

Proposed Change 1 to the Regional Policy Statement for the Wellington Region - Submission Form (Form 5)



The closing date for submissions is 5pm Friday 14 October 2022.

How to make a submission:

- Online at www.gw.govt.nz/rpschange1 using the Spoken submission portal.
Email your submission and this form to us at: regionalplan@gw.govt.nz
Post your submission and this form to us at: Environmental Policy, PO Box 11646, Manners St, Wellington 6142, ATT: Hearings Adviser
Drop your submission and this form to reception at one of Greater Wellington's offices.

Privacy statement - To read our Privacy Statement please visit:

https://www.gw.govt.nz/assets/Documents/2022/08/Privacy-Statement-RPS-Change-2022.pdf

All submissions (including name and address for service) are published and made publicly available on our website. Your name and address for service will be used for correspondence during the submission and hearing process. All information collected will be held by Greater Wellington Regional Council and our agent managing the Spoken submissions portal. You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. Please contact us at privacy@gw.govt.nz.

Submission on Proposed Change 1 to the Regional Policy Statement for the Wellington Region.

1. Details of submitter: Name(s) and Address for service

Name (First and Last) OR Organisation/ Company:

Solitaire Robertson

Phone:

(06) 379 4030

Address for service:

Carterton District Council

(Physical Address OR Email)

28 Holloway Street, Carterton

Contact person for submission:

Solitaire Robertson

(If different to above)

I wish to be heard in support of my submission at a hearing:

Yes /No

I would consider presenting a joint case at the hearing with others who make a similar submission:

Yes /No

2. Disclosures:

I could gain an advantage in trade competition through this submission:

Yes /No

Only answer this question if you ticked 'yes' above:

Yes / No

I am directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

Note: If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I confirm that I have permission to provide this information, and that I have read and understood the Privacy Statement:

Signature: Solitaire Robertson

Date: 11/10/2022

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### 3. Submission:

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Multiple provisions can be commented on within the following section. Feel free to use additional pages if necessary.

The specific provisions of the proposal that my submission relates to are:

| <i>Provision (i.e. issue, objective, policy, method, definition)</i> | <i>Support/Oppose</i> | <i>Decision Sought</i><br><i>What changes you would like to see?</i> | <i>Reasons</i><br><i>Please provide reasons for your views</i> |
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SEE ATTACHED SUBMISSION

11 October 2022

Greater Wellington Regional Council  
PO Box 11646  
Wellington 6011  
via email: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

Tēnā koe,

**Submission: Proposed Change 1 to the Regional Policy Statement (RPS) for the Wellington Region**

Please find attached Carterton District Council's submission on the proposed change 1 to the Regional Policy Statement (RPS) for the Wellington Region.

Note – Carterton District Council would like the opportunity to speak to their submission at a hearing and would consider presenting a joint case at the hearing with others who have made a similar submission.

Thank you in advance for the consideration.

Ngā mihi nui,



Geoff Hamilton  
**Chief Executive Officer**  
Carterton District Council  
[geoffh@cdc.govt.nz](mailto:geoffh@cdc.govt.nz)

### **General comments**

Overall, Carterton District Council (CDC) supports the intent of Plan Change 1. In particular, CDC is generally supportive of the improved framework for natural hazards, urban development and climate change mitigation and adaptation. CDC's concerns are primarily with the equity and roles of regional and district councils in implementation of Plan Change 1 across the districts within the region and whether some of the climate change and urban development goals are realistic on a district-by-district basis.

The amendments proposed via Plan Change 1 would require CDC and other district councils in the region to change their District Plans (or in the Wairarapa's case, to incorporate into the proposed Wairarapa Combined District Plan (WCDP) in 2023 or later via variation) to give effect to RPS provisions that are not supported by the RMA or any existing higher-level statutory planning document. This means that the proposed WCDP may be vulnerable to challenge through submissions and Environment Court processes (at the Wairarapa Councils' expense).

### **Climate change**

CDC is concerned that the Wairarapa will be used as a 'carbon sink' to offset emissions that are created by other Councils in the region – i.e., that the generation versus offset of emissions will be highly disproportionate in the eastern and western parts of the Greater Wellington region. CDC is particularly concerned that the Wairarapa will be subject to significant afforestation to offset emissions from the wider region.

While the RPS is necessarily high-level and does not prescribe how emissions might be reduced and offset across the different districts, CDC requests that further guidance is included in the Plan Change to make it clear how reduction and offsetting will be implemented equitably.

CDC is generally supportive of initiatives that encourage and provide for public and active transport. However, CDC is concerned that the climate change and urban development policies requiring the provision for public transport and active transport do not recognise differences in the nature and scale of urban areas and transport networks across the region. As a rural district, CDC is keen to support public, active, and multimodal transport where this is practical, but seeks a softened approach for the Wairarapa, to recognise that these cannot always serve rural communities and small towns in the same way as cities.

Finally, it is unclear what RMA or higher-level statutory documents most of the climate change provisions are giving effect to. The Plan Change and s32 report do not provide any clear links. CDC requests that GWRC clearly links each objective and policy with the relevant higher-order document so that the impetus for each provision is clear.

### **Freshwater**

While most of the freshwater provisions relate to regional plans only, there are some provisions which require implementation by district councils. For example, Policy 15 requires a more holistic assessment of the effects of earthworks and vegetation clearance by both regional and district councils. CDC does not have the in-house freshwater or biodiversity expertise to usefully and accurately assess any applications that result from district plan rules required by this policy. These

assessments are better undertaken by GWRC for regional-scale earthworks, and the matters required to be addressed by this policy sit more comfortably with regional council functions. CDC requests that the provisions are amended so that an assessment of effects on freshwater is only required under regional plans.

#### **Natural hazards and resilience**

CDC is generally supportive of the amendments to the natural hazards and resilience provisions, noting that the Natural Resources Plan and the draft Wairarapa Combined District Plan have taken a similar approach in requiring or using a risk-based framework.

#### **Energy**

CDC also supports the amendments that seek to better enable small- and community-scale renewable energy generation. The draft Wairarapa Combined District Plan is consistent with the direction in this policy.

#### **National Policy Statement on Highly Productive Land**

CDC notes that the National Policy Statement on Highly Productive Land (NPS-HPL) was released after Plan Change 1 was notified.

CDC requests that any amendments to the RPS to give effect to the NPS-HPL be undertaken via a variation or a separate future plan change, as the consequences of any amendments would likely be significant and should therefore be subject to a full and separate Schedule 1 process.

#### **Use of Freshwater Planning Process**

CDC is concerned with the breadth of the Plan Change content that is considered subject to the Freshwater Planning Process (FPP), rather than the Schedule 1 process. The FPP process provides limited scope for future public input, and CDC is very concerned that a large number of provisions are subject to the FPP where freshwater is not the primary issue and is instead peripheral or only one of several issues to which the provision relates. This is an inappropriate use of the FPP process.

CDC requests that the scope of the FPP versus Schedule 1 processes is reviewed and that only those provisions where freshwater is the primary issue are subject to the FPP. For example, all provisions in Chapter 3.1A and Chapter 3.9 should be excluded from the FPP process, as they address broader issues relating to climate change and urban development, respectively.

#### **Decisions Sought**

CDC requests the above matters are retained, amended or deleted from the plan change as set out above. In addition to the above general relief sought, decisions sought on specific provisions are detailed in the table below.

