

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.9: Regional form, design and function

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S19 Steven Ensslen	S19.001	General comments - overall	Support	Strongly supports increasing density. There is a clear need to reduce the number of single family detached homes being built.	Retain provisions seeking to increase density.
S4 Dom Harris	S4.004	General comments - urban development	Oppose in part	The last minute, unexplained and inexplicable decision not to include Johnsonville as a area for development and densification in the urban plan is absurd and counter-intuitive. It undermines the broad aspirations of the plan, and this must be reversed to enable common sense development of the region.	Enable densification oin Johnsonville.
S16 Kāpiti Coast District Council	S16.075	General comments - urban development	Oppose	<p>Council notes the only hierarchical responsibilities given to regional councils under the NPS-UD that must inform and direct the content of district plans are:</p> <ol style="list-style-type: none"> 1. Clause 3.6 - Subclause (2) - Housing bottom lines. 2. Clause 3.8 - Subclause (3) - Criteria in the RPS for determining what plan changes will be treated, for the purpose of implementing Policy 8, as adding significantly to development capacity. <p>The remainder of the NPS-UD provisions that are relevant to regional policy statements and plans are equally applicable to city and district councils - meaning there is no statutory requirement for an RPS to direct how city and district councils are to give effect to all other RPS provisions. When this is taken into account it can be seen much of the RPS Change 1 content in the regional form, design and function chapter attempts to direct city and district councils on how to meet their obligations under the NPS-UD. Such direction is unhelpful, undesirable, and risks conflicting with the Intensification Planning Instruments of the Tier 1 local authorities in the region.</p>	<p>Delete all non-mandatory provisions that are intended to direct city and district councils on how to give effect to the NPS-UD - i.e., only retain provisions in the RPS that give effect to Clause 3.8 Subclause 3 of the NPS-UD - noting Council also seeks amendments to these provisions as requested in this submission.</p> <p>Engage with the technical planning experts within all city and district councils in the region to prepare an appropriately worded variation to RPS Change 1 to give effect to the NPS-UD.</p>
S16 Kāpiti Coast District Council	S16.094	General comments - urban development	Support in part	<p>Opposes all references to the Wellington Regional Growth Framework within the RPS, and in particular the suggestion it forms the interim strategic growth direction for the region prior to the development of a Future Development Strategy (FDS) under the NPS-UD.</p> <p>The development of the WRGF was not significantly robust and did not follow the special consultative procedure required for a plan or strategy under the Local Government Act, and it therefore lacks any statutory</p>	<p>Delete all references to, and information from the WRGF throughout proposed RPS Change 1.</p> <p>Replace all references to the WRGF with placeholder references to a Future Development Strategy that has been prepared and published in accordance with the requirements of Subpart 4 of the NPS-UD.</p>

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				<p>weight under the RMA as a document prepared under other legislation.</p> <p>References to the WRGF, and the interim legal status, undermines and fails to acknowledge existing growth strategies prepared by city and district councils in the region under the LGA. They accordingly carry weight under the RMA when preparing and changing plans (s.74(2)(b)(i)).</p> <p>Notes the statutory weight of a non-statutory document such as the WRGF is not given statutory weight simply via its inclusion in the RPS unless the pre-notification consultation requirements of Schedule 1, Clause 34 were carried out before RPS Change 1 was publicly notified. Not aware of this mandatory consultation having been carried out.</p>	
S17 Chelsea Kershaw	S17.001	General comments - urban development	Support	Support RPS that helps to deliver more homes without higher transport-related greenhouse gas emissions.	Retain as notified.
S17 Chelsea Kershaw	S17.003	General comments - urban development	Support	Creating climate-resilient urban areas is supported.	Retain, refine and enhance provisions.
S17 Chelsea Kershaw	S17.005	General comments - urban development	Support in part	Do not support greenfield subdivisions that externalise environmental and infrastructure costs, As such, support requirement for new greenfield developments to show a Travel Demand Management (TDM) plan. There may be other options besides TDM plans to ensure the development of an urban form that is not private car-dependent.	Consider other policy tools than TDM plans - provisions should be strengthened rather than diluted.
S17 Chelsea Kershaw	S17.006	General comments - urban development	Support in part	Important for all councils to do everything they can to incentivise good intensification for growth, rather than greenfield sprawl.	Retain and strengthen provisions to incentivise good intensification for growth, rather than greenfield sprawl.
S19 Steven Ensslen	S19.002	General comments - urban	Support	Need to encourage people to use public transport, by improving public transport, by neighbourhood design	Retain as notified

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		developme nt		centred around public transport, and by making transport by car more difficult.	
S22 Tegan McGowan	S22.001	General comments - urban developme nt	Support in part	Support councils doing everything to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.
S22 Tegan McGowan	S22.003	General comments - urban developme nt	Support	Support creating climate-resilient urban areas.	Retain, refine and enhance provisions.
S24 Helen Payn	S24.001	General comments - urban developme nt	Support	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools, besides TDM plans, provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S24 Helen Payn	S24.003	General comments - urban developme nt	Support	Creating climate-resilient urban areas is supported.	Retain, refine and enhance provisions.
S24 Helen Payn	S24.005	General comments - urban developme nt	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions good intensification for growth, rather than greenfield.
S25 Carterton District Council	S25.013	General comments - urban developme nt	Support in part	CDC seeks an objective that specifically provides for urban areas which are not urban environments. This would support Policy 31 in particular.	Add an objective that provides direction for urban areas - those areas that are within urban zones, but not part of 'urban environments'.

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S27 Peter Ramage	S27.001	General comments - urban development	Support in part	Support GWRC making policy to influence councils in the Wellington region to not plan to build homes without considering the impact on emissions over the life cycle of those homes. Should not support greenfield single family detached houses in places where it is hard to provide public transport, and where most day-to-day tasks will require a car. Decisions on the built environment have impacts for decades. We need to get it right first time. Development needs to be focused in the walkable catchments of places people already want to be, or with convenient public transport to take them to these places.	Retain and strengthen provisions relating to urban intensification and reducing urban emissions.
S27 Peter Ramage	S27.004	General comments - urban development	Support in part	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools, besides TDM plans, provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S28 Philippa Yasbek	S28.001	General comments - urban development	Support	Support ensuring that new homes generate fewer emissions on average than existing homes. Building sprawling, car-intensive suburbs locks in large amounts of emissions for decades as these are very long-lived investments. New housing should be through intensification of existing areas and those close to amenities rather than creating new car-dependent suburbs. Transport Demand Management Plans would be a helpful check on unsustainable new suburbs.	Retain as notified.
S28 Philippa Yasbek	S28.004	General comments - urban development	Support	Support creating climate-resilient urban area.	Retain as notified.
S30 Porirua City Council	S30.020	General comments - urban development	Oppose	This chapter needs amendment as: <ul style="list-style-type: none"> • It fails to appropriately give effect to the NPS-UD and to recognise the benefits of urban development. • Objective 22 duplicates other objectives in the RPS. • The objectives and policies create a polycentric urban form with six regionally significant commercial centres, contrary to the NPS-UD. 	Amend the chapter to give effect to the NPS-UD, and increase regulatory certainty.
S35 Oliver Bruce	S35.002	General comments - urban	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. It's counterproductive that in this day and age, traffic-inducing greenfield subdivisions of single-family detached houses are still the	Retain and strengthen provisions good intensification for growth, rather than greenfield.

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		developme nt		lion's share of new homes being built. Buildings, streets, roads, parks etc will be there for decades, and how well they're done will profoundly limit (or enable) the people who live there. It's currently easier and more profitable to do traditional car- centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	
S35 Oliver Bruce	S35.003	General comments - urban developme nt	Support in part	Need to make sure that new developments allow people to use other transport options than private vehicles. There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S35 Oliver Bruce	S35.006	General comments - urban developme nt	Support	Support provisions relating to climate-resilient urban areas.	Provisions should be retained, refined and enhanced.
S37 Jennifer Van Beynen	S37.002	General comments - urban developme nt	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions relating to good intensification and reducing urban emission, rather than greenfield.
S37 Jennifer Van Beynen	S37.003	General comments - urban developme nt	Support in part	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other policy tools to TDM, provisions should be strengthened, enhanced, made more sophisticated and more comprehensive.
S37 Jennifer Van Beynen	S37.006	General comments - urban developme nt	Support	Support provisions relating to climate-resilient urban areas.	Retain, refine and enhance provisions.

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S51 Khoi Phan	S51.001	General comments - urban development	Support in part	Support councils ensuring that more homes doesn't mean more emissions. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. That is why it's extra important for councils -to do everything they possibly can to get good intensification for growth, rather than greenfield. Not opposed to greenfield that can pass the test of being founded on high accessibility, not mobility, and whose movement network is very sustainable.	Retain and strengthen provisions relating to intensification rather than greenfield growth.
S51 Khoi Phan	S51.003	General comments - urban development	Not Stated / Neutral	Active transport mode must be integrated into existing plans for public transport to further enable Bike-Train mode. Currently there are provision to encourage the uptake of this mode in the regional plan, district plan nor the regional-rail business case.	Strengthen provision relating to public and active transport.
S51 Khoi Phan	S51.004	General comments - urban development	Support in part	Requirements to have TDM plan not strong enough. There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools than TDM plans, provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S51 Khoi Phan	S51.005	General comments - urban development	Support	Not stated.	Support councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing density done well by intensification.
S51 Khoi Phan	S51.007	General comments - urban development	Support	Support provisions relating to creating climate-resilient urban areas.	Retain, refine and enhance provisions.
S53 Ellen Legg	S53.001	General comments - urban development	Support	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions that encourage good intensification rather than greenfield.
S53 Ellen Legg	S53.003	General comments - urban	Support in part	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools in addition to TDM's to allow people to use other transport options.

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		developme nt			
S53 Ellen Legg	S53.006	General comments - urban developme nt	Support	Support the provisions for creating climate-resilient urban areas.	Retain as notified.
S56 Sam Gilkison	S56.001	General comments - urban developme nt	Oppose	We need to build more homes in places where there is land (Churton Park, Wainuiomarta, Crofton downs). Apartments are good for young adults but they are not good for raising a family. We are in a housing crisis and this will make it much harder to build homes.	Do not progress proposed restrictions on greenfield development.
S60 Grant Buchan	S60.003	General comments - urban developme nt	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions good intensification for growth, rather than greenfield.
S60 Grant Buchan	S60.004	General comments - urban developme nt	Support in part	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S60 Grant Buchan	S60.007	General comments - urban developme nt	Support	Support creating climate-resilient urban areas.	Retain, refine and enhance provisions.
S61 Patrick Morgan	S61.003	General comments - urban developme nt	Support in part	Support the council ensuring that building more homes doesn't mean more emissions. We are in a climate crisis and councils have a very important role in lowering our emissions. Single-family detached houses in greenfield subdivisions should not be the majority of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions good intensification for growth, rather than greenfield.

