appropriate as they include the effects on the stability of land and buildings, and potential to create new or exacerbate existing natural hazards. It is unclear why the sentiment of SUB-P4 has been added as a separate matter (Matters of control (12)). For clarity, Policy SUB-P4 should also be added to the list of other directly referenced policies (Matters of control (1)).	Amend to add SUB-P4 to Matters of control under Rule SUB-R (1), as follows:  <i>1. The matters set out in Policies SUB-P1, SUB-P2, <u>SUB-P4</u>, SUB-P5, and SUB-P6.</i>
SUB-R5	The proposed matters of control for resource consents associated with Rule SUB-R5(1) are considered appropriate as they include the effects on the stability of land and buildings, and potential to create new or exacerbate existing natural hazards. It is unclear why the sentiment of SUB-P4 has been added as a separate matter (Matters of control (12)). For clarity, Policy SUB-P4 should also be added to the list of other directly referenced policies (Matters of control (1)).	Amend to add SUB-P4 to Matters of control under Rule SUB-R4(1), as follows:  <i>1. The matters set out in Policies SUB-P1, SUB-P2, <u>SUB-P4</u>, SUB-P5, and SUB-P6.</i>
SUB-R6	It is appropriate to require resource consent as a controlled activity for the subdivision of land within or partially within hazard areas when building platforms are located in a low hazard area.  The proposed matters of control for resource consents associated with Rule SUB-R6(1) are considered appropriate as they include the matters set out in NH P4 as well as the effects on the stability of land and buildings, and	Retain as drafted

Provision or Section	Comment/Reasons	Amendments Sought
	potential to create new or exacerbate existing natural hazards.	
SUB-S7	Support with amendment to include public transport as a key part of the transport network.	Amend to: 3. The safe, efficient, and effective functioning of the transport network and its connectivity, including <u>public transport</u> , cyclist and pedestrian network connectivity.
ASW-P3	This policy aims to prevent locating structures on or over the surface of water in rivers, lakes, and wetlands unless there is an operational or functional need, which is acceptable i.e., flood defence systems, as noted in the policy.	Retain as drafted
Coastal environment chapter	Functional need or operational need is in regard to the CMA in isolation as opposed to the full extent of the coastal environment (see NZCPS Policy 6(e)).	Amend all relevant provisions so that functional need or operational need is not provided for in the terrestrial part of the coastal environment.
CE-O3	Replace 'not increased' with <i>minimised</i> to be consistent with the RPS and Proposed RPS change 1.  This objective needs to acknowledge the effects that sea level rise will have in exacerbating the risks from coastal hazards.	Amend the objective: "The risk and consequences from coastal hazards <u>and the impacts of sea level rise on people, property, infrastructure, and the environment are <del>not increased</del> minimised.</u> "
CE-P2	We support this policy, as it broadly gives effect to NZCPS Policy 13.	Retain as drafted
CE-P4	Replace 'not increased' in clause (j) with <i>minimised</i> to be consistent with the RPS and Proposed RPS change 1	Amend clause j: j. "ensuring that the location, design and scale of structures, buildings, and activities avoid or mitigate risks to people and property from coastal hazards and that the risk to other people, properties, and activities is <del>not increased</del> <u>minimised</u> ; and..."
CE-P8	New development should be avoided in the foreshore protection area due to the risks from coastal hazards and sea level rise.	Amend clause 2 to avoid new development in the foreshore protection area: l. "avoid new <del>residential activities</del> <u>hazard sensitive activities and potentially hazard sensitive activities</u> within the Foreshore Protection Area; and..."
CE-P9	This policy gives effect to RPS policy 52.	Retain as drafted.