## Submission table

| Provision   | Support/<br>oppose | Decision sought  | Submission/Reasons   |
|---|--------------------|--|--|
| <b>Chapter 3.1A: Climate Change</b>   |                    |  |  |
| <p><b>Objective CC.1</b></p> <p><i>By 2050, the Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</i></p> <p>a) <i>sustainable air, land, freshwater, and coastal management,</i></p> <p>b) <i>well-functioning urban environments and rural areas, and</i></p> <p>c) <i>well-planned infrastructure.</i></p> | Support            | Retain the objective.  | CDC supports this objective.   |
| <p><b>Objective CC.2</b></p> <p><i>The costs and benefits of transitioning to a low emission and climate-resilient region are shared fairly to achieve social, cultural, and economic well-being across our communities.</i></p>  | Support in part    | Provide better guidance on how this objective and related policies should be implemented by district councils. | <p>While CDC supports the intent of this objective, the RPS does not provide sufficient direction on how this objective is be achieved or implemented. For example, it is uncertain how consistency with this objective would be addressed in a district plan or as part of assessment of a consent application.</p> <p>Additional methods or clear non-statutory guidance would assist with ensuring that this objective is effectively implemented and achieved.</p> |

| Provision  | Support/ oppose | Decision sought  | Submission/Reasons   |
|--|-----------------|--|--|
| <p><b>Objective CC.3</b></p> <p><i>To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced:</i></p> <p>a) <i>By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels, including a:</i></p> <ul style="list-style-type: none"> <li>i. <i>35 percent reduction from 2018 levels in land transport generated greenhouse gas emissions, and</i></li> <li>ii. <i>40 percent increase in active travel and public transport mode share from 2018 levels, and</i></li> <li>iii. <i>60 percent reduction in public transport emissions, from 2018 levels, and</i></li> </ul> <p>b) <i>By 2050, to achieve net zero emissions.</i></p> | Oppose          | <p>Provide better guidance on how the objective will be implemented equitably.</p> <p>Remove ‘agriculture’ from the objective.</p> <p>Amend ‘net zero emissions’ to use consistent language that is appropriate in an RMA framework.</p> | <p>While CDC supports the RPS providing clear goals for emission reduction, it is concerned that there will be inequities in the way these targets are intended to be met. As CDC is a predominantly rural environment, with the town functioning as a rural service area, the transport emissions targets are potentially unrealistic for Carterton and the wider Wairarapa. It is unclear how Objective CC.3 is consistent with Objective CC.2 about fairly sharing costs and benefits.</p> <p>CDC is concerned that the targets set in the RPS go well beyond those in the Climate Change Response (Zero Carbon) Amendment Act 2019.</p> <p>The Paris Agreement (incorporated into the CCRA Act 2019) seeks to reduce greenhouse gas emissions by 30% below the 2005 level, not the 2019 level, by 2030.</p> <p>CDC is also very concerned that agriculture is included in this policy. The CCRA excludes biogenic methane from the overall 2030 and 2050 targets, and sets a separate target for this. CDC requests reference to ‘agriculture’ is removed from this objective, and that further information on alignment with government targets is provided for this objective.</p> |

| Provision   | Support/ oppose | Decision sought   | Submission/Reasons   |
|---|-----------------|---|--|
|   |                 |   |  |
| <p><b>Objective CC.5</b></p> <p><i>By 2030, there is an increase in the area of permanent forest in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social and economic wellbeing.</i></p> | Support in part | <p>Retain the policy.</p> <p>Seeks early engagement with GWRC in the development of a regional forest spatial plan.</p>             | CDC supports the increase in permanent forest across the region, but is concerned that the Wairarapa will be disproportionately affected by an increase in carbon farming. CDC seeks early involvement of a regional forest spatial plan to ensure that Carterton district is not expected to provide inequitable areas of forestry. |
| <p><b>Objective CC.6</b></p> <p><i>Resource management and adaptation planning increase the resilience of communities and the natural environment to the short, medium, and long-term effects of climate change.</i></p>  | Support         | Retain the policy.  | CDC supports this objective and notes that the draft Wairarapa Combined District Plan will give effect to this.  |
| <p><b>Objective CC.7</b></p> <p><i>People and businesses understand what climate change means for their future and are actively involved in planning and implementing appropriate mitigation and adaptation responses.</i></p>  | Support         | Ensure that funding is allocated to the implementation of this objective.   | CDC supports a partnership approach with the community in mitigating and adapting to climate change. Funding will need to be allocated for this.   |
| <b>Chapter 3.4: Fresh water (including public access)</b>   |                 |   |  |
| General comment   | Oppose          | Use the Freshwater Planning Process for the provisions in this chapter only, where freshwater is the <u>primary issue</u> , and use | As stated above, CDC considers that it is inappropriate to apply the Freshwater Planning Process to provisions where freshwater is not the primary issue. CDC therefore requests that the FPP is only used for provisions in this chapter, and all other   |



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|  |                 | the Schedule 1 process for all remaining provisions.  | Plan Change 1 amendments are addressed via the Schedule 1 process.  |
| Statements of Rangitāne o Wairarapa and Kahungunu ki Wairarapa | Support         | Provide better linkages between these statements and the rest of the RPS.   | CDC supports the inclusion of these statements, but it is unclear what purpose they serve in the RPS – better linkages with other objectives or policies would be useful to better understand how to give effect to the statements.   |
| <b>Chapter 3.9: Regional form, design and function</b>         |                 |   |   |
| Introduction   | Support in part | Add some introductory text that recognises ‘urban areas’, not just ‘urban environments’, and describes their role in the regional form, design and function of the Wellington region. | The chapter introduction refers extensively to urban environments, as defined in the NPS-UD. However there is no mention of other urban areas that do not meet the definition of urban environments – for example, Carterton. Some introductory text that recognises other urban areas would be useful. |
| General comment  | Support in part | Add an objective that provides direction for urban areas – those areas that are within urban zones, but not part of ‘urban environments’.   | CDC seeks an objective that specifically provides for urban areas which are not urban environments. This would support Policy 31 in particular.   |
| <b>Chapter 4.1: Regulatory policies</b>                        |                 |   |   |
| General comment  | Oppose          | Re-label policies so that numbering is continuous, or group the CC, FW and IE policies together.  | CDC considers that the approach of scattering climate change, indigenous ecosystems and freshwater policies throughout Chapter 4.1 makes the plan very difficult to use.  |