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S61 Patrick Morgan	S61.004	General comments - urban development	Support in part	To make sure that new developments allow people to use other transport options than private vehicles.	Consider other policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S61 Patrick Morgan	S61.007	General comments - urban development	Support	Support creating climate-resilient urban areas..	Retain, refine and enhance provisions.
S62 Philip Clegg	S62.004	General comments - urban development	Oppose	Concerned about references to wrapping 'constraints' around the central government's housing intensification direction and the NPS-UD when regional policy statements are subordinate to primary legislation and national policy statements, and are superior to regional and district plans.	Amend the proposed RPS to remove any and all clauses that seek to "constrain" the intent and direction of NPS-UD.
S64 Rachel Bolstad	S64.005	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Retain, refine and enhance provisions.
S71 Parents for Climate Aotearoa	S71.002	General comments - urban development	Support	Building homes should not mean increased emissions, especially through urban sprawl and encouraging car dependent suburbs.	Need to maintain and strengthen the links in the RPS between transport and urban development and emissions reduction so that any new transport and urban development projects must show how they will not increase emissions.
S71 Parents for Climate Aotearoa	S71.003	General comments - urban development	Support	Creating climate resilient urban areas is win win for everyone now and for future generations.	Include a non-regulatory method to require the Council to invest into upskilling the various teams such as planning, regulatory and consenting to be grounded in the skills and knowledge on how to do intensification well.
S73 Alicia Hall	S73.004	General comments - urban development	Support	I support Councils being empowered and upskilled in implementing good policy and decision making around intensification and limiting the development of urban sprawl/car dependent neighbourhoods. Greenfield projects must show how they do not add to or increase emissions and how they can contribute to emissions reductions through good planning. Maintaining and strengthening the links in the RPS between how we live (urban development) and how we move around	Retain as notified.

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				(transport) and emissions reduction so that all new projects involved in urban development and transport must show how they will not increase emissions.	
S74 Finn Hall	S74.004	General comments - urban development	Support	<p>Our generation will not be as car dependent as my parents so we need you to make good decisions now so it will be easier for us to live and work in the region in the future. Even making it easier to make different choices on how we get to school would be awesome.</p> <p>We need you to put policies in place that prevent urban development creating more emissions in a time where we need to reduce them and create more choices in how we are able to travel around our region.</p>	Retain as notified.
S75 Te Aka Tauiira - Victoria University of Wellington Students Association (VUWSA)	S75.002	General comments - urban development	Support	<p>Support the maintenance and strengthening of the links in the RPS between transport and urban development emissions reduction so that any new transport and urban development projects must show how they will not increase emissions.</p> <p>Support provisions that set a clear direction that everyone deserves access to good housing.</p> <p>Support provisions that encourage denser suburbs that are well connected by public transport with reduced dependence on private motor vehicle transport.</p>	Retain as notified.
S76 Gene Clendon	S76.002	General comments - urban development	Support in part	Support provisions ensuring that more homes do not result in more emissions. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.
S76 Gene Clendon	S76.007	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Retain, refine and enhance provisions.
S77 James Burgess	S77.001	General comments - urban development	Support in part	Supports the changes proposed to reduce the climate impact of new housing, however need to remove more barriers to more compact, livable developments with better transport choice and lower environmental impact.	No specific relief requested except for additional staff resources and training and enforcement measures to better achieve more compact, liveable developments.

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S82 Jonathan Markwick	S82.003	General comments - urban development	Support	Support allowing more housing to be built where it is most in demand (the inner city and inner suburbs). This will increase housing affordability, livability and transport sustainability.	Retain as notified.
S89 VicLabour	S89.005	General comments - urban development	Support	Support recognition of the lack of housing Wellington has in the modifications to Chapter 3.9, particularly regarding the lack of variety of housing (i.e.: papakāinga). Support ensuring that the housing in Wellington is diverse and built denser, otherwise we will never be able to sustain being the "green" region we desire to be. This does not just apply to Wellington City, but it applies everywhere across the region.	Retain as notified.
S90 Bronwyn Bell	S90.002	General comments - urban development	Support in part	Support provisions ensuring that more homes do not result in more emissions. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils - of all stripes - to do everything they possibly can to get good intensification for growth, rather than greenfield. Not opposed to greenfield that can pass the test of being founded on high accessibility, not mobility, and whose movement network is very sustainable.	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.
S90 Bronwyn Bell	S90.007	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Retain, refine and enhance provisions.
S92 Ruby Miller-Kopelov	S92.001	General comments - urban development	Support	The policy deters greenfield subdivisions that externalise environmental and infrastructure costs. There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools than TDM - provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S92 Ruby Miller-Kopelov	S92.003	General comments - urban development	Support	Creating climate-resilient urban areas is supported	Retain, refine and enhance provisions.
S92 Ruby Miller-Kopelov	S92.005	General comments - urban	Support in part	Support councils ensuring that more homes doesn't mean more emissions. Support well-designed, higher-density housing. Continuing to build traffic-inducing	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.

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		developme nt		greenfield subdivisions of single- family detached houses is simply ridiculous. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils - of all stripes - to do everything they possibly can to get good intensification for growth, rather than greenfield.	
S93 Isabella Cawthorn	S93.001	General comments - urban developme nt	Support	The RPS helps to deliver more homes without higher transport-related greenhouse gas emissions. The policy deters greenfield subdivisions that externalise environmental and infrastructure costs. There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other tools to TDM - provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S93 Isabella Cawthorn	S93.003	General comments - urban developme nt	Support	Creating climate-resilient urban areas are supported.	Retain, refine and enhance provisions.
S93 Isabella Cawthorn	S93.005	General comments - urban developme nt	Support in part	Support all councils ensuring that more homes doesn't mean more emissions. It's shameful that in this day and age, traffic-inducing greenfield subdivisions of single-family detached houses are still the lion's share of new homes being built. Everyone knows it's easier and more profitable to do traditional car-centric suburban greenfield. And that's why it's extra important for councils - of all stripes - to do everything they possibly can to get good intensification for growth, rather than greenfield. I'm not opposed to greenfield that can pass the test of being founded on high accessibility, not mobility, and whose movement network is very sustainable	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.
S94 Guardians of the Bays Incorporat ed	S94.013	General comments - urban developme nt	Support in part	Supports ensuring more homes do not mean more green house emissions, but suggests a more inter-regional transport framework through rail and sea rather than flying (emissions).	Amend the provision to address the relief sought in the submission.
S96 Sarah (Dr) Kerkin	S96.004	General comments - urban	Oppose	Concerned about references to wrapping 'constraints' around the central government's housing intensification direction and the NPS-UD when regional policy statements are subordinate to primary legislation and	Amend the proposed RPS to remove any and all clauses that seek to "constrain" the intent and direction of NPS-UD.

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		development		national policy statements, and are superior to regional and district plans.	
S98 Teresa Homan	S98.001	General comments - urban development	Support in part	Supports low rise intensification of housing across the Wellington region and specifically in Upper Hutt. Housing should be on identifiable available urban and rural land not used for production of food. However, recognises a need to limit housing based on population growth and fluctuation.	Add provision(s) which consider the effect that overinflated housing can have on the health and welfare of current and future residents and undue strain on the regions infrastructure.
S98 Teresa Homan	S98.002	General comments - urban development	Support in part	All public transport needs to be connected and subsidised by central government, regional council and local territorial authorities. There is no need for housing to be concentrated near rail if other forms of public transport are connected such as buses to trains, inner city shuttle services.	Amend provisions to address relief sought.
S98 Teresa Homan	S98.003	General comments - urban development	Support	Supports improved cycle tracks (active transport routes).	Retain as notified.
S98 Teresa Homan	S98.004	General comments - urban development	Support	Supports affordable housing provisions.	Retain as notified.
S126 Templeton Kapiti Limited (TKL)	S126.004	General comments - urban development	Not Stated / Neutral	The TKL Land could implement the Urban Design Amendments.	Retain as notified.
S129 Waka Kotahi NZ Transport Agency	S129.024	General comments - urban development	Support in part	Intensification of existing urban areas be prioritised and further consideration be given to the role of enabling infrastructure as lead infrastructure planned for and included in the Future Development Strategies.	Clarify how Objective 22A provides the scope for Policy 55 to define what appropriate urban expansion is and how it will be provided.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.006	General comments - urban development	Not Stated / Neutral	The development of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 and the National Policy Statement on Urban Development 2020, and the timeframes provided for their incorporation into the GWRC RPS do not uphold the guarantee of tino rangatiratanga. Ātiawa therefore have fundamental concerns with the process and direction given by the Government requiring this	Ātiawa seeks further reference to mana whenua values, as well as addressing the impact of poor urban design on mana whenua and their relationship with the natural world and to provide for our values and role as mana whenua.

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				Proposed Regional Policy Statement Change 1. This means that Ātiawa has had inadequate opportunities and insufficient time to contribute to the development of the RPS Change 1. This process and the intensification provisions also prejudice the outcomes and potential outcomes of our Treaty of Waitangi Settlement.	
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.044	General comments - urban development	Support in part	Objective 22A Seeks growth that both retains the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. Housing should be supported by life sustaining infrastructure including improved public transport hubs. The tino rangatiranga of hapū and iwi should be recognised in relation to their land and waterways, and how this can be exercised to better manage the sustainable use of these resources. The manaakitanga that iwi, hapū and ahi kā have provided over generations to share their home with Tangata Tiriti needs to be recognised in the way growth is managed. This includes recognising the significant role of Marae as a spiritual and cultural home for our people, a social hub and in civil emergencies. Proactive initiatives are required to ensure that our unique history, identity and culture is respected and given expression in the region.	Amend Objective 22A and underlying policies to address the relief sought in the submission.
S135 Best Farm Ltd/Hunters Hill Ltd/Lincolnshire Farm Ltd/Stebbings Farmlands Ltd	S135.002	General comments - urban development	Support	The amendments and new provisions give effect to the NPS-UD 2020 and RM (Enabling Housing Supply & other Matters) Amendment Act 2021 that seeks to increase housing capacity in the urban areas, in particular high density/heights around centres and rapid transport stops to improve housing affordability.	Retain as notified.
S141 Generation Zero Wellington	S141.004	General comments - urban development	Support	Housing is another topic which touches on almost every area of our lives and we are currently facing a crisis in; Denser cities allow people to get anywhere they need without the requirement of owning a car and can help the creation of better public transport routes that serve a greater number of people, further decreasing peoples reliance on cars. Similarly, greater density can be used to	Retain as notified.