Provision or Section	Comment/Reasons	Amendments Sought
<b>Part 3: Area Specific Matters</b>		
General Residential Zone chapter and transport	Public transport access needs to be added into this chapter. In order to achieve mode shift targets for the region, public transport needs to be integrated into residential zones and connect residents to key facilities.	Include provision for public transport, including supporting public transport infrastructure in residential zones.  Also see general comment on providing for urban growth.
GRZ-P1, GRZ-P2, GRZ-P6	While we support the direction of these policies, we note that there remains emphasis on character and consider the benefits of housing variety could be more prominent.  The policies on character and amenity could also include NPS-UD Objective 4 direction to recognise that urban environments, including amenity values develop and change over time.	Re-consider the emphasis on character in the policies.
GRZ-P4, GRZ-P5	The emphasis on spacious settings in these policies could be reduced to signal a clearer shift toward infill development.	Provide for intensification in some parts of the GRZ more clearly.
GRZ-P7	We strongly support the avoidance of development with insufficient reticulated infrastructure, or occurring out of sequence with planned infrastructure. This is aligned with operative RPS direction. Note that Proposed RPS Change 1 also applies this requirement to other development infrastructure, including provisions for multi-modal and public transport infrastructure.	Considering additional policy direction for infrastructure other than reticulated infrastructure.
GRZ-P8, GRZ-S8	Greater Wellington strongly supports the requirement for rainwater tanks on new dwellings, noting that there are also other measures to improve water resilience and reduce water demand that could be utilized, e.g. water metering, low-flow devices, approved alternative waterless wastewater systems.	Retain, and consider other measures to improve water resilience and reduce water demand.
GRUZ-P5, GRUZ-R11	We support the direction to require resource consents for quarries that are not on-farm quarries, as this will complement consenting under the regional plan.	Retain as drafted.

Provision or Section	Comment/Reasons	Amendments Sought
Rural Lifestyle Zone	<p>The 0.5ha minimum lot size in this zone is not sufficient to mitigate the potential effects on water quality from the on-site servicing for water supply and wastewater that is promoted by the draft Plan. While we support efficient use of land, 0.5ha does not provide for sufficient separation distances between on-site wastewater systems and drinking water wells, to ensure the health and well-being of people. This density of dwellings with on-site wastewater systems will make additional contribution to nutrient load in the catchments.</p> <p>The mapped rural lifestyle zone adjacent to the General Residential Zone north of Masterton is partly located in the Waipoua catchment which is a Schedule Y Priority Catchment for Nutrient Management under the regional plan. The additional load of nutrients created by the potential density of dwellings in the rural lifestyle zone is not compatible with the outcomes for the catchment.</p>	<p>Revise the minimum lot size or consider options for collective wastewater options across this zone.</p>
RLZ-S5, SUB-S4	<p>The specific reference to septic tanks or soakage fields should be updated to refer to on-site domestic wastewater treatment and disposal.</p> <p>The standards should provide for using approved alternative wastewater systems for decentralised wastewater re-use and treatment (of grey and black water) and disposal anywhere where there are constraints on the existing network capacity, as well as where connections aren't available.</p> <p>This standard should also refer to additional requirements for on-site wastewater discharge under the Natural Resources Plan.</p>	<p>Amend wording as follows:            'Where a connection to Council's reticulated wastewater systems is not available, all allotments must be provided with <b>on-site wastewater systems</b> <del>a septic tank or soakage field</del> or an approved alternative means to dispose of sewage in a sanitary manner...'</p> <p>Provide for the possibility of de-centralised wastewater re-use and treatment (of grey and black water) and disposal using alternative approved wastewater systems anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network would still be required.</p> <p>Amend to refer to additional requirements for on-site</p>

Provision or Section	Comment/Reasons	Amendments Sought
		wastewater discharge under the Natural Resources Plan.
TCZ-P1	Need to include provision for public transport and active mode activity in town centres to support mode shift.	Add in: g. public transport and active mode activities, including infrastructure.
Māori Purpose Zone chapter	We support the provisions in this chapter, as they appear to be consistent with Proposed RPS Change 1 Policies UD.1 and UD.2.	Retail
MPZ-P1, MPZ-R10, MPZ-R14	We query the need to limit commercial activities being provided for to 'small scale'; considering MPZ-O1 and MPZ-O2.	Provide for commercial activities in this zone without restricting them to small-scale.
Papakāinga provisions in zones chapters	We strongly support the provision for papakāinga in the residential and rural zones.  We seek that this also applies to the town centre zone and mixed use zone	All provide for papakāinga in the town centre zone and mixed use zone.
Future urban zones	We support the approach to undertake greenfield in integrated and planned way.	See our comments on the approach to providing for urban growth and the extent and location of the zones.
<b>Designations (Operative Wairarapa Combined District Plan)</b>		
Masterton District (Dm002 to DM006)	It is appropriate that the existing designations from this Requiring Authority (Greater Wellington Regional Council) are for the purpose of flood protection and mitigation or the conveyance of water for flood mitigation.	Request that these designations are rolled over from the Operative Wairarapa Combined District Plan into the notified Combined District Plan.
Carterton District (Dc013 to Dc013c)	Currently designations and stopbanks control activities around critical flood defence assets and floodways	Greater Wellington would like to workshop designations next calendar year, including roll over of current, new infrastructure around Greytown and Te Kāuru buffer zones.
South Wairarapa District (Ds006 to Ds027)	Greater Wellington also would like to discuss designations to support new flood defence infrastructure around Greytown and Te Kāuru.	