| Provision   | Support/<br>oppose | Decision sought  | Submission/Reasons  |
|---|--------------------|--|---|
| <p><b>Policy CC.1: Reducing greenhouse gas emissions associated with transport infrastructure – district and regional plans</b></p> <p><i>District and regional plans shall include objectives, policies, rules and/or methods to require that all new and altered transport infrastructure is designed, constructed, and operated in a way that contribute to reducing greenhouse gas emissions by:</i></p> <p><i>(a) Optimising overall transport demand;</i></p> <p><i>(b) Maximising mode shift from private vehicles to public transport or active modes; and</i></p> <p><i>(c) Supporting the move towards low and zero-carbon modes.</i></p> <p><u>Explanation</u></p> <p><i>This policy requires transport infrastructure planning (including design, construction and operation) to consider and choose solutions that will contribute to reducing greenhouse gas emissions.</i></p> | Support in part    | Amend the policy so that it does not apply to small-scale transport infrastructure alterations and does not apply outside urban areas. | <p>While CDC supports the intent of this policy, applying the requirements in (a)-(c) to all new <u>and altered</u> transport infrastructure does not allow for the scale or type of the alterations to be considered.</p> <p>For example, an alteration to transport infrastructure could comprise a new roundabout, or creation of a heavy vehicle bypass – there are many types of alterations where consideration of these matters would not be appropriate, either because the alteration is minor in nature, or because it provides greater efficiency for the wider transport network – but not necessarily for zero- or low-carbon modes. While there might be flow-on effects (e.g. a heavy vehicle bypass might make other urban streets more attractive for active modes), these would not necessarily meet the criteria in (b) and (c).</p> <p>CDC also requests that the policy is amended so that it applies in urban areas only.</p> |
| <p><b>Policy CC.3: Enabling a shift to low and zero-carbon emission transport – district plans</b></p> <p><i>By 30 June 2025, district plans shall include objectives, policies, rules and methods that enable infrastructure that supports the uptake of zero and low-carbon multi modal</i></p>   | Support            | Retain this policy.  | CDC supports this policy and particularly the ‘enable’ approach to encourage zero- and low-carbon transport infrastructure.   |

| Provision   | Support/<br>oppose | Decision sought  | Submission/Reasons   |
|---|--------------------|--|--|
| <p><i>transport that contribute to reducing greenhouse gas emissions.</i></p> <p><u>Explanation</u></p> <p><i>District plans must provide a supportive planning framework (for example, permitted activity status) for zero and low-carbon multi modal transport infrastructure, such as public transport infrastructure, cycleways and public EV charging network.</i></p>   |                    |  |  |
| <p><b>Policy CC.4: Climate resilient urban areas – district and regional plans</b></p> <p><i>District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.</i></p> <p><u>Explanation</u></p> <p><i>Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. For the purposes of this policy, climate-resilient urban areas mean urban environments that have the ability to withstand:</i></p> <ul style="list-style-type: none"> <li><i>• Increased temperatures and urban heat island</i></li> </ul> | Support in part    | <p>Amend as follows:</p> <p><b>Policy CC.4: Climate resilient urban areas – district and regional plans</b></p> <p><i>District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.</i></p> <p><u>Explanation</u></p> <p><i>Policy CC.4 directs regional and district plans include relevant provisions to provide for climate resilient urban areas. For the purposes of this policy, climate-resilient</i></p> | <p>CDC supports the intent of this policy but considers that referring to both ‘urban areas’ and ‘urban environments’ makes the application of the policy ambiguous. Amendments are suggested so that it refers to ‘urban areas’ only.</p> |

| Provision  | Support/<br>oppose | Decision sought   | Submission/Reasons   |
|--|--------------------|---|--|
| <ul style="list-style-type: none"> <li>• Increased intensity of rainfall and urban flooding</li> <li>• Droughts and urban water scarcity and security</li> <li>• Increased intensity of wind, cold spells, landslides, fire, and air pollution</li> </ul> <p>The policy is directly associated with Policy CC.14 which provides further direction on actions and initiatives to provide for climate resilient urban areas. It is noted that other policies of this RPS also provide for actions and initiatives to deliver climate resilient urban areas, including Policy FW.3.</p> |                    | <p>urban areas mean urban environments that have the ability to withstand:</p> <ul style="list-style-type: none"> <li>• Increased temperatures and urban heat island</li> <li>• Increased intensity of rainfall and urban flooding</li> <li>• Droughts and urban water scarcity and security</li> <li>• Increased intensity of wind, cold spells, landslides, fire, and air pollution</li> </ul> <p>The policy is directly associated with Policy CC.14 which provides further direction on actions and initiatives to provide for climate resilient urban areas. It is noted that other policies of this RPS also provide for actions and initiatives to deliver climate resilient urban areas, including Policy FW.3.</p> |  |
| <p><b>Policy CC.5: Avoid increases in agricultural greenhouse gas emissions – regional plan</b></p> <p>Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in gross greenhouse gas emissions from agriculture.</p>   | Oppose             | Delete the policy.  | While no methods are included, and the policy applies to regional plans only, this policy appears to set the initial framework for RMA plans targeting agricultural emissions. CDC is concerned with the implications of this, and with the interaction or conflict it might have with other agricultural emission reduction measures. |

| Provision   | Support/<br>oppose | Decision sought  | Submission/Reasons   |
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| <p><u>Explanation</u></p> <p><i>As agriculture is the second largest emitter of greenhouse gases in the Wellington Region, contributing 34 percent of the region’s greenhouse gas emissions, reducing emissions from the agricultural sector is critical to contribute to achieving Objective CC.3. While central government is taking the lead on the policy approach to reduce agricultural greenhouse gas emissions through the use of a pricing mechanism (the Emissions Trading Scheme), this policy sets a minimum expectation that there should be no increase in agricultural greenhouse gas emissions in the Wellington Region.</i></p> <p><i>As of 30 November 2022, regional councils are able to make rules to control the discharge of greenhouse gases having regard to the effects on climate change. A plan change process will determine the way in which Policy CC.5 is given effect to and will need to consider issues such as equity and the relationship with the national pricing approach for agricultural emissions.</i></p> |                    |  | <p>Land use management largely sits with district plans, and therefore it is unclear why this only applies to regional plans, and what flow-on effects there might be for district plans.</p> <p>CDC wishes to understand how this reduction aligns with Government policy in the area. It is unclear how fair and reasonable reductions should be calculated and consistently applied in consenting.</p> <p>CDC requests that this policy is deleted, and the matter reconsidered as part of any future plan change process if that is appropriate.</p> |
| <p><b>Policy CC.6: Increasing regional forest cover and avoiding plantation forestry on highly erodible land – regional plans</b></p> <p><i>Regional plans shall include objectives, policies, rules and/or methods that support an increase in the area of</i></p>   | Support in part    | <p>Amend the policy so that permanent forest is not encouraged on highly productive land.</p> <p>Provide a more supportive policy framework for this when a variation is prepared to respond to the NPS-HPL.</p> | <p>CDC supports this policy, and particularly that it requires the avoidance of plantation forestry on highly erodible land.</p> <p>CDC does have concerns that the Wairarapa will be expected to provide a greater proportion of permanent forest cover than other areas because it has larger areas of rural land. When the driver for</p>   |

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| <p><i>permanent forest in the region to contribute to achieving net-zero greenhouse gas emissions by 2050, while:</i></p> <p><i>(a) promoting and incentivising the planting or regeneration of permanent indigenous forest over exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached, and</i></p> <p><i>(b) avoiding plantation forestry on highly erodible land, particularly in catchments where water quality targets for sediment are not reached.</i></p> <p><u>Explanation</u></p> <p><i>This policy recognises that, while there is a need for increased forest extent across the Wellington Region to help achieve net zero emissions by 2050, offsetting through carbon sequestration is only a short-term solution and that there are significant risks associated with unfettered afforestation across the region. The policy directs regional plans to develop provisions that will support “right tree-right place”, seeking to ensure that an increase in forest extent for its sequestration benefits will be implemented in a way that maximises the co-benefits for indigenous biodiversity and aquatic ecosystem health, and provide for social and economic wellbeing as directed by Objective CC.5.</i></p> |                    |                 | <p>increased afforestation is achieving net zero carbon emissions, it appears inequitable that the Wairarapa might suffer from greater afforestation when there is a lack of emission reduction in other areas. CDC seeks that the policy reflect that offset should occur in the area where emissions are generated.</p> <p>While permanent forest, and particularly indigenous permanent forest, has significant benefits, it is not productive and therefore the Wairarapa may bear an unreasonable burden from this policy. CDC requests that the policy is amended to reflect that permanent forest should not be planted on productive land.</p> |