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				create a greater supply of houses to ease the pressure on a housing market that is growing more and more inaccessible and thus gives more people the opportunity to live in a home that is stable, warm and affordable. This is just the surface level of the benefits that greater density can bring but it is a tool that has power to reshape the communities that we are living in and address some of the most pressing concerns, it's also a tool that has been severely under-utilised in recent years.	
S143 Megan Gallagher	S143.001	General comments - urban development	Support in part	Support for policy that ensures all councils can meet housing needs without forcing people to engage in carbon emitting activities (ICE vehicles, longer commute times, living in areas with poor public transport). There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Support provisions being strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.	Consider additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Amend the provisions to address the relief sought in the submission.
S143 Megan Gallagher	S143.002	General comments - urban development	Not Stated / Neutral	If more apartments, townhouses are built with a focus on warmth, community and proximity to amenities people will buy them. Stop encouraging low density greenfield subdivisions in what was once farmers and food production areas.	Amend the provisions to address the relief sought in the submission.
S143 Megan Gallagher	S143.004	General comments - urban development	Support in part	Support Councils' planning, regulatory and consenting teams boosted and upskilled to become more comfortable and confident at doing "density done well" by intensification. This includes supporting co-designed community development for groups wanting to build housing together in non traditional ways.	Amend provisions to address the relief sought in the submission.
S148 Wellington International Airport Ltd (WIAL)	S148.009	General comments - urban development	Not Stated / Neutral	The provisions for the most part are giving effect to the National Policy Statement on Urban Development ("NPSUD"), however the provisions also need to appropriately recognise that in some situations housing developments can be constrained by the "qualifying matters" that are also set out in the NPSUD. This specifically includes areas of land which are subject to designations and the ability to safely and efficiently operate regionally significant infrastructure.	The RPS should also strike a balance in terms of the timing of development so that the provisions do not have the potential to unnecessarily inhibit appropriate development including at the Airport. The Airport is a facilitator of traffic and must take a long term approach to development.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.9: Regional form, design and function

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S151 NZ Centre for Sustainable Cities	S151.010	General comments - urban development	Support in part	Do not support some of the wording of proposed policies relating to regional urban form / peripheral urban development.	Amend provisions to address relief sought in submission.
S152 Michelle Ducat	S152.001	General comments - urban development	Support in part	Support development rules that ensure any investment in infrastructure will also ensure low/zero emissions, enhances the wellbeing of people and the environment and is climate resilient. All our infrastructure dollars have to be spent wisely to ensure we are giving our communities the best chance to live lives in communities that can thrive. People need homes, but they also need community and community infrastructure that is not centred on private vehicle ownership.	Housing development must be centred on mitigation of emissions, adaptation to climate change, and enhancement of community connection and the environment we depend upon - and centres on the the aspirations of mana whenua.
S152 Michelle Ducat	S152.003	General comments - urban development	Support in part	Support councils ensuring more homes do not mean more emissions. It's ridiculous that in this day and age, traffic-inducing greenfield subdivisions of single-family detached houses are still the lion's share of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. That is why it is important for councils - of all stripes - to do everything they possibly can to get good intensification for growth, rather than greenfield.	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.
S152 Michelle Ducat	S152.005	General comments - urban development	Support in part	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric.	Consider other options to TDM plans - provisions should be strengthened, enhanced, made more sophisticated and more comprehensive rather than diluted.
S152 Michelle Ducat	S152.008	General comments - urban development	Support	Support provisions relating to climate-resilient urban areas.	Provisions should be retained, refined and enhanced.
S154 Investore Property Limited	S154.012	General comments - urban development	Oppose in part	Seeks that RPS Change 1 is amended to enable an urban form in metropolitan centres that reflects the demand for housing and business use. In Johnsonville, this would reflect significant demand and intensification. The NPS-UD anticipates that there will be a comprehensive review of district plans and regional policy statements to ensure that they enable an urban form that gives effect to the requirements for well-	Amend the RPS Change 1 to address the relief sought in the submission and make any consequential changes.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.9: Regional form, design and function

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				functioning urban environments in the NPS-UD. RPS Change 1 does not reflect this approach. The amendments to the RPS are disparate and are unlikely to achieve the strategic purpose of the NPS-UD, including Policy 1 of the NPS-UD to contribute to well-functioning urban environments.	
S155 Stride Investment Management Limited	S155.009	General comments - urban development	Oppose in part	<p>Seeks that RPS Change 1 is amended to enable an urban form in metropolitan centres that reflects the demand for housing and business use. In Johnsonville, this would reflect significant demand and intensification.</p> <p>The NPS-UD anticipates that there will be a comprehensive review of district plans and regional policy statements to ensure that they enable an urban form that gives effect to the requirements for well-functioning urban environments in the NPS-UD. RPS Change 1 does not reflect this approach. The amendments to the RPS are disparate and are unlikely to achieve the strategic purpose of the NPS-UD, including Policy 1 of the NPS-UD to contribute to well-functioning urban environments.</p>	Amend the RPS Change 1 to address the relief sought in the submission and make any consequential changes.
S158 Kāinga Ora Homes and Communities	S158.047	General comments - urban development	Support in part	Urban form and function - Supports PC1 giving effect to the NPS-UD however objectives and policies can be simplified.	Seeks that the related objectives and policies are simplified and are more directive and applicable to the Wellington Region.
S158 Kāinga Ora Homes and Communities	S158.048	General comments - urban development	Support in part	These changes are requested in line with previous submissions made on the District Council IPI's and Wellington City Council Proposed Plan to achieve regional consistency. Seeks better direction for where high density development should occur and seeks to include prescribed minimum walkable catchments.	Seeks that a defined centres hierarchy is included in line with the National Planning Standards and NPS-UD. Seek to identify Wellington City centre as the City Centre Zone of the region and that additional centres are identified as Metropolitan and Town Centres
S163 Wairarapa Federated Farmers	S163.039	General comments - urban development	Oppose	The National Planning Standards direct that Regional Policy Statements should include a chapter on urban form and development. Consistent with this direction, the existing chapter introduction and the proposed amendments to it (to give effect to the NPS for Urban Development) are all clearly directed to urban areas.	That the Chapter 3.9 title be amended to read Regional Urban form, design and function OR Urban form and development

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.9: Regional form, design and function

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S163 Wairarapa Federated Farmers	S163.040	General comments - urban development	Oppose	Do not agree that any of the proposed regional form, design and function provisions are freshwater instruments, refer to submission for details of relevant case law.	Delete FW icons
S164 Megan Lane	S164.001	General comments - urban development	Support in part	Support all councils ensuring that more homes don't mean more emissions. Ridiculous that traffic-inducing greenfield subdivisions of single-family detached houses are still the lion's share of new homes being built. There are plenty of reasons why it's easier and more profitable to do traditional car-centric suburban greenfield. It's important for councils to do everything they possibly can to get good intensification for growth, rather than greenfield. Not opposed to greenfield if it's based on high accessibility, not mobility, with a sustainable movement network.	Retain and strengthen provisions to get good intensification for growth, rather than greenfield.
S164 Megan Lane	S164.003	General comments - urban development	Support	Not opposed to greenfield if it's based on high accessibility, not mobility, with a sustainable movement network.	There may well be additional or different policy tools, besides TDM plans, that councils can use to ensure developments aren't private-car-centric. Support these provisions strengthened, enhanced, and made more sophisticated and more comprehensive.
S164 Megan Lane	S164.006	General comments - urban development	Support	Support provisions for climate-resilient urban areas.	Provisions should be retained, refined and enhanced.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.031	General comments - urban development	Support in part	We acknowledge that the policy direction in the NPSUD is to provide for urban development; however, this is not to be provided at any cost. The adverse effects of development must be considered in undertaking all council functions and responsibilities, and in achieving the purpose of the Act.	Seek deletion of the directive language in the amended provisions that provide for urban development and expansion. Policies need to be subject to meeting other requirements such as s6 of the RMA.
S166 Masterton District Council	S166.020	General comments - urban	Not Stated / Neutral	Objective 22A Need further clarity on how this impacts the Wairarapa District Councils in terms of intensification, and if so - how?	Clarifications. Further clarity sought on how this will impact Tier 3 councils.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.9: Regional form, design and function

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		development		The review of the WCDP is proposing to intensify the residential zone (in certain areas).	
S167 Taranaki Whānui	S167.050	General comments - urban development	Support	Taranaki Whānui supports the direction of general comments and make specific comment on subsequent parts below.	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.026	General comments - urban development	Support	Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga	Specify the characteristics of well-functioning urban environments relating to the provision of a variety of homes include quality (i.e. healthy), as well as affordability and location.
S168 Rangitāne O Wairarapa Inc	S168.027	General comments - urban development	Support	Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga	Strengthen policies and methods that provide for the occupation, use, development and ongoing relationship of tangata whenua with their ancestral land
S168 Rangitāne O Wairarapa Inc	S168.028	General comments - urban development	Support	Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga.	Environmental research explicitly recognises and provides for Mātauranga Māori.
S168 Rangitāne O Wairarapa Inc	S168.029	General comments - urban development	Support	The decision requested has potential to improve both tangata whenua and wider community outcomes	Provide further opportunities for tangata whenua to build up with iwi their social, cultural, environmental and economic capacity, using Mātauranga Māori; by implementing a kaupapa Māori-based model or framework for urban development that is outcome focused (such as the Whānau Ora Outcomes Framework).
S168 Rangitāne O Wairarapa Inc	S168.030	General comments - urban development	Support	Development in urban areas and urban expansion in the past has resulted in poor outcomes for tangata whenua in terms of quantity, quality and affordability of housing, the ability to construct papakāinga, as well as adversely affecting our relationship with our culture, land, water, sites, wāhi tapu and other taonga.	Policies relating to appropriate urban expansion and development in rural areas are consistent in the issues covered and include a requirement to consider all matters covered in Section 6(e) of the RMA 1991.
S11 Outdoor Bliss	S11.025	Regional form, design and function	Not Stated / Neutral	In 30 years most of the baby boomers will be gone and people are having less or no children. Are these projections still correct.	Review projections on page 78.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 3.9: Regional form, design and function

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Heather Blissett		introductory text			
S16 Kāpiti Coast District Council	S16.095	Regional form, design and function introductory text	Support	Supports the reference to the importance of design guides in achieving well-functioning urban environments. Also supports the recognition that sporadic, uncontrolled and uncoordinated development can result in adverse effects on mana whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.	Not stated.
S25 Carterton District Council	S25.012	Regional form, design and function introductory text	Support in part	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.	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.
S30 Porirua City Council	S30.021	Regional form, design and function introductory text	Oppose	<p>Long introductory statements unnecessarily lengthen a plan which is not consistent with best practice plan making. It is also not necessary to replicate matters covered in section 32 reports.</p> <p>Further, the RPS should use terms that are consistent with the NPS-UD and the national planning standards. For example, regionally significant centres is not a term used in either and should be changed.</p>	<p>Amend introduction to shorten and use language consistent with national direction, and/or reword as follows: Regional form is about the physical arrangement within and between urban and rural communities. Good urban design seeks to ensure that the design of buildings, places, spaces, and networks work well for mana whenua / tangata whenua and communities, and are environmentally responsive.</p> <p>The concept of well-functioning urban environments was introduced in the National Policy Statement on Urban Development 2020. There are a number of characteristics and qualities that contribute to forming a well-functioning urban environment. Well-functioning urban environments enhances the quality of life for residents as it is easier to get around, allows for a greater supply and choice of housing close to where people work or to public transport, and provide vibrant, safe, and cohesive centres that are well connected by public and active transport, and which also enhance business activity. This network of centres support urban intensification. Well-functioning urban environments enable communities and businesses to be more resilient to the effects of climate change, and the uptake of zero and low-carbon emission modes is supported throughout the region. Well-functioning urban environments have</p>

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>compact urban form and are well-designed and planned through the use of spatial and development strategies and use of design guidance. Well-functioning urban environments are low impact, incorporating water sensitive urban design and managing the effects on other regionally significant values and features as identified in this RPS. Central Wellington city contains the central business district for the region and represents the primary regional centre where community, cultural, business and entertainment activities, as well as residential activities are focused. Its continued viability, vibrancy and accessibility are important to the whole region. There are also a other sub-regionally significant centres that are an important part of the region's form. These centres are significant areas of transport movement and civic and community investment activities. They also have the potential to support new development and increase the range and diversity of activities. Good quality high and medium density housing in and around these centres, and existing and planned rapid transit stops, would provide increased housing choice and affordability. Further medium and high density development must be enabled within the fast-growing districts of the Region, being those identified in the National Policy Statement for Urban Development as tier 1 territorial authorities. If this development occurs, it will further improve housing affordability. Encouraging Enabling the use and development of existing centres of business activity can also lead to social and economic benefits, and is necessary to achieving well- functioning urban</p>

