

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

– Addendum 2 to Summary of Decisions Requested



N.B This document contains two tables. Table 1 shows corrections to errors made in the Summary of Decisions Requested. Table 2 shows submission points omitted from the Summary of Decisions Requested.

Table 1: Corrections to Submission Points in the Summary of Decisions Requested:

Corrections to the Summary of Decisions Requested are recorded in **red** text below and should be read in conjunction with the [Summary of Decisions Requested](#) which was notified on 5th December 2022.

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council					
S34.060	Chapter 4.1: Regulatory policies- Policy	Policy 14: Urban development effects on freshwater and the coastal marine area— regional plans-	Support in part	Council supports the policy intent and that this should apply to regional plans. However, in developing the objectives, policies, and methods including rules, GWRC must work with territorial authorities to ensure that the impacts any new provisions may have on infrastructure delivery, operation and maintenance are understood and addressed.	Retain policy as notified but acknowledge the need include a method of delivery to address the comments from Council
S30 Porirua City Council					
S30.009	Chapter 3.1A: Climate change	Objective CC.6	Oppose	Resource management and adaptation planning is the method to achieve resilience and is not required to be included in the objective itself. Thought needs to be given as to what degree of increase is being sought so that the objective is	Amend the objective so that it is clear what the outcome sought is, and/or reword as follows: Resource management and adaptation- planning increase The resilience of communities and the natural environment to the

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				measurable and certain. Otherwise, a very small increase would meet this objective, which we assume is not its intent.	short, medium, and long-term effects of climate change is increased.
S30.0115	General Comments	General Comments – Overall	Support Oppose in part	We have generally been unable to undertake redrafting as part of our submission due to the scale of redrafting required and the limited time available. In some cases, we are unclear as to the policy intent and in those circumstances, we have not been able to request any changes until we fully understand that intent. The exception is Objective 22, Policy 30 and Policy 31 of which we have requested redrafted versions.	We request that GWRC immediately commence a variation to Proposed Change 1, and meaningfully engage and work with the territorial authorities on the redrafting of the provisions. Doing so will avoid litigation through appeals and subsequent plan and consent processes.
S30.021	Chapter 3.9 Regional form, design and function	Regional form, design and function introductory text	Oppose	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. 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.	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. 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 are well connected by public and active

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					<p>transport, and which also enhance business activity. This network of centres support urban intensification¹. 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>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 focused². Its continued viability, vibrancy and accessibility are important to the whole region. There are also 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</p>

¹ Note this text was included in the Summary of Decisions Requested, however did not have the bold text formatting to indicate that this was additional text sort by the submitter.

² Note this text was included in the Summary of Decisions Requested, however the summary showed the full sentence from 'Central Wellington City...' as bold text suggesting that this whole sentence was new text sought by the submitter. The submitter only sought the addition of the text shown here in red.

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					<p>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.</p> <p>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 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.</p> <p>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.</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>

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					<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, does not provide sufficient development capacity for the long term with a shortfall of more than 25,000 dwellings.</p> <p>(...)</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 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 dDevelopment that is</p>

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					enabled through national direction has the potential to result in poor urban design outcomes, in the absence of sufficient design guidance.
S30.026	Chapter 4.1: Regulatory policies	Policy CC.2: Travel demand management plans – district plans	Oppose	<p>Council opposes this policy and seeks its deletion. The policy requirement represents a piecemeal "ambulance at the bottom of the cliff" approach. It is more effective to intervene at an earlier stage in the development process by requiring:</p> <ul style="list-style-type: none"> • Regulatory land use frameworks that manage the distribution of activities across urban environments in a way that achieve Objective 3 to the NPS-UD. • The location of urban subdivisions together with subdivision design enable people to have a choice in transport modes. • Good quality urban design that ensures new developments are laid out and/or incorporate features that encourage active and public transport usage. The policy applies equally to "out of zone" development as much as "in-zone" development, and in so doing fails to incentivise or recognise the location of developments. For example, a new office building in the Porirua Metropolitan Centre Zone is already well served by active and public transport modes yet it would be required to incur consenting costs in producing a travel demand management plan as would an "out of zone" office building in a rural zone. <p>The policy also cannot address operational issues that present barriers to active and public transport usage such as ticketing policies, fares, levels of services etc. As such it alone cannot "maximise" use of public and active transport modes.</p>	<p>Delete policy. OR</p> <p>Alternatively, amend policy so that it provides appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>Policy CC.2: Travel demand management plans Increased reliance on public transport and active transport modes - district plans</p> <p>By 30 June 2025, district plans shall include objectives, policies and rules that:</p> <p>(a) require subdivision, use and development consent applicants to provide travel demand management plans to minimise reliance on private vehicles and maximise use of public transport and active modes for all new subdivision, use and development over a specified development threshold where there is a potential for a more than minor increase in private vehicles and/or freight travel movements and associated increase in greenhouse gas emissions; and</p> <p>(b) minimise reliance on private vehicles</p>