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|--|--------------------|--|---|
| <p><i>Clause (b) responds to the high risk of harvesting forest in areas that are highly erodible and in catchments where waterways already have high sediment loads. The National Environmental Standards for Plantation Forestry enables regional plans to regulate plantation forestry for the purpose of protecting freshwater quality.</i></p>  |                    |  |   |
| <p><b>Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting – district and regional plans</b></p> <p><i>District and regional plans shall include objectives, policies, rules and/or methods to prioritise reducing greenhouse gas emissions in the first instance rather than applying offsetting, and to identify the type and scale of the activities to which this policy should apply.</i></p> <p><u>Explanation</u></p> <p><i>This policy recognises the importance of reducing gross greenhouse gas emissions as the first priority, and only using carbon removals to offset emissions from hard-to-abate sectors. Relying heavily on offsetting will delay people taking actions that reduce gross emissions, lead to higher cumulative emissions and push the burden of addressing gross emissions onto future generations.</i></p> | Support            | Retain this policy.  | <p>CDC supports this policy.</p> <p>It goes some way to addressing CDC’s concerns that the Wairarapa will be expected to act as a ‘carbon sink’ for the Wellington region via extensive afforestation.</p> <p>This policy makes it clear that afforestation should not be a primary method for achieving net-zero emissions. As stated above, any offsetting should be applied equitably across the region and should occur in the local area in which emissions are generated.</p> |
| <p><b>Policy 7: Recognising the benefits from renewable energy and regionally significant infrastructure – district and regional plans</b></p>   | Support in part    | Amend the explanation so that it is clear what is meant by ‘low and zero carbon regionally significant infrastructure’; or | While CDC supports the intent of this provision, the references to ‘low or zero carbon’ activities do not make sense here, and there are other terms that can   |

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| <p><i>District and regional plans shall include policies and/or methods that recognise:</i></p> <p><i>(a) the social, economic, cultural and environmental benefits of regionally significant infrastructure, <u>and in particular low and zero carbon regionally significant infrastructure</u> including:</i></p> <p><i>(i) people and goods can travel to, from and around the region efficiently and safely <u>and in ways that support transitioning to low or zero carbon multi modal travel modes</u>;</i></p> <p><i>(ii) public health and safety is maintained through the provision of essential services: - supply of potable water, the collection and transfer of sewage and stormwater, and the provision of emergency services;</i></p> <p><i>(iii) people have access to energy, <u>and preferably low or zero carbon energy</u>, so as to meet their needs; and</i></p> <p><i>(iv) people have access to telecommunication services.</i></p> <p><i>(b) the social, economic, cultural and environmental benefits of energy generated from renewable energy resources including:</i></p> <p><i>(i) security of supply and diversification of our energy sources;</i></p> |                    | <p>alternatively, remove the proposed additions to (a).</p> <p>Amend (a)(i) as follows:</p> <p><i>(i) people and goods can travel to, from and around the region efficiently and safely <u>and in ways that support transitioning to public transport, active transport or low or zero carbon multi modal travel modes</u>;</i></p> <p>Amend (a)(iii) as follows:</p> <p><i>(iii) people have access to energy, <u>and preferably renewable low or zero carbon energy</u>, so as to meet their needs; and</i></p> | <p>more effectively convey the requirements of this policy.</p> <p>It is unclear what 'low and zero carbon regionally significant infrastructure' might include, and how this might be assessed.</p> <p>Replacing 'Low or zero carbon energy' with 'renewable energy' provides greater clarity (noting that the vast majority of residents access their energy from the National Grid or non-local sources of gas and therefore this clause has limited effect).</p> |



| Provision   | Support/<br>oppose | Decision sought    | Submission/Reasons  |
|---|--------------------|--------------------|---|
| <p><i>(ii) reducing dependency on imported energy resources;<br/>and</i></p> <p><i>(iii) reducing greenhouse gas emissions.</i></p> <p><u>Explanation</u></p> <p><i>Notwithstanding that renewable energy generation and regionally significant infrastructure can have adverse effects on the surrounding environment and community, Policy 7 recognises that these activities can provide benefits both within and outside the region, in particular if regionally significant infrastructure is a low or zero carbon development.</i></p>  |                    |                    |   |
| <p><b>Policy 11: Promoting and enabling energy efficient design and small scale renewable energy generation – district plans</b></p> <p><i>District plans shall include policies and/or rules and other methods that:</i></p> <p><i>(a) promote energy efficient design and the <u>energy efficient alterations to existing buildings</u>;</i></p> <p><i>(b) <u>enable the installation and use of domestic scale (up to 20 kW) and small scale distributed renewable energy generation (up to 100 kW); and provide for energy efficient alterations to existing buildings</u>;</i></p> | Support            | Retain the policy. | CDC supports this policy and notes that the draft Wairarapa Combined District Plan uses a different approach to defining small- and community-scale renewable electricity generation. The WCDP approach generally exceeds what is required by these amendments. |

| Provision  | Support/<br>oppose | Decision sought   | Submission/Reasons  |
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| <p><u>Explanation</u></p> <p><u>Policy 11 promotes energy efficient design, energy efficient alterations to existing buildings, and enables installation of domestic scale and renewable energy generation (up to 100kW).</u></p> <p><u>Energy efficient design and alteration to existing buildings, can reduce total energy costs (i.e., heating) and reliance on non-renewable energy supply.</u></p> <p><u>Small scale distributed renewable electricity generation means renewable electricity generation for the purpose of using electricity on a particular site, or supplying an immediate community, or connecting into the distribution network. (from NPS-REG 2011).</u></p> |                    |   |   |
| <p><b>Policy 15: <u>Managing Minimising the effects of earthworks and vegetation disturbance – district and regional plans</u></b></p> <p><u>Regional and district plans shall include policies, rules and/or methods that control earthworks and vegetation disturbance to minimise the extent necessary to achieve the target attribute states for water bodies and freshwater ecosystems including the effects of these activities on the life-supporting capacity of soils, and to provide for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.</u></p>   | Oppose             | Remove reference to district plans from this policy, so that the requirements only apply to regional plans. | <p>While CDC supports a more holistic consideration of the effects of earthworks and vegetation clearance, it is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m<sup>2</sup>).</p> <p>It is unclear how policies, rules and methods, and subsequent assessment of land use consent applications, should be applied in a district plan context. CDC does not have the capacity to undertake an assessment of the matters described in this policy as they do not relate to core territorial</p> |