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>environments. Additional local employment and educational opportunities around in these centres could also provide people with greater choice about where they work and obtain skills training. The design of urban and rural communities/smaller centres, the region's industrial business areas, the port, the airport, the road and public transport network, and the region's open space network are fundamental to well-functioning urban environments and regional form.</p> <p>The Wellington Regional Growth Framework provides a non-statutory spatial plan that has been developed by local government, central government, and iwi partners in the Wellington- Horowhenua region. It sets out the key issues identified for urban growth and development and provides a 30-year spatial plan that sets a long-term vision for changes and urban development in the Wellington Region.</p> <p>(...)</p> <p>The region is facing population change and growth pressure. Based on the May 2022 Wellington Regional Housing and Business Development Capacity Assessment (HBA), the Greater Wellington urban environment is expected to grow by around 195,000 people by 2051. As of May 2022, district plans within the Greater Wellington region, do not provide sufficient development capacity for the long term with a shortfall of more than 25,000 dwellings.</p> <p>(...)</p>

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					<p>National direction provided through the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 supports increased supply of affordable housing. However, high levels of development without suitable constraints management risks undermining other characteristics and qualities of a well-functioning urban environment. We There is a need to recognise and provide for other regionally significant values and features, including managing freshwater, indigenous biodiversity, values of significance to mana whenua / tangata whenua and management of the coastal environment. Most of the region, including its existing urban areas, has significant exposure to multiple natural hazards, and there is continuing demand to build in coastal and/or natural hazard-prone areas. Development pressure can reduce transport efficiency and limit the ability of all centres to provide community services and employment. Medium and high density Development that is enabled through national direction has the potential to result in poor urban design outcomes, in the absence of sufficient design guidance.</p>
<p>S49 Chorus New Zealand Limited, Spark New Zealand</p>	<p>S49.001</p>	<p>Regional form, design and function introductory text</p>	<p>Support in part</p>	<p>The existing infrastructure examples provided is too limited, and should align with the RPS definition of Regionally Significant Infrastructure as proposed in RPS PC1.</p>	<p>Amend the introduction to Chapter 3.9 as follows: 2. Sporadic, uncontrolled and/or uncoordinated development Sporadic, uncontrolled and/or uncoordinated, development (including of infrastructure) can adversely affect the region's compact form. This can, among other things, result in: (a) new development that is poorly located in relation to</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Trading Limited, Vodafone Spark New Zealand Trading Limited					existing infrastructure (such as telecommunications networks , roads, public transport, water supply, sewage and stormwater systems) and is costly or otherwise difficult to service
S63 Mary Beth Taylor	S63.003	Regional form, design and function introductory text	Support in part	Finite planet with finite resources = finite growth. Te Awa Kairangi is exhibiting symptoms of having reached its limit for extraction. This would logically mean that growth and development should be curtailed until the health of the awa is restored.	Include mention of 'Limits to Growth'
S78 Beef + Lamb New Zealand Limited	S78.006	Regional form, design and function introductory text	Not Stated / Neutral	Accepts that amendments to Chapter 3.9 Regional Form, Design and Function as summarised in the table on pages 75 and 76 of PC1 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
S95 Tony Chad	S95.002	Regional form, design and function introductory text	Support in part	Finite planet with finite resources = finite growth. Te Awa Kairangi is exhibiting symptoms of having reached its limit for extraction. This would logically mean that growth and development should be curtailed until the health of the awa is restored.	Include mention of 'Limits to Growth'
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.074	Regional form, design and function introductory text	Support	Generally supports the inclusion of the 'Chapter Introductions' for the Regional form, design and function.	Retain as notified.
S113 Wellington Water	S113.008	Regional form, design and function introductory text	Oppose	It is unclear how Te Mana o te Wai and three waters infrastructure interacts with the 'well-functioning urban environments'. This issue runs throughout this chapter.	Amend paragraph on page 76: Well-functioning urban environments enable communities and businesses to be more resilient to the effects of climate change, and the uptake of zero and low-carbon emission modes is supported throughout the region. Well-functioning urban environments have compact urban form and are well-designed and planned through the use of spatial and development strategies and use of design guidance. Well-functioning urban environments are low impact, support Te Mana o te Wai , incorporating water sensitive

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					urban design, and managing the effects on other regionally significant values and features as identified in this RPS.
S113 Wellington Water	S113.009	Regional form, design and function introductory text	Oppose	<p>Given the upcoming investments that three waters infrastructure providers are considering in relation to both growth and water quality improvement, additional clarity would be helpful.</p> <p>The chapter also fails to recognise the importance of regionally significant infrastructure and its benefits.</p>	<p>Amend paragraph on page 79</p> <p>Medium and high-density development that is enabled through national direction has the potential to result in poor urban design outcomes, in the absence of sufficient design guidance. Effective regionally significant infrastructure is necessary for a well functioning urban environment.</p>
S113 Wellington Water	S113.010	Regional form, design and function introductory text	Oppose	<p>The chapter also fails to recognise the importance of regionally significant infrastructure and its benefits.</p> <p>Potential interactions include: Stormwater flooding Stormwater quality Wastewater contamination Efficient use of water.</p>	<p>Include an additional issues on page 80:</p> <p>AA Inadequate infrastructure There is a lack of supporting infrastructure to enable the development of sufficient housing and the provision of quality urban environments.</p>
S115 Hutt City Council	S115.024	Regional form, design and function introductory text	Oppose	This introduction is very long and does not add to understanding the objectives and policies relating to regional form, design, and function.	Reduce the length of the introduction and ensure it provides sufficient guidance for RPS users about the objectives and policies relating to regional form, design and function.
S125 R P Mansell; A J Mansell, & M R Mansell	S125.002	Regional form, design and function introductory text	Support	<p>Support well-function urban environments consistent with the NPS-UD.</p> <p>Includes reference to the Western Growth Corridor - Tawa to Levin (included in the Wellington Regional Growth Framework).</p>	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S126 Templeton Kapiti Limited (TKL)	S126.010	Regional form, design and function introductory text	Oppose in part	To support other submission point requesting the deletion of Kapiti Coast Airport from the definitions of Regionally Significant Infrastructure.	Amend 'Figure 3: Wellington Regional Growth Framework corridors', to remove the small aeroplane annotation just above the centre of the 'Western Growth Corridor - Tawa to Levin'.
S128 Horticulture New Zealand	S128.013	Regional form, design and function introductory text	Support in part	<p>It is noted that a focus of Proposed Change 1 is to addressing the lack of urban development capacity and the interface between urban development and freshwater.</p> <p>It would be remiss in our view to not include a productive and sustainable rural environment in planning provisions regarding regional form, design and function. In particular, the RPS should protect highly productive land for food production and from reverse sensitivity.</p> <p>The NPSHPL notes that there needs to be integration in the management of HPL with freshwater management and urban development The Wellington Regional Growth Framework (WRGF) which this RPS acknowledged in their constraints analysis:</p> <ol style="list-style-type: none"> 1. highly productive land (as Wāhi Toitū) 2. high quality soils (as Wāhi Toiora). <p>The WRGF noted that the Wairarapa and Horowhenua contain important areas of highly productive land (noting the boundary of this work extended into the Horizons region).</p> <p>The amendments sought seek to acknowledge the highly productive land resource as part of these provisions.</p>	Add a paragraph in chapter introduction The region also includes highly productive land, a finite resource which has long-term values for land-based primary production, including for food security.
S128 Horticulture New Zealand	S128.014	Regional form, design and function introductory text	Support in part	<p>It is noted that a focus of Proposed Change 1 is to addressing the lack of urban development capacity and the interface between urban development and freshwater.</p> <p>It would be remiss in our view to not include a productive and sustainable rural environment in planning provisions regarding regional form, design and function. In particular, the RPS should protect highly productive land for food production and from reverse sensitivity.</p>	Amend, paragraph 9 (p. 79) We need to recognise and provide for other regionally significant values and features, including managing freshwater, indigenous biodiversity, highly productive land , values of significance to mana whenua / tangata whenua and management of the coastal environment.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>The NPSHPL notes that there needs to be integration in the management of HPL with freshwater management and urban development The Wellington Regional Growth Framework (WRGF) which this RPS acknowledged in their constraints analysis:</p> <ol style="list-style-type: none"> 1. highly productive land (as Wāhi Toitū) 2. high quality soils (as Wāhi Toiora). <p>The WRGF noted that the Wairarapa and Horowhenua contain important areas of highly productive land (noting the boundary of this work extended into the Horizons region).</p> <p>The amendments sought seek to acknowledge the highly productive land resource as part of these provisions.</p>	
<p>S131 Ātiawa ki Whakaron gotai Charitable Trust</p>	<p>S131.038</p>	<p>Regional form, design and function introductory text</p>	<p>Support in part</p>	<p>Ātiawa seek reference to mana whenua and our values in reference to the concept of a well-functioning urban environment, in accordance with the NPS-UF.</p>	<p>Amend to: The concept of well-functioning urban environments was introduced in the National Policy Statement on Urban Development 2020. There are a number of characteristics and qualities that contribute to forming a well-functioning urban environment. Well-functioning urban environments enhance the quality of life for residents as it is easier to get around, allows for a greater supply and choice of housing close to where people work or to public transport, and provide vibrant, safe, and cohesive centres that enhance business activity and enable Māori to express their cultural traditions and norms. Well-functioning urban environments enable communities and businesses to be more resilient to the effects of climate change, and the uptake of zero and low-carbon emission modes is supported throughout the region. Well-functioning urban environments have compact urban form and are well-designed and planned through the use of spatial and development strategies and use of design guidance. Well-functioning urban environments are low impact, incorporating water sensitive urban design and managing the effects on other regionally significant</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					values and features as identified in this RPS.
S133 Muaūpoko Tribal Authority	S133.063	Regional form, design and function introductory text	Support in part	Supports the acknowledgement of home ownership and access to affordable housing being exacerbated for Māori, however, requests specific mention of Muaūpoko.	Amend to include specific reference of Muaūpoko.
S140 Wellington City Council (WCC)	S140.026	Regional form, design and function introductory text	Support in part	Confusing introduction with unclear direction.	Clarify and refine introduction.
S147 Wellington Fish and Game Council	S147.046	Regional form, design and function introductory text	Support	Necessary to give effect to the NPS-FM	Retain as notified
S154 Investore Property Limited	S154.011	Regional form, design and function introductory text	Oppose in part	The proposed changes will not give effect the NPS-UD.	Amend Chapter 3.9 introduction to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S155 Stride Investment Managem ent Limited	S155.008	Regional form, design and function introductory text	Oppose in part	The proposed changes will not give effect the NPS-UD.	Amend Chapter 3.9 introduction to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S158 Kāinga Ora Homes and Communiti es	S158.012	Regional form, design and function introductory text	Oppose in part	Seeks that chapter focuses on the regional form, design and function of the urban and rural environments. The proposed amendments and inclusions in the chapter create a 'plan within a plan' setting, for example, Objective 22 requires 11 matters to be met for enabling an urban development. Amendments are sought to the proposed amendments for simplification and implementation. The RPS should be	Amend the chapter introduction as follows: Regional form is about the physical arrangement within and between urban and rural communities. Good urban design seeks to ensure that the design of buildings, places, spaces, and networks work well for mana whenua / tangata whenua and communities, and are environmentally responsive. Well-functioning urban environments The concept of well-functioning urban environments was introduced in the National Policy Statement on