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				<p>The policy only requires that a travel demand management plan is produced. It is silent on the implementation of such plans nor what happens if the plan fails to maximise the use of public and active modes, for example due to people's preferences.</p> <p>Travel demand management plans are just a type of method to implement the policy and should be deleted from the policy. Rather, the policy needs to be reframed to provide direction on increasing the use of public transport and active modes.</p>	
S30.038	Chapter 4.1: Regulatory policies	Policy 12: Management of water bodies – regional plans	Support in part	<p>Council supports that these matters are addressed in a regional plan in accordance with the regional council's s30 functions. However, this policy unnecessarily duplicates requirements set out already in the NPS- FM, the role of an RPS should be to articulate what national direction means at a regional level. It is unclear what value is added by the inclusion of this policy. Also, clause (g) specifies a method which is not required as this is already listed in the chapeau of the policy.</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows:</p> <p>Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, rules and/or methods that:</p> <ul style="list-style-type: none"> (a) are prepared in partnership with mana whenua/ tangata whenua; (b) achieve the long-term visions for freshwater; (c) identify freshwater management units (FMUs); (d) identify values for every FMU and environmental outcomes for these as objectives; (e) identify target attribute states that achieve environmental outcomes, and record their baseline state; (f) set environmental flows and levels that will achieve environmental outcomes and long-term visions; (g) identify limits on resource use including take limits that will achieve the target attribute states, flows and levels and include these as rules;

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					<p>(h) identify non-regulatory actions that will be included in Action Plans that will assist in achieving target attribute states (in addition to limits); and</p> <p>(i) identify non-regulatory and regulatory actions in Actions Plans required by the NPS-FM</p>
530.039	Chapter 4.1: Regulatory policies	Policy 14: Urban development effects on freshwater and the coastal marine area – regional plans	Support in part	<p>Council supports that these matters are addressed in a regional plan in accordance with the Regional Council's s30 functions.</p> <p>Council generally supports the intent of this policy. However, this policy needs to be drafted as a policy rather than a statement, and listed items need to grammatically link to the chapeau of the policy. It also duplicates a number of other policies in the RPS, for example, clause (e) duplicates Policy 15, clause (i) duplicates (and is inconsistent with) Policy 18(o).</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword as follows:</p> <p>Regional plans shall include objectives, policies, rules and methods including rules, must that give effect to Te Mana o te Wai and in doing so must:</p> <p>(a) Enable the active involvement of mana whenua/ tangata whenuain freshwater management (including decision-making processes); and</p> <p>(b) Identify and provide for Māori freshwater values are identified and provided for;</p> <p>(c) Require the control of both land use and discharge effects from the use and development of land on freshwater and the coastal marine area;</p> <p>(d) Achieve the target attribute states set for the catchment;</p> <p>(e) Require the development, including stormwater discharges, earthworks and vegetation clearance meet any limits set in a regional plan;</p> <p>(f) Require that urban development is designed and constructed using the principles of Water Sensitive Urban Design;</p> <p>(g) Require that urban development located and designed to minimise the extent and volume of earthworks and to follow, to the extent practicable, existing land contours;</p> <p>(h) Require that urban development is located</p>

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					<p>and designed to protect and enhance gully heads, rivers, lakes, wetlands, springs, riparian margins and estuaries;</p> <p>(i) Require riparian buffers for all waterbodies and avoid to the piping of rivers;</p> <p>(j) Require hydrological controls to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows;</p> <p>(k) Require stormwater quality management that will minimize the generation of contaminants, and maximise, to the extent practicable, the removal of contaminants from stormwater; and Identify and map rivers and wetlands</p>
S30.050	Chapter 4.1: Regulatory policies	Policy 29: Managing subdivision, use and development in areas at risk from natural hazards – district and regional plans	Support in part	<p>Council supports taking a risk-based approach to natural hazard management, the Proposed Porirua District Plan takes this approach which is in line with national best practice.</p> <p>It is unclear what direction is sought in terms of the use of the term 'manage' in this context. Is it to ensure that there is no increased risk to people or properties?</p> <p>In regard to (b), amending the policy to require identification of low, medium or high hazards would be consistent with a risk-based approach to hazard management. The qualifier "at least" is requested as some hazards can have a return period of greater than 1:100 years but still be considered high, medium or low hazard risk such as fault lines.</p> <p>In regard to (d) it is unclear what would constitute an "extreme" risk and how it should be managed differently from a "high" risk. Council considers that the categorisation of low, medium or high</p>	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: Regional and district plans shall include objectives, policies, rules and / or other methods that:</p> <p>(a) identify areas affected by natural hazards; and</p> <p>(b) use a risk-based approach to assess the consequences to subdivision, use and development from natural hazard and climate change impacts over at least a 100 year planning horizon, which identifies the hazards as being low, medium or high;</p> <p>(c) include objectives, policies and rules to manage subdivision, use and development in those areas where the hazards and risks are assessed as low to moderate; and</p> <p>(d) include objectives, policies and rules to avoid subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high to extreme.</p>