Provision or Section	Comment/Reasons	Amendments Sought
<b>Overlays and Zones</b>		
Flood Hazard Mapping	<p>Flood hazard maps are not included in the draft Wairarapa Combined District Plan. Greater Wellington will provide flood hazard maps for the significant water courses that we manage once they are finalised in early 2023. Greater Wellington are currently undertaking community engagement on the draft maps in parallel with the draft Combined District Plan consultation period.</p> <p>Greater Wellington will not provide stormwater or pluvial flood hazard mapping. This is a TA responsibility and we expect it to be mapped and considered in the Combined District Plan. We note that the recent flooding in Masterton on Wednesday 16 November 2022 was the result of localised stormwater flooding.</p> <p>Our feedback does not comment on zoning locations with respect to flood hazard and this must be undertaken during the consultation on the notified Combined District Plan next year.</p>	N/A
Natural Character Mapping, Schedule 9, Schedule 10	<p>We support the mapping and scheduling of sites of outstanding and high/very high natural character. However, there are no wider area scale natural character ratings mapped or scheduled in the draft plan change. These were assessed in the 2020 Wairarapa Natural Character assessment.</p> <p>Adverse effects on natural character cannot be effectively managed at a site in isolation and should be considered in the broader context of the coastal environment.</p>	Map and schedule wider area scale natural character ratings (from the 2020 Wairarapa Natural Character assessment) in the terrestrial part of the coastal environment, in areas outside of Greater Wellington jurisdiction (beds of lakes, rivers and wetlands).



Provision or Section	Comment/Reasons	Amendments Sought
Masterton Urban Water Supply protection zone	<p>The buffer zone around the Masterton urban water supply does not align with Community Drinking Water Supply Protection Areas under the regional plan, as well as the associated policies and rules for this water supply. There are also no similar zones created for other drinking water protection zones, which is an inconsistent approach.</p> <p>The regional plan Schedule M currently has Community Drinking Water Supply Protection Areas for Carterton, Martinborough and Masterton created from scientifically derived area of source water for each water supply</p>	We seek for all Community Drinking Water Supply Protection Areas in Schedule M of the regional plan to be included in the District Plan's layer for information when considering the location of urban development.
Medium Density Residential Precinct	<p>Greater Wellington supports the use of a Medium Density Residential Precinct in Masterton, however, consider that it could also be applied outside of Masterton.</p> <p>We seek consideration of whether parts of Carterton and Featherston are suitable for medium density, provided that the development infrastructure is provided for. This would align with direction from the Carterton Housing Action Plan, which recognises a desire for a range of housing and section sizes and particularly smaller houses, as well as the Featherston Masterplan, which is signaling a need for increased densities</p> <p>The Combined District Plan sets the direction for urban development for the next 10 years. Providing for intensification in the right places presents a real opportunity for the District Plan to provide for urban growth in a way that provides for a variety of housing and has regard to Proposed RPS Change 1.</p>	Apply the Medium Density Residential Precinct to those areas of Carterton and Featherston which meet the criteria in Policy 31(c) of Proposed RPS Change 1.

Provision or Section	Comment/Reasons	Amendments Sought
Future Urban Zones and Rural Lifestyle Zone	<p>All identified future urban zones and the new rural lifestyle zone are partially or entirely on Land Use Capability class 1, 2 or 3 rural land. Carterton East and Greytown East, in particular, are on LUC class 2 land.</p> <p>While we recognise that some of these areas have already been identified for urban development and so do not meet clause 3.5(7) of the National Policy Statement for Highly Productive Land (NPS-HPL), we do not consider providing for urban development across these areas gives effect to Policies 56 (development in rural areas), 59 (retaining the productive capacity of highly productive land) and Objective 22 of the operative RPS (compact urban form).</p>	<p>Re-consider the extent of the Future Urban Zones given:</p> <ul style="list-style-type: none"> <li>• their potential value for productive capability and the remaining potential for infill development within existing urban areas,</li> <li>• the relevance of the NPS-HPL Clause 3.5(7) for those areas not already identified in a growth strategy, and</li> <li>• the need to give effect to the operative RPS.</li> </ul>
<b>Appendices and Schedules</b>		
Schedule 7	<p>This schedule does not set out the values which define Outstanding Natural Features and Landscapes (ONFL) in the Wairarapa. If the values of ONFL are not included in Schedule 7, it is unlikely that the potential effects from activities on the relevant ONFL will be managed appropriately through consent processes.</p>	<p>Include values of the ONFL in Schedule 7. These values include natural sciences, sensory, shared and recognised values.</p>
Schedule 9, Schedule 10	<p>Greater Wellington supports the inclusion of areas of outstanding natural character (Schedule 9) and sites of high/very high natural character (Schedule 10), however notes that none of relevant natural character values (biotic, abiotic and experiential) are set out in the schedule. Including the values in the schedule will ensure that consent processes can manage the potential effects on the relevant values in a targeted way, to give effect to NZCPS Policy 13.</p>	<p>Include relevant biotic, abiotic and experiential values in the schedules of outstanding and high/very high natural character.</p>