| Provision  | Support/<br>oppose | Decision sought   | Submission/Reasons   |
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| <p><i>(a) erosion; and</i></p> <p><i>(b) silt and sediment runoff into water, or onto land that may enter water, aquatic</i></p> <p><i>ecosystem health is safeguarded.</i></p> <p><u>Explanation</u></p> <p>...</p>   |                    |   | <p>authority functions, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks.</p> <p>Policies, rules and methods addressing these matters are more appropriate in a regional plan and therefore CDC requests that references to district plans are removed from this policy.</p>   |
| <p><b>Policy FW.2: Reducing water demand – district plans</b></p> <p><i>District plans shall include policies, rules and/or methods to reduce demand of water from registered water suppliers and users, including where practicable:</i></p> <p><i>(a) provisions improving the efficiency of the end use of water on a per capita basis for new developments; and</i></p> <p><i>(b) provisions requiring alternate water supplies for non-potable use in new developments.</i></p> <p><u>Explanation</u></p> <p><i>Policy FW.2 requires district plans to address the reduction of demand in municipal water supplies.</i></p> | Support in part    | Delete point (a) from Policy FW.2.  | <p>CDC generally supports this policy.</p> <p>However, CDC questions the efficiency and effectiveness of point (a), particularly a regulatory approach in District Plans. We understand the intent of this point is to require the installation of water efficient appliances, showers and toilets. However, the costs of compliance and enforcement would be high, in particular to ensuring ongoing compliance.</p> <p>CDC considers other (non-regulatory) methods such as water meters and education on efficient use of water are more effective and efficient.</p> |
| <p><b>Policy FW.3: Urban development effects on freshwater and the coastal marine area – district plans</b></p>  | Oppose             | Amend the policy so that it addresses only those matters addressed in section 3.5(4) of the NPS-FM. | <p>CDC opposes this policy, as it goes far beyond what is required by the NPS-FM. CDC does not have the in-house capability to provide an assessment against these matters, and considers that most of these</p>   |

| Provision  | Support/<br>oppose | Decision sought | Submission/Reasons  |
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| <p><i>District plans shall include objectives, policies, and methods including rules, that give effect to Te Mana o te Wai and section 3.5(4) of the NPS-FM, and in doing so must:</i></p> <p><i>(a) Partner with mana whenua / tangata whenua in the preparation of district plans;</i></p> <p><i>(b) Protect and enhance Māori freshwater values, including mahinga kai;</i></p> <p><i>(c) Provide for mana whenua / tangata whenua and their relationship with their culture, land, water, wāhi tapu and other taonga;</i></p> <p><i>(d) Incorporate the use of mātauranga Māori to ensure the effects of urban development are considered appropriately;</i></p> <p><i>(e) Adopt an integrated approach, ki uta ki tai, that recognises the interconnectedness of the whole environment to determine the location and form of urban development;</i></p> <p><i>(f) Integrate planning and design of stormwater management to achieve multiple improved outcomes – amenity values, recreational, cultural, ecological, climate, vegetation retention;</i></p> |                    |                 | <p>matters sit more comfortably within the regional council functions.</p> <p>CDC requests that the policy is amended so that it is consistent with section 3.5(4) of the NPS-FM, but does not go beyond the ambit of that provision.</p> |

| Provision   | Support/<br>oppose | Decision sought | Submission/Reasons |
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| <p><i>(g) Consider the effects on freshwater and the coastal marine area of subdivision, use and development of land;</i></p> <p><i>(h) Consider the use and development of land in relation to target attribute states and any limits set in a regional plan;</i></p> <p><i>(i) Require that Water Sensitive Urban Design principles and methods are applied during consideration of subdivision, the extent of impervious surfaces and in the control of stormwater infrastructure;</i></p> <p><i>(j) Require that urban development is located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours;</i></p> <p><i>(k) Require that urban development is located and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</i></p> <p><i>(l) Require riparian buffers for all waterbodies and avoid piping of rivers;</i></p> <p><i>(m) Require hydrological controls to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;</i></p> <p><i>(n) Require efficient use of water;</i></p> |                    |                 |                    |

| Provision  | Support/<br>oppose | Decision sought     | Submission/Reasons   |
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| <p>(o) Manage land use and development in a way that will minimise the generation of contaminants, including building materials, and the extent of impervious surfaces;</p> <p>(p) Consider daylighting of streams, where practicable; and</p> <p>(q) Consider the effects of land use and development on drinking water sources.</p> <p><u>Explanation</u></p> <p>Policy FW.3 requires district plans to manage the effects of urban development on freshwater and the coastal marine area.</p>   |                    |                     |  |
| <p><b>Policy FW.4: Financial contributions for urban development – district plans</b></p> <p><i>District plans shall include policies and rules that require financial contributions to be applied to subdivision and development as a condition of the resource consent where off site stormwater quality and quantity treatment is required, as set out in a Stormwater Management Plan (required as a condition of a network discharge consent for that catchment). The district plan policy shall outline how a fair share of the cost is determined, and the nature of the contribution. A financial contribution will not be required where a development contribution (as required by a Development Contribution Policy under the Local</i></p> | Oppose             | Delete this policy. | CDC opposes this policy and considers that the RPS should not include policies that dictate requirements for particular financial contributions in district plans. The appropriate mechanism for GWRC to suggest such a policy is via the Schedule 1 process for the Wairarapa Combined District Plan. |

| Provision   | Support/<br>oppose | Decision sought                            | Submission/Reasons  |
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| <p><i>Government Act) has been collected from the same development for the same purpose.</i></p> <p><i>Note: financial contributions cannot be imposed against Minister of Education or Minister of Defence</i></p> <p><u>Explanation</u></p> <p><i>Policy FW.4 requires financial contributions, or alternatively development contributions to be collected for the construction of catchment scale stormwater solutions, so that urban new urban development pays their fair share.</i></p> |                    |  |   |
| <p><b>Policy 23: Identifying indigenous ecosystems and habitats with significant indigenous biodiversity values – district and regional plans</b></p> <p><u>By 30 June 2025, D</u><i>istrict and regional plans shall identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values; these ecosystems and habitats will be considered significant if they meet one or more of the following criteria:</i></p> <p>...</p>                           | Oppose             | Delete 'By 30 June 2025' from this policy. | CDC opposes the amendment to this policy requiring that indigenous ecosystems and habitats are identified by June 2025. This policy appears to be pre-empting the forthcoming National Policy Statement for Indigenous Biodiversity (NPS-IB). CDC considers that any amendments giving effect to the NPS-IB should be addressed in a separate plan variation process. |
| <p><b>Policy 24</b></p> <p><u>By 30 June 2025, D</u><i>istrict and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous</i></p>   | Oppose             | Revert to original text of Policy 24.      | As per submission on Policy 23, CDC opposes the amendments to require that SNAs are identified by June 2025.  |

| Provision   | Support/<br>oppose | Decision sought | Submission/Reasons  |
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| <p>biodiversity values from inappropriate subdivision, use and development.</p> <p><u>Where the policies and/or rules in district and regional plans enable the use of biodiversity offsetting or biodiversity compensation for an ecosystem or habitat with significant indigenous biodiversity values, they shall:</u></p> <p><u>(a) not provide for biodiversity offsetting:</u></p> <p>(i) <u>where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset; or</u></p> <p>(ii) <u>when an activity is anticipated to causes residual adverse effects on an area after an offset has been implemented if the ecosystem or species is threatened or the ecosystem is naturally uncommon;</u></p> <p><u>(b) not provide for biodiversity compensation where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally uncommon;</u></p> <p><u>(c) ecosystems and species known to meet any of the criteria in (a) or (b) are listed in Appendix 1A (Limits to biodiversity offsetting and biodiversity compensation);</u></p> |                    |                 | <p>CDC also considers that, due to the breadth of ecosystems and habitats included in Appendix 1A, the revised policy will effectively provide for no offsetting or compensation opportunities across many parts of the region.</p> |