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>read as a whole, and there is no need to include all matters that is covered across the various chapters of the RPS into one objective. The focus should be on enabling urban development, form and function, including housing and infrastructure.</p>	<p>Urban Development 2020. There are a number of characteristics and qualities that contribute to forming a well-functioning urban environment. Well-functioning urban environments enhance the quality of life for residents as it is easier to get around, allow for a greater supply and choice of housing close to where people work or to public transport, town centres are and provide vibrant, safe, and cohesive centres that enhance business activity. Well-functioning urban environments enable communities and businesses to be more resilient to the effects of climate change, and the uptake of zero and low-carbon emission modes is supported throughout the region. Well-functioning urban environments have compact urban form and are well-designed and planned through the use of spatial and development strategies and use of design guidance. Well-functioning urban environments are low impact, incorporating water sensitive urban design and managing the effects on other regionally significant values and features as identified in this RPS.</p> <p>Commercial Centres The Central Wellington city contains the central business district for the whole region. Its continued viability, vibrancy and accessibility are important to the whole region. There are also other regionally significant centres that are metropolitan centres that are an important part of the region's form and centres distribution. These centres are significant areas of transport movement and civic and community investment. They also have the potential to support new development and increase the range and diversity of activities across the region. Good quality high and medium density</p>

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					<p>housing in and around these centres, and existing and planned rapid transit stops, would provide increased housing choice and affordability. Further medium and high density development must be enabled within the fast-growing districts of the Region, being those identified in the National Policy Statement for Urban Development as tier 1 territorial authorities. If this development occurs, it will further improve housing affordability and provide for additional housing choice across the region.</p> <p>Encouraging use and development of existing centres of business activity can also lead to social and economic benefits. Additional local employment around these centres could also can provide people with greater choice about where they work and live in the region. The design of urban and rural communities/smaller centres, the region's industrial business areas, the port, the airport, the road and public transport network, and the region's open space network are fundamental to well-functioning urban environments and a regional form. Regional growth and urban development</p> <p>The Wellington Regional Growth Framework³ provides a spatial plan that has been developed by local government, central government, and iwi partners in the Wellington Horowhenua region. It sets out the key issues identified for urban growth and development and provides a 30-year spatial plan that sets a long-term vision for changes and urban development in the Wellington Region.</p> <p>The region has a strong corridor pattern, yet is</p>

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					<p>generally compact. The Wellington Regional Growth Framework identifies the three key growth corridors within the Wellington Region being the western, eastern and Let's Get Wellington Moving growth corridors. Two additional potential west-east corridors are identified. The corridors are shown in Figure 3 below.</p> <p>This corridor pattern is a strength for the region. It reinforces local centres, supports passenger transport, reduces energy use and makes services more accessible.</p> <p>[Image] [Figure 3: Wellington Regional Growth Framework]</p> <p>The region is facing growth pressure. Based on the May 2022 Wellington Regional Housing and Business Development Capacity Assessment (HBA), the Greater Wellington urban environment is expected to grow by around 195,000 people by 2051. As of May 2022, district plans within the Greater Wellington region, does not provide sufficient development capacity for the long term with a shortfall of more than 25,000 dwellings.</p> <p>In more and more areas of the region, housing is unaffordable for many people. Across the region the average rent per week increased by 24 percent between 2018 and 2021 and the average house price increased by 46 percent between 2018 and 2021. The ratio of house values to annual average household income has been steadily increasing as house prices have risen without equivalent rises in incomes. For instance, the ratio for Wellington City as at March 2021 was 6.75. Home ownership and access to affordable housing issues are exacerbated for Māori;</p>

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					<p>43 percent of Māori living in the Wellington region were living in owner occupied dwellings compared to 55 percent of the overall population⁶.</p> <p>National direction provided through the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 supports increased supply of housing that includes arange of housing typologies and sizes to assist in meeting the housing needs of the region. affordable housing. Both legislative documents direct urban intensification and development in around the urban environments, centres and existing and planned rapid transit stops, subject that there are no qualifying matters limiting development. However, high levels of development without suitable constraints risks undermining other characteristics and qualities of a well functioning urban environment. We need to recognise and provide for other regionally significant values and features, including managing freshwater, indigenous biodiversity, values of significance to mana whenua /tangata whenua and management of the coastal environment. Most of the region, including its existing urban areas, has significant exposure to multiple natural hazards, and there is continuing demand to build in coastal and/or natural hazard-prone areas.</p> <p>Medium and high-density development that is enabled through national direction has the potential to be reduced by Councils' identifying qualifying matters in their District Plan that will result in less enabled development capacity and</p>

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					<p>growth across the region result in poor urban design outcomes, in the absence of sufficient design guidance. Development pressure can reduce transport efficiency and limit the ability of all centres to provide community services and employment. Regionally significant issues The regionally significant issues and the issues of significance to the Wellington region's territorial authorities and iwi authorities for regional form, design and function are: A-1. Lack of housing supply and choice</p> <p>The Wellington Region lacks sufficient, affordable, and quality (including healthy) housing supply and choice to meet current demand, the needs of projected population growth and the changing needs of our diverse communities. There is a lack of variety of housing types and sizes across the region, including papakāinga and medium and high density residential living in and around centres and existing and planned transit nodes. All of which impacts housing affordability in the region. Housing affordability has declined significantly over the last decade, causing severe financial difficulty for many lower income households, leaving some with insufficient income to provide for their basic needs and well-being. There is a lack of supporting infrastructure to enable the development of sufficient housing and the provision of quality urban environments. 2. Lack of infrastructure There is a lack of supporting infrastructure and sufficient infrastructure to enable the development of housing and provision of quality urban environments. Enabling</p>

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					<p>housing requires infrastructure, both physical and social infrastructure to support wellfunctioning urban environments. Physical infrastructure includes roading and threewaters infrastructure. Social infrastructure includes community facilities and services, and open spaces. Territorial Authorities, network utility operators and infrastructure providers are encouraged to continue providing the additional infrastructure needed to meet the needs of current and future communities. B- 3.</p> <p>Inappropriate land use, activities and development</p> <p>Inappropriate and poorly managed urban land use and activities in parts of the Wellington region have damaged, and continue to jeopardise, the natural environment, degrade ecosystems, particularly aquatic ecosystems, and increased the exposure of communities to the impacts of climate change. This has adversely affected mana whenua/ tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. This has also led to poor quality urban environments. Clear direction is needed to where land-use and development is appropriate and where it is not appropriate. 1. Poor quality urban design</p> <p>Poor quality urban design can adversely affect public health, social equity, land values, the cultural practices and wellbeing of mana whenua / tangata whenua and communities, the vibrancy of local centres and economies, and the provision of, and access to, civic services. It can also increase the use of non-renewable</p>

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					<p>resources and vehicle emissions in the region.</p> <p>4. Out of sequence development Out of sequence Sporadic, uncontrolled and/or uncoordinated, development (including infrastructure) can adversely affect the region's compact form and function. This can, among other things, result in:</p> <ul style="list-style-type: none"> (a) new development that is poorly located in relation to existing infrastructure (such as roads, public transport, water supply, sewage and stormwater systems) and is costly or otherwise difficult to service (b) development in locations that restrict access to the significant physical resource in the region - such as aggregate (c) the loss of rural or open space land valued for its productive, ecological, aesthetic and recreational qualities (d) insufficient population densities to support public transport and other public services (e) development in locations that undermine existing centres and industrial employment areas (f) loss of vitality and/or viability in the region's central business district and other centres of regional significance (g) displacement of industrial employment activities from established industrial areas (h) adverse effects on the management, use and operation of infrastructure from incompatible land uses under, over, on or adjacent. (i) adverse effects on mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga. <p>3-5. Lack of Integration of land use and transportation</p>

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					<p>A lack of integration between land use and the region's transportation network can create patterns of development that increase the need for travel, the length of journeys and reliance on private motor vehicles, resulting in:</p> <ul style="list-style-type: none"> (a) increased emissions to air from a variety of pollutants, including greenhouse gases (b) increased use of energy and reliance on non-renewable resources (c) reduced opportunities for alternate means of travel (such as walking and cycling), increased community severance, and increased costs associated with upgrading roads (d) increased road congestion leading to restricted movement of goods and services to, from and within the region, and compromising the efficient and safe operation of the transport network (e) inefficient use of existing infrastructure (including transport oriented infrastructure).
S162 Winstone Aggregates	S162.041	Regional form, design and function introductory text	Support in part	Winstone note that this chapter and section references all of the aspects of building, growth and construction apart from the supply of the material and where that comes from. Winstone also seeks amendments to Issue 2 in the Introduction to specifically recognise the need to locally supply aggregate in order to minimise the cost of housing and infrastructure development.	<p>Retain the text recognising that development in locations that restrict access to aggregate resource is a significant issue for the region.</p> <p>Winstone seeks amendments to the Chapter Introduction to include reference to aggregates, providing a link to Objective 30 of the RPS and to make provision for the need to locally supply aggregate in order to minimise the cost of housing and road production.</p>
S167 Taranaki Whānui	S167.051	Regional form, design and function introductory text	Support in part	Cultural visibility and the expression of Taranaki Whānui as ahi kā in their areas of interest is important and needs to be articulated throughout the RPS.	<p>Insert a sentence in paragraph 2 (p.76) Well-functioning urban environments provide for the cultural visibility of mana whenua / tangata whenua to be incorporated, integrated, and expressed through design guides and opportunities.</p>

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S167 Taranaki Whānui	S167.052	Regional form, design and function introductory text	Support in part	Cultural visibility and the expression of Taranaki Whānui as ahi kā in their areas of interest is important and needs to be articulated throughout the RPS.	Amend paragraph in page 78: The region is facing growth pressure. It is important to recognise the history of impact and effects from growth and urban development on mana whenua / tangata whenua throughout the Greater Wellington region. Based on the May 2022 Wellington Regional Housing and Business Development Capacity Assessment (HBA),.....
S167 Taranaki Whānui	S167.053	Regional form, design and function introductory text	Support in part	Taranaki Whānui are Treaty partners through the Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009 and consider it necessary for NPS-UD objective 5 and policy 9 to be appropriately reflected in RPS1. Links to Method UD1 about urban design guidance	Amend the second paragraph (p.79) to reflect objective 5 and policy 9 of the NPS-UD that (objective 5) planning decisions relating to urban environments, and FDSs, take into account the principles of Te Tiriti o Waitangi and (policy 9) provisions in relation to urban environments.
S168 Rangitāne O Wairarapa Inc	S168.0158	Regional form, design and function introductory text	Support	Rangitāne o Wairarapa notes that the Introduction appropriately identifies that home ownership and access to affordable housing is exacerbated for Māori (lower ownership rates than national average). The Introduction includes reference to recognising and providing for regionally significant values and features, which includes values of significance to tangata whenua.	Retain as notified.
S4 Dom Harris	S4.005	Issue A: Lack of housing	Support in part	Significant hectareage of land in Wellington has sat vacant for close to a decade. The council should highlight this as a contributing factor and set out powers, actions that will be taken to encourage this land to be unlocked for housing.	Add reference to unlocking empty, unused and earthquake damaged land for housing.
S133 Muaūpoko Tribal Authority	S133.064	Issue A: Lack of housing	Support	Supports the acknowledgement of specific issues faced by iwi regarding urban development, including lack of variety of housing, inappropriate development effects on mana whenua and how poor-quality urban design can adversely affect cultural practices.	Retain as notified.