Provision or Section	Comment/Reasons	Amendments Sought
<p>Appendix ECO-1: Pest Plant Species</p>	<p>We note that the current pest plant list is the Regional Pest Management Plan 'Harmful Organism' list, so contains some species which aren't appropriate or relevant in this context.</p> <p>The plant list should ideally be composed of species expected to be found around and within both significant natural areas and significant waterbodies in the. A good source of information could be Wairarapa KNE plan and wetland programme weed lists.</p> <p>We have suggested some additions.</p>	<p>We suggest adding the following species to the pest plant list, but are happy to work with you on this further:</p> <ol style="list-style-type: none"> <li>1. Species that are under management programmes in the RPMP that could be added, because the management programme only applies to Hutt City Council boundaries: <ul style="list-style-type: none"> <li>• Banana passionfruit</li> <li>• Cathedral bells</li> <li>• Old mans beard</li> </ul> </li> <li>2. Species in the RPMP under a Sustained Control programme, but we only control it in certain coastal areas and could benefit from control outside of non-productive coastal habitat: <ul style="list-style-type: none"> <li>• Boneseed</li> </ul> </li> <li>3. Species our Biosecurity officers have encountered in the Wairarapa: <ul style="list-style-type: none"> <li>• <i>Agapanthus praecox</i></li> <li>• <i>Arundo donax</i></li> <li>• <i>Laurus nobilis</i></li> <li>• <i>Bidens frondosa</i></li> <li>• <i>Asparagus aethiopicus</i></li> <li>• <i>False fox-sedge - Carex otrubae</i></li> <li>• <i>Hieracium lepidulum</i></li> <li>• <i>Marrubium vulgare</i></li> <li>• <i>Fatsia japonica</i></li> <li>• <i>Tropaeolum pentaphyllum</i></li> <li>• <i>Hypericum androsaemum</i></li> <li>• <i>Iris pseudacorus</i></li> </ul> </li> </ol>

Provision or Section	Comment/Reasons	Amendments Sought
Appendix -X Biodiversity Mitigation	We suggest a new appendix to clearly articulate the principles that must be applied when proposing and considering biodiversity mitigation. We suggest aligning the wording of this appendix with the principles for biodiversity mitigation as they are set out in Schedule G1 of the Natural Resources Plan.	Include a new “Biodiversity Mitigation” appendix to provide the framework of principles that must be used when assessing the adequacy of a mitigation proposal.
Appendix Y: Biodiversity Offsetting	We suggest insertion of a new appendix to clearly articulate the principles that must be used to guide the development of biodiversity offsets. We suggest aligning the wording of this appendix with the principles for biodiversity offsetting as they are set out in Schedule G2 of the Natural Resources Plan.	Include a new “Biodiversity Offsetting” appendix to provide the framework of principles that must be used when assessing the adequacy of an offset proposal.
Appendix Z: Biodiversity Compensation	We suggest a new appendix to clearly articulate the principles that must be used to guide the development of Biodiversity Compensation proposals. We suggest aligning the wording of this appendix with the principles for biodiversity compensation as they are set out in Schedule G3 of the Natural Resources Plan.	Include a new “Biodiversity Compensation” appendix to provide the framework of principles that must be used when assessing the adequacy of a biodiversity compensation proposal.
<b>Engineering Development Standards</b>		
Engineering Development Standards	<p>Greater Wellington supports the development of engineering standards as a means to provide methods for compliance against the District Plan.</p> <p>Greater Wellington recommends that Wellington Water and Greater Wellington are provided an opportunity to provide input into the final draft of the standards with the objective of getting regional consistency in water standards.</p>	Greater Wellington requests opportunity to collaborate on Engineering Standards with Wellington Water for stormwater standards