| Provision   | Support/<br>oppose | Decision sought     | Submission/Reasons  |
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| <p><u>(d) require that the outcome sought from the use of biodiversity offsetting is at least a 10 percent net biodiversity gain, or from biodiversity compensation is at least a 10 percent net biodiversity benefit.</u></p>  |                    |                     |   |
| <p><b>Policy 30: Maintaining and enhancing the viability and vibrancy of regionally and locally significant centres – district plans</b></p> <p>...</p>   | Support            | Retain this policy. | CDC supports this policy and recognition of Carterton as a locally significant centre.  |
| <p><b>Policy 31: Identifying and enabling a range of building heights and density promoting higher density and mixed use development – district plans</b></p> <p><i>District plans shall include policies, rules and/or methods that identify and enable a range of different building heights and density within urban areas where it contributes to maintaining, establishing or improving the qualities and characteristics of well-functioning urban environments, including as a minimum:</i></p> <p><i>(a) For any tier 1 territorial authority, identify areas for high density development within:</i></p> <p><i>(i) City centre zones and metropolitan centre zones; and</i></p> <p><i>(ii) any other locations, where there is with good access to:</i></p> | Support            | Retain this policy  | CDC supports this policy. The approach outlined in (c) is appropriate in the Carterton context and will be reflected in the draft Wairarapa Combined District Plan. |

| Provision  | Support/<br>oppose | Decision sought | Submission/Reasons |
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| <p>1. existing and planned rapid transit;</p> <p>2. edge of city centre zones and metropolitan centre zones; and/or</p> <p>3. areas with a range of commercial activities and community services.</p> <p>(b) For any tier 1 territorial authority, identify areas for medium density residential development within any relevant residential zone.</p> <p>(c) For any other territorial authority not identified as a tier 1 territorial authority, identify areas for greater building height and density where:</p> <p>(i) there is good access to existing and planned active and public transport to a range of commercial activities and community services; and/or</p> <p>(ii) there is relative demand for housing and business use in that location.</p> <p>...</p> <p><u>Explanation</u></p> <p>Policy 31 requires identification of areas suitable for intensification, and enables intensification in these areas, giving effect to Policy 3 of the National Policy Statement</p> |                    |                 |                    |

| Provision   | Support/<br>oppose | Decision sought     | Submission/Reasons   |
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| <p><i>on Urban Development 2020. Policy 31 also enables greater building height and densities to be provided for in non-tier 1 territorial authorities which includes Masterton being a tier 3 territorial authority as well as Carterton and South Wairarapa. Providing for this development is consistent with Policy 5 of the National Policy Statement on Urban Development 2020.</i></p>   |                    |                     |  |
| <p><b>Policy 32: Identifying and protecting key industrial-based employment locations – district plans</b></p> <p><i>District plans should <u>shall</u> include policies, rules and/or methods that identify and protect key industrial-based employment locations where they <u>contribute to the qualities and characteristics of well-functioning urban environments by: maintain and enhance compact, well designed and sustainable regional form</u></i></p> <p><i><u>(a) Recognising the importance of industrial based activities and the employment opportunities they provide.</u></i></p> <p><i><u>(b) Identifying specific locations and applying zoning suitable for accommodating industrial activities and their reasonable needs and effects including supporting or ancillary activities.</u></i></p> <p><i><u>(c) Identifying a range of land sizes and locations suitable for different industrial activities, and their operational needs including land-extensive activities,</u></i></p> | Support            | Retain this policy. | CDC supports the approach in this policy, of ensuring that industrial land is protected for industrial use. The draft Wairarapa Combined District Plan is consistent with this policy. |

| Provision   | Support/<br>oppose | Decision sought  | Submission/Reasons  |
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| <p><u>(d) Managing the establishment of non-industrial activities, in industrial zones, by avoiding activities likely to result in reverse sensitivity effects on industrial activities, or likely to result in an inefficient use of industrial zoned land or infrastructure.</u></p> <p><u>Explanation</u></p> <p><u>Policy 32 directs that district plans must protect key industrial based employment opportunities where they contribute to the qualities and characteristics of well-functioning urban environments. Further direction is provided on how this is achieved through clauses (a) – (d). Key industrial employment locations are important as they provide for economic growth, employment opportunities and development.</u></p> <p><u>Management of other land use activities where significant historical investment or existing infrastructure may be adversely affected by competing or conflicting activities.</u></p> |                    |  |   |
| <p><b>Policy IM.2: Equity and inclusiveness – consideration</b></p> <p><i>When considering an application for a notified resource consent, notice of requirement, or a change, variation or review of a regional and district plan particular regard shall be given to achieving the objectives and policy outcomes of this RPS in an equitable and inclusive way, by:</i></p>  | Oppose             | Further guidance provided by GWRC on how this should be given effect to. | CDC seeks further guidance on how this should be implemented in an RMA framework. |

| Provision  | Support/<br>oppose | Decision sought | Submission/Reasons                               |
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| <p><i>(a) avoiding compounding historic grievances with iwi/Māori; and</i></p> <p><i>(b) not exacerbating existing inequities, in particular but not limited to, access to public transport, amenities and housing; and</i></p> <p><i>(c) not exacerbating environmental issues; and</i></p> <p><i>(d) not increasing the burden on future generations.</i></p> <p><u>Explanation</u></p> <p><i>This policy requires that equity and inclusiveness are at the forefront of resource management and decision making to prevent any increase in existing inequities, to ensure intergenerational equity, and to improve the overall wellbeing of people and communities.</i></p> |                    |                 |  |
| <p><b>Policy CC.9: Reducing greenhouse gas emissions associated with transport infrastructure – consideration</b></p> <p><i>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use and development have been planned to optimise overall transport demand, maximising mode shift from private vehicles to public transport or active modes, in a way that contributes to reducing greenhouse gas emissions.</i></p>  | Oppose             |                 | Links with previous policy – same comments apply |

| Provision  | Support/<br>oppose | Decision sought   | Submission/Reasons  |
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| <p><u>Explanation</u></p> <p><i>This policy requires regional and district councils to consider whether subdivision, use and development proposals have fully considered all options to reduce greenhouse gas emissions as far as practicable.</i></p>   |                    |   |   |
| <p><b>Policy CC.13: Managing agricultural gross greenhouse gas emissions – consideration</b></p> <p><i>When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to:</i></p> <p><i>(a) reducing gross greenhouse gas emissions as a priority where practicable, and</i></p> <p><i>(b) where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and</i></p> <p><i>(c) avoiding any increase in gross greenhouse gas emissions.</i></p> <p><u>Explanation</u></p> <p><i>As agriculture is the second largest emitter of GHG in the region, contributing 34 percent of the region’s GHG emissions, reducing emissions from this sector is critical to contribute to achieving Objective CC.3. As of 30 November 2022, consent authorities may have regard to the effects</i></p> | Oppose             | Amend the policy so that it is clear that these considerations can only apply to discharge permits and coastal permits. | The explanation notes that these matters can only be considered in a discharge permit or coastal permit. Therefore, the application of this policy is unclear. If the scope for considering these matters is limited, that should be made clear in the chapeau of the policy. |