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S167 Taranaki Whānui	S167.054	Issue A: Lack of housing	Support in part	<p>In relation to urban environments, Taranaki Whānui support the direction of this wording on the basis that further opportunities are proffered for their involvement as required by NPS-UD: Policy 9.</p> <p>Taranaki Whānui aspires to provide housing for their own people in their areas of interest.</p>	<p>We note the three issues the NPS-UD requires the RPS to cover:• Providing for a well-functioning and liveable urban environment• Enabling and managing urban intensification• Providing for responsive planning through introducing criteria for "adding significantly to development capacity".</p> <p>Support the direction of this wording on the basis that further opportunities are proffered for their involvement as required by NPS-UD: Policy 9:</p> <p>Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:</p> <p>(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and</p> <p>(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and</p> <p>(c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and</p> <p>(d) operate in a way that is consistent with iwi participation legislation.</p>
S168 Rangitāne O Wairarapa Inc	S168.0159	Issue A: Lack of housing	Support	Rangitāne o Wairarapa support the specific reference to Papakāinga, within the context of a lack of variety of housing.	Retain as notified.
S128 Horticultur e New Zealand	S128.015	Issue B: Inappropria te	Support in part	It is noted that a focus of Proposed Change 1 is to addressing the lack of urban development capacity and the interface between urban development and freshwater.	Amend issue B. Inappropriate and poorly managed urban land use and activities in the Wellington region have damaged, and continue to jeopardise, the natural environment, result in

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		development		<p>It would be remiss in our view to not include a productive and sustainable rural environment in planning provisions regarding regional form, design and function. In particular, the RPS should protect highly productive land for food production and from reverse sensitivity.</p> <p>The NPSHPL notes that there needs to be integration in the management of HPL with freshwater management and urban development The Wellington Regional Growth Framework (WRGF) which this RPS acknowledged in their constraints analysis:</p> <ol style="list-style-type: none"> 1. highly productive land (as Wāhi Toitū) 2. high quality soils (as Wāhi Toiora). <p>The WRGF noted that the Wairarapa and Horowhenua contain important areas of highly productive land (noting the boundary of this work extended into the Horizons region).</p> <p>The amendments sought seek to acknowledge the highly productive land resource as part of these provisions.</p>	loss, fragmentation or reverse sensitivity effects on highly productive land , degrade ecosystems, particularly aquatic ecosystems, and increased the exposure of communities to the impacts of climate change. This has adversely affected mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga.
S133 Muaūpoko Tribal Authority	S133.065	Issue B: Inappropriate development	Support	Supports the acknowledgement of specific issues faced by iwi regarding urban development, including lack of variety of housing, inappropriate development effects on mana whenua and how poor-quality urban design can adversely affect cultural practices.	Retain as notified.
S162 Winstone Aggregates	S162.042	Issue B: Inappropriate development	Support in part	Winstone also notes that the chapters lists issues of significance to the Wellington region's iwi authorities, and queries whether this should refer to local and iwi authorities.	Clarify if the listed issues are for iwi authorities only, or if they are also for local authorities.
S167 Taranaki Whānui	S167.055	Issue B: Inappropriate development	Support in part	<p>In relation to urban environments, Taranaki Whānui support the direction of this wording on the basis that further opportunities are proffered for their involvement as required by NPS-UD: Policy 9.</p> <p>Taranaki Whānui aspires to provide housing for their own people in their areas of interest.</p>	We reference NPS-UD - Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and(c) provide opportunities in appropriate circumstances for Māori

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and(d) operate in a way that is consistent with iwi participation legislation.
S168 Rangitāne O Wairarapa Inc	S168.0160	Issue B: Inappropriate development	Support	Rangitāne o Wairarapa support acknowledgement of the adverse impact that inappropriate development has had on the relationship of mana whenua / tangata whenua with their culture, land, water, sites, wāhi tapu and other taonga.	Retain as notified.
S133 Muaūpoko Tribal Authority	S133.066	Issue 1: Poor quality urban design	Support	Supports the acknowledgement of specific issues faced by iwi regarding urban development, including lack of variety of housing, inappropriate development effects on mana whenua and how poor-quality urban design can adversely affect cultural practices.	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0161	Issue 1: Poor quality urban design	Support	Rangitāne o Wairarapa support acknowledgement that poor quality urban design can adversely affect the cultural practices and wellbeing of tangata whenua and communities.	Retain as notified.
S4 Dom Harris	S4.006	Issue 2: Sporadic, uncontrolled and/or uncoordinated development	Support in part	Need better planning for transport. Routes must be stood up based on expected volumes before they come on line, not after. Appropriate sequencing between transport and urban planning is required.	Appropriate sequencing between transport and urban planning is required
S16 Kāpiti Coast District Council	S16.076	Issue 2: Sporadic, uncontrolled and/or uncoordinated development	Support in part	<p>Clause 2 is outdated as it does not identify the impacts of uncontrolled or uncoordinated development that is now enabled by the MDRS.</p> <p>Subclause (a) in particular regarding development that is poorly located in relation to existing infrastructure should identify the MDRS as a contributing factor to this challenge across the urban areas of Tier 1 city and district councils into the future.</p>	<p>Amend Clause 2 - Sporadic, uncontrolled and/or uncoordinated development, as follows:</p> <p>Sporadic, uncontrolled and/or uncoordinated, development (including of infrastructure) can adversely affect the region's compact form. Medium density residential development enabled across all urban areas in accordance with the Medium Density Residential Standards by Tier 1 territorial authorities adds to this issue. This can, among</p>

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					<p>other things, result in:</p> <p>a) new development that is poorly located in relation to existing infrastructure (such as roads, public transport, water supply, sewage and stormwater systems)</p>
<p>S29 Aggregate and Quarry Association (AQA)</p>	<p>S29.001</p>	<p>Issue 2: Sporadic, uncontrolled and/or uncoordinated development</p>	<p>Support</p>	<p>It is essential that access to potential aggregate resources is not shut off. Aggregate extraction is a locationally constrained activity. It can only occur where suitable aggregate resource exists. Council planning must identify where the rock is located and protect those areas from such development and alternative land uses.</p>	<p>Retained as notified, in particular the subclause (b)</p>
<p>S128 Horticulture New Zealand</p>	<p>S128.016</p>	<p>Issue 2: Sporadic, uncontrolled and/or uncoordinated development</p>	<p>Support in part</p>	<p>It is noted that a focus of Proposed Change 1 is to addressing the lack of urban development capacity and the interface between urban development and freshwater.</p> <p>It would be remiss in our view to not include a productive and sustainable rural environment in planning provisions regarding regional form, design and function. In particular, the RPS should protect highly productive land for food production and from reverse sensitivity.</p> <p>The NPSHPL notes that there needs to be integration in the management of HPL with freshwater management and urban development The Wellington Regional Growth Framework (WRGF) which this RPS acknowledged in their constraints analysis:</p> <ol style="list-style-type: none"> 1. highly productive land (as Wāhi Toitū) 2. high quality soils (as Wāhi Toiora). <p>The WRGF noted that the Wairarapa and Horowhenua contain important areas of highly productive land (noting the boundary of this work extended into the Horizons region).</p>	<p>Retain with amendments.</p> <p>(c) the loss of rural or open space land, including, valued for its productive, ecological, aesthetic and recreational qualities, including highly productive land and it's long-term environmental, social, cultural and economic values.</p>

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				The amendments sought seek to acknowledge the highly productive land resource as part of these provisions.	
S162 Winstone Aggregates	S162.039	Issue 2: Sporadic, uncontrolled and/or uncoordinated development	Oppose in part	<p>The issues statement in the Chapter Introduction has a single reference to aggregate, but it appears under the heading 'Sporadic, uncontrolled and/or uncoordinated development'</p> <p>Winstone supports recognition of this issue and requests that the Regionally Significant Aggregate Deposits are identified along with the surrounding area as to not sterilise the resource. This includes recognition of the extraction of the resource itself but also activities that go hand in hand with quarrying such as overburden placement which needs to occur as part of the quarrying activity as it is necessary to remove and store the overburden to be able to access the aggregate below.</p> <p>Winstone request that land to be protected as regionally significant mineral deposits and should urgently be identified, mapped and set aside for that purpose in the plan so that the importance of these areas are fully recognised as such (as is anticipated by Method 52 RPS).</p>	<ul style="list-style-type: none"> Undertake mapping of Regionally Significant Aggregate Deposits to allow for their protection.
S167 Taranaki Whānui	S167.057	Issue 2: Sporadic, uncontrolled and/or uncoordinated development	Support	Taranaki Whānui support the inclusion of Issue 2 here and note the reference to the adverse effects on mana whenua.	Retain as notified.
S4 Dom Harris	S4.007	Objective 22	Support in part	Quality of housing is an objective, but there don't seem to be no policy or methods that will enforce it. Voluntary or suggested codes have failed and it is clear developers will always cut costs and corners. there must be regulation and enforcement in place to ensure quality and healthy housing	Include policies, methods to enforce/encourage enhanced quality of housing to implement the objective.
S16 Kāpiti Coast District Council	S16.077	Objective 22	Support in part	The objective proposes to introduce policy-level direction on what well-functioning urban environments are. We consider this level of detail should be deleted from the objective, with the objective retaining a high-level goal.	Amend Objective 22 to delete proposed clauses (a) - (k).

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<p>S30 Porirua City Council</p>	<p>S30.022</p>	<p>Objective 22</p>	<p>Oppose</p>	<p>Objective 22 as amended by Proposed Change 1 does not give effect to the NPS-UD, and largely just repeats requirements listed elsewhere in the RPS.</p> <p>In part, this is because it will result in a polycentric urban form rather than an urban form where intensification is located in areas which are best served by public transport and services. For example, Wellington City Centre clearly benefits from the greatest range of public transport than all other centres in the Wellington Region.</p> <p>The language in the Objective also needs to be consistent with the terminology used in the National Planning Standards which have been, or are being, implemented within the District Plans. To use different terminology is confusing and unnecessary and will result in potentially different interpretations and implementation.</p> <p>The objective lacks the necessary precision to enable its meaningful implementation. As it is drafted, it unnecessarily duplicates other objectives within the RPS which need to be considered alongside it. For instance, clause (e) is superfluous, as those objectives in the RPS need to be given effect to irrespective. Similarly clause (f) is addressed through the climate change objectives and policies.</p> <p>Terminology in the RPS also needs to be consistent with Waka Kotahi's One Network Framework (ONF) which has hierarchy for "movement" and "place" and Network Operating Frameworks (NOF).</p>	<p>Amend the objective so that it is clear what the outcome sought is, and/or reword as follows:The Wellington regional form:A. Is compact, well designed and has good accessibility between housing, employment opportunities, community services, natural spaces, and open spaces, including:1. A network and hierarchy of commercial centres which support the primacy of the Wellington city centre followed by:i. Metropolitan Centres,ii. Town Centres, iii. Local Centres; andiv. Neighbourhood Centres; iii. Local Centres; andiv. Neighbourhood Centres; 2. A Regional urban form that is integrated with existing and planned transport network;3. Commercial and industrial activities distributed in appropriate locations and in a way that supports the commercial centres hierarchy identified in A.1 above;4. More people living in, and more business and community services located in, areas that are in or near a commercial centre and/or well-served by public transport;5. Urban built environments that meet the health and wellbeing needs of people.B. Supports the competitive operation of land and development markets in ways that contribute to improved housing affordability and business activity, including:1.A variety of homes that meet the needs, in terms of type and location, of different households.2. Sufficient housing and business development capacity in the short and medium term as identified in Table 9A to RPS</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					Objective 22A.3. A range of buildings and sites in appropriate locations that provide opportunities for commercial and industrial activities in a way that achieves the commercial centres hierarchy identified in A.1 above and maintains the primacy of the Wellington city centre.C. Optimises the efficient use of existing infrastructure.
S32 Director-General of Conservation	S32.007	Objective 22	Support	This objective provides useful regional context for what constitutes well-functioning urban environments. In particular, recognition of the need to protect freshwater and meet other objectives relating to land, freshwater, coast and indigenous biodiversity is appropriate in terms of higher order documents and integrated management.	Retain as notified.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.089	Objective 22	Oppose in part	Council is concerned that this objective goes beyond the requirements of the NPS-UD, and what an RPS can specify the districts should do to give effect to NPS-UD.	Amend objective to address concerns by deleting sub clauses a-k and allowing district plans flexibility to respond to local characteristics and issues.
S79 South Wairarapa District Council	S79.016	Objective 22	Support in part	<p>The objective is not clear as to how it applies to development not intended to be managed by the National Policy Statement for Urban Development (NPS UD).</p> <p>SWDC had previously requested direction to be able to consider these matters, but not its direct application for all of them.</p> <p>It is noted that the residential, commercial and mixed use zones of all district are considered 'urban areas' in the definitions included for this plan change. Urban development, the point of the Objective, would include development in those zones or of that type in the SWDC jurisdiction.</p> <p>Competitive land markets</p> <p>The policy appears to attempt to implement 3.8 of the</p>	<p>Amend Objective 22 as follows:</p> <p>Urban development, including housing and infrastructure in tier 1, 2 and 3 urban authorities is enabled where it demonstrates the characteristics and qualities of well functioning urban environments, which:</p> <p>(a) Are compact and well designed; and</p> <p>(b) Provide for sufficient development capacity to meet the needs of current and future generations; and</p> <p>(c) Improve the overall health, well- being and quality of life of the people of the region; and</p> <p>(d) Prioritise the protection and enhancement of the quality and quantity of freshwater; and</p>

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				<p>NPS UD. The NPS UD specifically identifies those areas for which it is to which it is to apply. South Wairarapa District is not one of those areas.</p> <p>It is of concern that any and all urban development that meets the characteristics set out in (a) to (k) is required to be enabled.</p> <p>For small Councils with critical infrastructure issues and not required to provide urban land under the NPS UD in the same way. The proposed amendments will more likely lead to poor outcomes where planned development may be precluded in favour of unplanned development with significant long term infrastructure effects. This could be considered counter-intuitive given that some of the settlements in the SWDC jurisdiction are some of the highest housing costs in New Zealand, including Greytown which was recently identified as the second most behind only Queenstown.</p> <p>Our preference is that a more nuanced policy is provided that allows Council to better provide for development and where planned development is not undermined.</p> <p>Please provide an assessment of the costs and benefits on SWDC of applying the NPS UD in a manner over and above its statutory purpose. This should include affordability of rates for new and upgraded infrastructure and the cost of unanticipated development that meets the objective.</p> <p>It is unclear why the whole objective must go through the Freshwater Planning process.</p>	<p>(e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity can be met; and</p> <p>(f) Support the transition to a low- emission and climate-resilient region; and</p> <p>(g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and</p> <p>(h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and) Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and</p> <p>(j) Provide for commercial and industrial development in appropriate locations, including employment close to where people live; and</p> <p>(i) Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and</p> <p>(k) Are well connected through multi- modal (private vehicles, public transport, walking, micromobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space.For other territorial authorities, urban development, including housing and infrastructure are provided for where (a) to (i) and (k) are met and where it is identified as part of long term growth planning documents</p>

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					<p>adopted by that Council. [End of amendments to Objective 22] Or, similar relief to the same effect; AND; Any consequential amendments to give effect to the relief sought. And; Separate out matters in the objective that are required to go through the Freshwater Planning Process from those that need not.</p>
S100 Meridian Energy Limited	S100.012	Objective 22	Support	Support clause (f) of Objective 22. The transition to a low-emission economy is essential of New Zealand is to achieve its climate change goals.	Retain Objective 22 as amended by RPS Change #1 and, in particular, proposed clause (f).
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.075	Objective 22	Support	Generally supports the objectives in the 'Regional form, design and function' chapter.	Retain as notified.
S113 Wellington Water	S113.011	Objective 22	Oppose	The clause restates the RPS and is superfluous	Delete clause (e) (e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and
S115 Hutt City Council	S115.025	Objective 22	Support	No reasons provided	Retain as notified

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S118 Peka Peka Farm Limited	S118.013	Objective 22	Support in part	<p>Objective 22 seeks to enable urban development where it "demonstrates the characteristics and qualities of well-functioning urban environments, which" and then lists a range of matters. Each matter is linked with an 'and' thereby creating a requirement that urban development achieves each of the listed matters before the objective would consider the urban development to be enabled.</p> <p>Policy 1 of the NPS-UD defines a 'well-functioning urban environment'. If the objective is seeking to define a well-functioning urban environment then the definition of the NPS-UD should be the starting point. The policy has the effect of adding 11 additional aspects that would need to be addressed and satisfied to consider a proposal to be a well-functioning urban environment. This is inconsistent with the intent of Policy 1 of the NPS-UD.</p>	<p>Amend Objective 22 as follows:</p> <ul style="list-style-type: none"> • Remove the 'and' following each listed matter; • Be based on the definition of 'well-functioning urban environment' as defined in Policy 1 of the NPS-UD; and • Remove superfluous matters that are otherwise addressed by the RPS or NPS-UD.
S119 Summerse t Group Holdings Limited	S119.003	Objective 22	Support in part	<p>Objective 22 seeks to enable urban development where it "demonstrates the characteristics and qualities of well-functioning urban environments, which" and then lists a range of matters. Each matter is linked with an 'and' thereby creating a requirement that urban development achieves each of the listed matters before the objective would consider the urban development to be enabled.</p> <p>Policy 1 of the NPS-UD defines a 'well-functioning urban environment'. If the objective is seeking to define a well-functioning urban environment then the definition of the NPS-UD should be the starting point. The policy has the effect of adding 11 additional aspects that would need to be addressed to consider a proposal to be a well-functioning urban environment. This is inconsistent with the intent of Policy 1 of the NPS-UD.</p>	<p>Amend Objective 22 as follows:</p> <ul style="list-style-type: none"> • Remove the 'and' following each listed matter; • Be based on the definition of 'well-functioning urban environment' as defined in Policy 1 of the NPS-UD; and • Remove superfluous matters that are otherwise addressed by the RPS or NPS-UD.
S120 The Retirement Villages Association of New Zealand	S120.003	Objective 22	Support in part	<p>Objective 22 seeks to enable urban development where it "demonstrates the characteristics and qualities of well-functioning urban environments, which" and then lists a range of matters. Each matter is linked with an 'and' thereby creating a requirement that urban development achieves each of the listed matters before the objective would consider the urban development to be enabled.</p> <p>Policy 1 of the NPS-UD defines a 'well-functioning urban environment'. If the objective is seeking to define a well-functioning urban environment then the definition of the</p>	<p>Amend Objective 22 as follows:</p> <ul style="list-style-type: none"> • Remove the 'and' following each listed matter; • Be based on the definition of 'well-functioning urban environment' as defined in Policy 1 of the NPS-UD; and • Remove superfluous matters that are otherwise addressed by the RPS or NPS-UD.

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				NPS UD should be the starting point. The policy has the effect of adding 11 additional aspects that would need to be addressed to consider a proposal to be a well-functioning urban environment. This is inconsistent with the intent of Policy 1 of the NPS-UD.	
S124 KiwiRail Holdings Limited	S124.002	Objective 22	Support	KiwiRail supports Objective 22(c) to 'improve the overall health, well-being and quality of life of people in the region'. This objective is appropriate to give effect to Objective 1 of the NPS-UD and to recognise that providing for the health and well-being of our communities relies on having appropriate planning provisions in place, such as controls on development near the rail corridor. Providing for wellbeing of our communities also relies on having the necessary infrastructure in place to support urban development.	Retain as notified.
S125 R P Mansell; A J Mansell, & M R Mansell	S125.003	Objective 22	Support	Consistent with the intent and requirements of the NPS-UD.	Retain as notified.
S128 Horticul tural New Zealand	S128.017	Objective 22	Support in part	The RPS should protect highly productive land for food production and from reverse sensitivity. The highly productive land resource need to be acknowledged and reiterated in the text. A more explicit reference to highly productive land is warranted. It is not clear that this is currently provided for within the 'significant values and features' identified within the RPS. Strategic management of highly productive land is critical.	(e) Achieve the objectives in this RPS relating to the management of air, land (particularly highly productive land and reserve sensitivity), freshwater, coast, and indigenous biodiversity; and
S129 Waka Kotahi NZ Transport Agency	S129.046	Objective 22	Support	Supports the direction that development should only occur where it can demonstrate that the characteristics and qualities of a well-functioning urban environments are provided.	Retain as notified.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.040	Objective 22	Support in part	Objective 22 subclauses (a), (b), (c), (i) and (j) Ātiawa seeks growth that both retains the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. Housing should be supported by life sustaining infrastructure including improved public transport hubs. The tino rangatiratanga of hapū and iwi	Specific amendments are proposed in relation to underlying policies.

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				should be recognised in relation to their land and waterways, and how this can be exercised to better manage the sustainable use of these resources. The manaakitanga that iwi, hapū and ahi kā have provided over generations to share their home with Tangata Tiriti needs to be recognised in the way growth is managed. This includes recognising the significant role of Marae as a spiritual and cultural home for our people, a social hub and in civil emergencies. Proactive initiatives are required to ensure that our unique history, identity and culture is respected and given expression in the region	
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.041	Objective 22	Support	Objective 22 (d) Ātiawa are concerned that development will be enabled prior to infrastructure being established. The provision of adequate and appropriate infrastructure and the design of urban form is foundational to the delivery of housing and intensification. When grounded in and guided by the mātauranga of mana whenua the results enhance the unique identity and culture of this place. If done poorly, housing and intensification can have enduring negative impacts on the relationship of Ātiawa with our lands and waters.	Objective 22 (d) Ātiawa position is that Regional Council must ensure that infrastructure is established prior to housing development to ensure this objective is met.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.042	Objective 22	Support	Objective 22 (f) and (k) Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided. We also support a proactive approach to responding to climate change including managed retreat and increased restrictions on development in high prone flood areas. In line with this, we also support the identification of future new town centres that are removed from flood and liquefaction risk. We support development centred around public transport hubs and walkable catchments. However, the scale of that development needs to be planned and delivered in a way that recognises the rangatiratanga of hapū and iwi in relation to their land and waterways, and how this can be exercised to better manage the sustainable use of these	Objective 22 (f) and (k) Retain as notified.