| Provision   | Support/<br>oppose | Decision sought  | Submission/Reasons  |
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| <p><i>of discharges into air of greenhouse gases on climate change in considering an application for a discharge permit or coastal permit. Where resource consent is required in association with a change in land use intensity or type of agricultural land use, the policy requires a hierarchy of effort, seeking to reduce gross greenhouse gas emissions in the first instance, followed by achieving a net reduction, with a minimum expectation that any increase in gross emissions is avoided.</i></p>  |                    |  |   |
| <p><b>Policy CC.14: Climate-resilient urban areas – consideration</b></p> <p><i>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, provide for actions and initiatives, particularly the use of nature-based solutions, that contribute to climate resilient urban areas, including:</i></p> <p><i>(a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050,</i></p> <p><i>(b) the application of water sensitive urban design principles to integrate natural water systems into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality,</i></p> | Support in part    | <p>Amend the policy as follows:</p> <p><b>Policy CC.14: Climate-resilient urban areas – consideration</b></p> <p><i>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, provide for actions and initiatives, particularly the use of nature-based solutions, that contribute to climate resilient urban areas, including:</i></p> <p>...</p> <p><i>(f) buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.</i></p> | <p>CDC supports this policy but notes that (f) is better addressed via the Building Act framework, rather than through RMA processes. Request deletion of clause (f).</p> |

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| <p><i>(c) capturing, storing, and recycling water at a community-scale (for example, by requiring rain tanks, and setting targets for urban roof area rainwater collection),</i></p> <p><i>(d) protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural hazards and the effects of climate change,</i></p> <p><i>(e) providing for efficient use of water and energy in buildings and infrastructure, and</i></p> <p><i>(f) buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.</i></p> <p><u>Explanation</u></p> <p><i>Climate change, combined with population growth and housing intensification, is increasingly challenging the resilience and well-being of urban communities and natural ecosystems, with increasing exposure to natural hazards, and increasing pressure on water supply, wastewater and stormwater infrastructure, and the health of natural ecosystems.</i></p> <p><i>This policy identifies the key attributes required to develop climate-resilience in urban areas and requires district and regional councils to take all opportunities to provide for actions and initiatives, particularly nature-based solutions,</i></p> |                    |                 |                    |



| Provision   | Support/ oppose | Decision sought  | Submission/Reasons  |
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| <p>that will prepare our urban communities for the changes to come.</p>   |                 |  |   |
| <p><b>Policy 41: <u>Controlling Minimising the effects of earthworks and vegetation disturbance – consideration</u></b></p> <p><i>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to controlling earthworks and vegetation disturbance <u>by</u> to minimise:</i></p> <p><i>(a) erosion; and</i></p> <p><i>(a) <u>considering whether the activity will achieve environmental outcomes and target attribute states; silt and sediment runoff into water, or onto or into land that may enter water, so that healthy aquatic ecosystems are sustained; and</u></i></p> <p><i>(b) <u>avoiding discharges to water bodies, and to land where it may enter a waterbody, where limits for suspended sediment are not met.</u></i></p> <p><u>Explanation</u></p> <p><i>An area of overlapping jurisdiction between Wellington Regional Council and district and city councils is the ability to control earthworks and vegetation disturbance, including clearance. Large scale earthworks and vegetation disturbance on erosion prone land in rural</i></p> | <p>Oppose</p>   | <p>Remove reference to district plans from this policy, so that the requirements only apply to regional plans.</p> | <p>While CDC supports a more holistic consideration of the effects of earthworks and vegetation clearance, it is inappropriate to apply this assessment to earthworks and vegetation clearance that are undertaken at a scale lower than that controlled by the regional plan (i.e. 3000m<sup>2</sup>).</p> <p>It is unclear how policies, rules and methods, and subsequent assessment of land use consent applications, should be applied in a district plan context. CDC does not have the capacity to undertake an assessment of the matters described in this policy, particularly as they relate to freshwater, and considers that it is excessive for smaller-scale earthworks.</p> <p>Policies, rules and methods addressing these matters are more appropriate in a regional plan and therefore CDC requests that references to district plans are removed from this policy.</p> |

| Provision  | Support/<br>oppose | Decision sought    | Submission/Reasons   |
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| <p><i>areas and many small scale earthworks in urban areas – such as driveways and retaining walls – can cumulatively contribute large amounts of silt and sediment to stormwater and water bodies. This policy is intended to minimise erosion and silt and sedimentation effects associated with these activities.</i></p>   |                    |                    |  |
| <p><b>Policy FW.5: Water supply planning for climate change and urban development – consideration</b></p> <p><i>When considering a change, variation or review of a regional or district plan particular regard shall be given to:</i></p> <p><i>(a) climate change impacts on water supply, including water availability and demand;</i></p> <p><i>(b) demand from future population projections;</i></p> <p><i>(c) development of future water sources, storage, treatment and reticulation; and</i></p> <p><i>(d) protection of existing and future water sources.</i></p> <p><u>Explanation</u></p> <p><i>Policy FW.5 requires water supply planning to adequately considered including the impacts of climate change and new urban development.</i></p> | Support            | Retain the policy. | CDC supports this policy.  |
| <p><b>Policy 51: Minimising the risks and consequences of natural hazards – consideration</b></p>  | Support            | Retain the policy. | CDC supports the amendments to this policy, noting that the draft Wairarapa Combined District Plan has |

| Provision  | Support/ oppose | Decision sought  | Submission/Reasons   |
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| ...  |                 |  | been developed in a way that will give effect to this policy.  |
| <b>Policy 55: <i>Providing for appropriate urban expansion Maintaining a compact, well designed and sustainable regional form – consideration</i></b><br>...   | Support         | Retain the policy.   | CDC supports the amendments to this policy.  |
| <b>Policy 56: <i>Managing development in rural areas – consideration</i></b><br>...  | Support         | Retain the policy.   | CDC supports the amendments to this policy.  |
| <b>Policy 57: <i>Integrating land use and transportation – consideration</i></b><br><br><i>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, <u>require land use and transport planning within the Wellington Region is integrated in a way which:</u></i><br><br><i><u>(a) supports a safe, reliable, inclusive and efficient transport network;</u></i><br><br><i><u>(b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity;</u></i> | Support in part | Amend the policy as follows:<br><br><i><u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, require land use and transport planning within the Wellington Region is integrated in a way which have particular regard to the way in which land use and transport planning is integrated within the Wellington Region, so that it:</u></i><br><br><i><u>(a) supports a safe, reliable, inclusive and efficient transport network;</u></i> | CDC supports integrated development in the Eastern Growth corridor – Hutt to Masterton. However, CDC does not consider that this policy in its proposed form is appropriate in Carterton. The public transport network in the Wairarapa is limited, and as a predominantly rural area, there are practical limits to the way in which public transport can be utilised. While active modes can be encouraged, and the rail network provides a linkage to other towns on the Wairarapa line, the heavy emphasis on public transport networks is not appropriate in the Wairarapa context.<br><br>CDC is concerned that the policy <u>requires</u> that land use and transport planning is integrated for new development and would instead support the policy |