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				resources. Any policy in relation to catchments and water also needs to be consistent with the hierarchy of obligations of Te Mana o te Wai, and ensure that the primary life-supporting values of freshwater, and secondary values of human rights in relation to water is provided for before other tertiary economic and social values are provided for.	
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.043	Objective 22	Support	Objective 22 subclause (g) and (h) Ātiawa supports the objective of urban development as we seek to retain the ability for our people to live in their own rohe, and create housing opportunities that attract our own people home as part of the growing population. We support the focus on existing centres where life sustaining infrastructure including improved public transport hubs are provided. We also support a proactive approach to responding to climate change including managed retreat and increased restrictions on development in high prone flood areas. In line with this, we also support the identification of future new town centres that are removed from flood and liquefaction risk.	Objective 22 subclause (g) and (h) Retain as notified.
S132 Toka Tu Ake EQC	S132.004	Objective 22	Support in part	It is important that urban development is enabled in areas which are at minimal risk from natural hazards, and that development is appropriately resilient to both current and future risks from natural hazards, accounting for the effects of climate change.	Add:1) minimise the exposure of residents to natural hazards, and account for future natural hazard risk increased by the effects of climate change
S133 Muaūpoko Tribal Authority	S133.067	Objective 22	Support	Supports the amendments to this clause to support the ability for Māori to express their cultural and traditional norms.	Retain as notified.
S134 Powerco Limited	S134.006	Objective 22	Support in part	Objective 22 appropriately recognises the development of infrastructure as key to achieving well-functioning urban environments and the intent is supported. Clause (e), however, is unnecessary as places additional weight on the objectives of the RPS relating to air, land, freshwater, coast and biodiversity, giving them additional weight for urban development proposals over and above other RPS objectives that are not listed.	Retain the intent of Objective 22, but delete clause (e) as follows: "Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning urban environments, which: ... (e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and ... "

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S137 Greater Wellington Regional Council (GWRC)	S137.029	Objective 22	Support in part	This objective is drafted more in the style of a policy rather than an outcome. Amendment to the chapeau is required to address this.	Amend Objective 22 as follows: Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning urban environments, which:
S140 Wellington City Council (WCC)	S140.027	Objective 22	Support	Support as proposed.	Retain as notified.
S147 Wellington Fish and Game Council	S147.047	Objective 22	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	amend subclause: (e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous and valued introduced biodiversity
S148 Wellington International Airport Ltd (WIAL)	S148.050	Objective 22	Oppose in part	WIAL seeks that the RPS appropriately recognises that in some situations housing developments can be appropriately constrained by the "qualifying matters" that are also set out in the National Policy Statement on Urban Development (NPS-UD) and recognised in sections 771 and 770 of the RMA. WIAL also considers that it would be appropriate for this objective to be clear in that it does not apply to regionally significant infrastructure, and rather it is referring to infrastructure (3 Waters, roading) which supports housing developments.	Amend the objective as follows: Urban development, including housing and its associated infrastructure... (L) Protects regionally significant infrastructure and its ability to operate safely and effectively. [Note: end of amendments] Otherwise delete the objective
S154 Investore Property Limited	S154.013	Objective 22	Support in part	Support the transition to a low-emission region set out in Objective 22. However, Objective 22(j) does not set out clear direction on what is 'appropriate' and 'close to where people live' could be used to support development in a wide range of locations.	Amend the provision to recognisethat intensification is to be focused around major centres and rapid transitnodes, to support the efficient use of infrastructure and createwell-functioning and sustainable urban environments.

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S155 Stride Investment Management Limited	S155.010	Objective 22	Support in part	Support the transition to a low-emission region set out in Objective 22. However, Objective 22(j) does not set out clear direction on what is 'appropriate' and 'close to where people live' could be used to support development in a wide range of locations.	Amend the provision to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S157 BP Oil NZ Ltd, Mobil Oil Ltd and Z Energy Ltd	S157.008	Objective 22	Support in part	Objective 22 appropriately recognises the development of infrastructure as key to achieving well-functioning urban environments as well as the need to provide for commercial and industrial development in appropriate locations. Clause (e), however, is unnecessary as places additional weight on the objectives of the RPS relating to air, land, freshwater, coast and biodiversity, giving them additional weight for urban development proposals over and above other RPS objectives that are not listed.	Retain the intent of Objective 22, but delete clause (e) as follows: (e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and
S158 Kāinga Ora Homes and Communities	S158.037	Objective 22	Oppose in part	Objective 22 is considered a 'plan within a plan' in that the sub-points within the objective refer to climate change resilience and freshwater management, when these issues are provided within separate, more comprehensive chapters. In addition, the associated policies link climate change and freshwater management appropriately to the objective.	Amend Objective 22 as follows: Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning urban environments, which: (a) Are compact and well designed; and (b) Provide for sufficient development capacity to meet the needs of current and future generations; and (c) Improve the overall health, well-being and quality of life of the people of the region. ; and(d) Prioritise the protection and enhancement of the quality and quantity of freshwater; and(e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and(f) Support the transition to a low-emission and climate-resilient region; and(g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and(h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and (i) Support the competitive operation of land and development markets in ways that improve

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					housing affordability, including enabling intensification; and(j) Provide for commercial and industrial development in appropriate locations, including employment close to where people live; and(k) Are well connected through multi-modal (private vehicles, public transport, walking, micro-mobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space. A compact ...
S166 Masterton District Council	S166.019	Objective 22	Support	The review of the WCDP will reflect this objective through areas of intensification - allowing for higher density and mixed use development.	Retain as notified.
S167 Taranaki Whānui	S167.058	Objective 22	Support in part	<p>Taranaki Whānui support the intent and direction of Objective 22 including the provision at (h) to enable Māori to express their cultural and traditional norms by providing mana whenua / tangata whenua and their relationship with their culture, land, water, sites, waahi tapu and other taonga. We support the intention to direct 'planning decisions relating to urban environments'.</p> <p>Taranaki Whānui understand from GWRC officers that the specific urban development provisions that reflect NPS-UD Objective 5 and Policy 9 are provided by Policies UD1 and UD2. What is lacking in these provisions is specific reference to respective Treaty relationships with mana whenua partners across the region. This is a concern for Taranaki Whānui as treaty partners and in relation to the proposed provisions.</p>	Objective 22 to be re-drafted in a way that reflects Treaty relationships in planning decisions relating to urban environments.
S168 Rangitāne O	S168.0162	Objective 22	Support in part	Rangitāne o Wairarapa support the expansion of the clause specifically relating to supporting the ability for Māori to express their cultural and traditional norms to	Amend subclause (g) of the policy to include "quality" in terms of the variety of homes that are provided for, as follows:

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Wairarapa Inc				refer to 'providing for tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga'.	(g) Provide for a variety of homes that meet the needs, in terms of quality , type, price, and location, of different households;
S16 Kāpiti Coast District Council	S16.078	Objective 22B	Support	The general intent of the objective is supported.	Retain
S30 Porirua City Council	S30.023	Objective 22B	Oppose	<p>As drafted, it is unclear what this objective means. The objective lacks the necessary precision to enable its meaningful implementation. It is unclear what sort of development should be 'strategically planned', or what 'strategically planned' means in this context. The objective should describe what the end result looks like; strategic planning is likely the method to achieve that outcome, not the outcome itself.</p> <p>The second half of the objective refers to the need to consider other objectives and policies in the RPS which is unnecessary if the RPS is read a whole as required. Further, it is unclear how use of the term 'effectively' relates to more specific direction in these policies i.e. where effects are to be avoided. The direction of 'effectively managed' is at odds with protecting significant values and features.</p>	Amend the objective so that it is clear what the outcome sought is. Provide a definition of 'strategically planned'.
S32 Director-General of Conservation	S32.008	Objective 22B	Support	This objective supports a strategic approach to development. In particular, recognition of the need to manage impacts on significant values and features is appropriate in terms of higher order documents and integrated management.	Retain as notified.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.098	Objective 22B	Support in part	Council supports the intent of this objective, insofar as the key fundamental issues within the RPS are addressed	See comments on provisions relating to the inclusion of NPS-IB provisions, throughout this submission. Clarify how NPS-HPL relates to this objective and how it is proposed to be implemented.
S79 South Wairarapa District Council	S79.017	Objective 22B	Oppose	The objective is so broad that it is meaningless. Further, the type of development in the rural area is that is most often not strategic in nature. The purpose of this objective is unclear, particularly when viewed against the relevant	Delete objective 22B And; Consult with rural communities to develop a more comprehensive, strategic and meaningful set of objectives

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				policies, and methods which are largely non-regulatory and related to water attenuation, other parts of the RPS which are already adequately covered, or thinking about matters in the future. GWRC needs to clearly identify what it is seeking to manage and why. This objective does not and can not meet any requirement of s.32 of the RMA.	and policies for the rural environment and introduce them by way of variation to this plan change.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.076	Objective 22B	Support	Generally supports the objectives in the 'Regional form, design and function' chapter.	Retain as notified.
S115 Hutt City Council	S115.026	Objective 22B	Oppose	This objective is unclear, particularly in relation to what it means to be "strategically planned". As the objective primarily supports non-regulatory methods and consideration policies, the objective seems unnecessary.	Delete new Objective 22B
S118 Peka Peka Farm Limited	S118.014	Objective 22B	Oppose in part	The objective lacks clarity as to what is meant by 'strategically planned'.	Delete Objective 22B or insert new definition for 'strategically planned'.
S125 R P Mansell; A J Mansell, & M R Mansell	S125.005	Objective 22B	Support	Consistent with the intent and requirements of the NPS-UD.	Retain as notified.
S128 Horticulture New Zealand	S128.018	Objective 22B	Support in part	The RPS should protect highly productive land for food production and from reverse sensitivity. The highly productive land resource need to be acknowledged and reiterated in the text. A more explicit reference to highly productive land is warranted. It is not clear that this is currently provided for within the 'significant values and features' identified within the RPS. Strategic management of highly productive land is critical.	Amend Objective 22B Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features identified in this RPS and highly productive land are managed effectively.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.045	Objective 22B	Support in part	Ātiawa support the rural area being strategically planned and impacts on significant values and features managed effectively. Ātiawa has an enduring whakapapa relationship with the natural and physical environment. Our values, kaupapa and taonga are our enduring platform. Our vision is for our people to be able to live their lives in	Amend as follows: Objective 22B Development in the Wellington Region's rural area is strategically planned and impacts on significant values and features, including mana whenua values

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				<p>the rohe of Ātiawa ki Whakarongotai in harmony with te taiao. This means we need to ensure the sustainable use of taonga and te taiao and that there are minimal impacts to our taonga and community through decision-making around development. Managing the effects of water supply systems, stormwater and wastewater disposal services and transport infrastructure on our cultural values is critical.</p> <p>We support a proactive approach to responding to climate change including managed retreat and increased restrictions on development in high prone flood areas. In line with this, we also support the identification of future new town centres that are removed from flood and liquefaction risk. Water is a taonga that must have its mana and wairua protected and enhanced. Ātiawa support the move away from the use of hard structures to provide storm and flood protection.</p> <p>Ātiawa seek specific reference to mana whenua values in Objective 22B to ensure they are managed effectively in the rural area in regards to development. The Trusk seek deletion of the word identified as it is not appropriate or necessary to provide an extensive list of mana whenua values in the RPS.</p>	identified in this RPS are managed effectively.
S134 Powerco Limited	S134.007	Objective 22B	Support	Objective 22B appropriately recognises the need for strategic planning of development in rural areas and is supported.	Retain as notified.
S140 Wellington City Council (WCC)	S140.028	Objective 22B	Support	Support as proposed.	Retain as notified.
S147 Wellington Fish and Game Council	S147.048	Objective 22B	Support	Necessary to give effect to the NPS-FM	Retain as notified
S163 Wairarapa Federated Farmers	S163.041	Objective 22B	Oppose	This proposed new objective relating to development in rural areas does not fit in this chapter which is focused on urban areas; and as currently structured is uncertain in its intent and application. If the intent is to manage rural residential development then the objective should be reworded to reflect this. See submission for more details.	That Objective 22B be deleted OR Insert a clause in Objective 22 to the following or similar effect: provide for rural residential development in appropriate locations

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					Delete the FW icon
S167 Taranaki Whānui	S167.059	Objective 22B	Oppose in part	Taranaki Whānui raised an issue around protections for potential future coastal marine permits and would like to work further in partnership on this objective.	Work in partnership with Taranaki Whānui to amend this objective.