| Provision  | Support/<br>oppose | Decision sought  | Submission/Reasons  |
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| <p><u>(c) minimises private vehicle travel and trip length while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes;</u></p> <p><u>(d) encourages an increase in the amount of travel made by public transport and active modes;</u></p> <p><u>(e) provides for well-connected, safe and accessible multi modal transport networks while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical;</u></p> <p><u>(f) supports and enables the growth corridors in the Wellington Region, including:</u></p> <ul style="list-style-type: none"> <li><u>(i) Western Growth Corridor – Tawa to Levin;</u></li> <li><u>(ii) Eastern Growth Corridor – Hutt to Masterton;</u></li> <li><u>(iii) Let’s Get Wellington Moving Growth Corridor.</u></li> </ul> |                    | <p><u>(b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity;</u></p> <p><u>(c) minimises private vehicle travel and trip length, where practical, while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes;</u></p> <p><u>(d) encourages an increase in the amount of travel made by public transport and active modes;</u></p> <p><u>(e) provides for well-connected, safe and accessible multi modal transport networks, where practical, while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical;</u></p> <p><u>(f) supports and enables the growth corridors in the Wellington Region, including:</u></p> <ul style="list-style-type: none"> <li><u>(i) Western Growth Corridor – Tawa to Levin;</u></li> </ul> | <p>seeking ‘particular regard’ be given to these matters in Carterton.</p> <p>Requiring this for consent applications for land use and development is also onerous and has the potential to create a significant burden in preparation and processing of consents for relatively small developments. Softening the wording will allow some discretion in when this policy should be considered.</p> |

| Provision   | Support/ oppose | Decision sought   | Submission/Reasons  |
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|   |                 | <p>(ii) <u>Eastern Growth Corridor – Hutt to Masterton;</u></p> <p>(iii) <u>Let’s Get Wellington Moving Growth Corridor.</u></p>  |   |
| <p><b>Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration</b></p> <p><i>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, <u>require all new urban development including form, layout, location, and timing is sequenced in a way that:</u></i></p> <p><i><u>(a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and</u></i></p> <p><i><u>(b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented, designated or programmed to be available prior to development occurring.</u></i></p> <p><i>particular regard shall be given to whether the proposed subdivision, use or development is located and sequenced to:</i></p> | Support in part | <p>Amend as follows:</p> <p><b>Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration</b></p> <p><i>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development, <u>require all new urban development including form, layout, location, and timing is sequenced in a way that:</u></i></p> <p><i><u>(a) the development, funding, implementation and operation of infrastructure serving the area in question is provided for; and</u></i></p> <p><i><u>(b) all infrastructure required to serve new development, including low or zero carbon, multi modal and public transport infrastructure, is available, or is consented.</u></i></p> | <p>CDC supports the requirement to ensure that new development can be supported by appropriate infrastructure.</p> <p>However, the application of this policy is potentially very broad, in that it applies to all new urban development (presumably of any scale and including infill development). Clause (b) is structured in a way that implies that new development must provide low or zero carbon, multi-modal and public transport infrastructure. CDC requests amendments to clause (b) to delete these references, as they obfuscate this policy, and other policies already encourage a range of transport infrastructure.</p> |

| Provision  | Support/<br>oppose     | Decision sought  | Submission/Reasons  |
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| <p>(a) make efficient and safe use of existing infrastructure capacity; and/or</p> <p>(b) coordinate with the development and operation of new infrastructure.</p> <p><u>Explanation</u></p> <p>Policy 58 requires development to be sequenced such that infrastructure that is necessary to service the development will be provided before the development occurs. This includes both three waters infrastructure and transport infrastructure that would be necessary to support the development.</p> |                        | <p><u>designated or programmed to be available prior to development occurring.</u></p>                         |   |
| <b>Chapter 4.4: Non-regulatory policies</b>  |                        |  |   |
| <p>General comment</p>   | <p>Support</p>         | <p>Retain the policies.</p> <p>GWRC to provide practical and financial support to implement these methods.</p> | <p>CDC is generally supportive of the non-regulatory methods proposed but notes that there will be financial implications in giving effect to these. CDC would seek practical and financial support from GWRC in implementing these methods.</p>  |
| <p><b>Policy CC.18: Increasing regional forest cover to support climate change mitigation: “right tree-right place” – non-regulatory</b></p> <p>Promote and support the planting and natural regeneration of forest to maximise the benefits for carbon sequestration, indigenous biodiversity, erosion control, freshwater and coastal ecosystems, and the social and</p>   | <p>Support in part</p> | <p>Amend the policy so that it applies to permanent forest.</p>  | <p>CDC supports this policy, and in particular the recognition of the effects that afforestation has on the social and economic wellbeing on communities. GWRC should work with local communities to manage the location and impacts of new forest, and any afforestation should be spread equitably across the region.</p> |

| Provision   | Support/<br>oppose | Decision sought     | Submission/Reasons   |
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| <p><i>economic well-being of local communities. Priority should be given to promoting and incentivising the planting and regeneration of permanent indigenous forest in preference to exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached.</i></p> <p><u>Explanation</u></p> <p><i>Policy CC.18 promotes the planting of trees to contribute to achieving net zero emissions by 2050 while seeking an increase in forest extent that maximises the cobenefits for indigenous biodiversity, land stability, aquatic ecosystem health, and social and economic well-being, as directed by Objective CC.5.</i></p> |                    |                     | <p>CDC requests that this policy is more explicit in its preference for permanent, rather than plantation, forestry.</p>   |
| <b>Chapter 4.5: Methods to implement policies</b>   |                    |                     |  |
| <p><b><i>Method 21: Information to assist with the identification <u>Identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values</u></i></b></p> <p><u><i>The regional council will liaise with the region’s territorial authorities to ensure that all district plans include, by 30 June 2025 at the latest, a schedule of indigenous ecosystems and habitats with significant indigenous biodiversity values and plan provisions to protect them from inappropriate subdivision, use and development.</i></u></p>  | Oppose             | Remove this method. | <p>As stated in the submission on Policy 23, the timeframe proposed to identify and include SNAs in the Wairarapa Combined District Plan is very short given the lack of available resource, long term planning cycle and any consequential amendments required to the Wairarapa Combined District Plan as a result of the identification process. CDC opposes the inclusion of these dates, for the same reasons outlined in its submission on Policy 23.</p> |

| Provision  | Support/<br>oppose | Decision sought     | Submission/Reasons   |
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| <p><u>Where a district-wide indigenous biodiversity assessment has not been initiated by 30 June 2024, the regional council will liaise with the territorial authority to agree on a programme of works and an understanding as to whether:</u></p> <p>a) <u>the territorial authority shall continue to have sole responsibility; or</u></p> <p>b) <u>the regional council shall take full responsibility; or</u></p> <p>c) <u>the territorial authority and the regional council shall share responsibilities.</u></p> <p><i>Prepare and disseminate information to assist with the interpretation of the criteria set out in policies 23 and 24, which require the identification and protection of indigenous ecosystems and habitats with significant indigenous biodiversity values.</i></p> <p><i>Implementation: Wellington Regional Council* and city and district councils</i></p> |                    |                     | <p>CDC supports the inclusion of alternative options where the timeframe is not able to be met.</p>  |
| <p><b>Method CC.4: Prepare a regional forest spatial plan</b></p> <p><i>Using a partnership approach, identify where to promote and support planting and natural regeneration of forest, including how to address water quality targets for sediment, to inform the requirements of Policy CC.6.</i></p>   | Support            | Retain this method. | <p>CDC supports joint preparation and implementation of a regional forest spatial plan, and requests involvement at an early stage of development.</p> |



| Provision  | Support/<br>oppose | Decision sought | Submission/Reasons |
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| <i>Implementation: Wellington Regional Council* and city and district councils</i> |                    |                 |                    |