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				risk is consistent with a best practice risk-based approach to natural hazard management.	
S30.052	Chapter 4.1: Regulatory policies	Policy 31: Identifying and enabling a range of building heights and density – district plans	Oppose	The amendments to this policy just duplicate the requirements of the NPS-UD and do not add value in the context of the Wellington Region. It should be rewritten in line with relief sought in relation to Policy 30 to give regional guidance on the implementation of the NPS-UD. The policy should be amended to provide clear direction on how a territorial authority is to determine a walkable catchment, so that there is a consistent regional approach. The RPS should also either include a definition of a rapid transit stop, or the policy should provide clear direction as to how a rapid transit stop is determined.	<p>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows:</p> <p>Policy 31: Identifying and enabling a range of building heights and density Wellington regional form – urban intensification – district plans</p> <p>District plans shall include objectives, policies, rules and/or other methods that identify and enable urban intensification, including building heights and built form density, in a way that:</p> <ol style="list-style-type: none"> 1. For Wellington city centre: Realises as much development capacity as possible to maximise the benefits of intensification in this regionally significant centre; 2. For Metropolitan centres identified in Policy 30: Reflect demand for housing and business activity in these locations, but at a minimum, building heights of at least 6 storeys; 3. Within and adjacent to locally significant town centres identified in Policy 30 and other centres: Reflect the purpose of these centres and their planned level of commercial activities and community services; and 4. Provide for building heights of at least 6

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					<p>storeys in areas that are within a walkable catchment of the edge of the Wellington city centre, or the edge of a Metropolitan centre identified in Policy 30, or an existing or planned rapid transit stop as identified in the Regional Land Transport Plan.</p> <p>5. For any other territorial authority not identified as a tier 1 territorial authority, identify areas for greater building height and density where:</p> <ul style="list-style-type: none"> a. there is good access to existing and planned active and public transport to a range of commercial activities and community services; and/or b. there is relative demand for housing and business use in that location. <p>Explanation Policy 31 directs the identification of areas suitable for intensification across the Wellington urban environment and wider region, and the level of intensification in these areas. In so doing it gives effect to Policy 3 of the National Policy Statement on Urban Development 2020 in way that ensures that Wellington has a well-functioning urban environment and compact regional form. Policy 31 also enables greater building height and densities to be provided for in non-tier 1 territorial authorities which includes Masterton being a tier 3 territorial authority as well as Carterton and South Wairarapa. Providing for this development is consistent with Policy 5 of the National Policy Statement on Urban Development 2020.</p>

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					Include definitions for 'rapid transit stop' and 'walkable catchment'.
S30.061	Chapter 4.2: Matters to be considered	Policy CC.13: Managing agricultural gross greenhouse gas emissions – consideration	Oppose	The policy needs to be specific to regional council as the clauses relate solely to regional council functions in respect to greenhouse gas emissions.	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives; and/or reword as follows: When considering an application for a resource consent from the regional council , associated with a change in intensity or type of agricultural land use, particular regard shall be given to: (a) reducing gross greenhouse gas emissions as a priority where practicable, and (b) where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and (c) avoiding any increase in gross greenhouse gas emissions.
S30.072	Chapter 4.2: Matters to be considered	Policy 55: Providing for appropriate urban expansion – consideration	Oppose	The policy lacks the necessary precision to enable its meaningful implementation, contains unnecessary duplication, and does not align with objectives. Issues of concern include: <ul style="list-style-type: none"> • (a)(ii) repeats policies, an RPS and all its objectives and policies should be read as a whole, unless a specific objective or policy has primacy. There is also a risk in this approach of listing policies that certain policies are omitted. • In regard to (d) this goes beyond the scope of policy 8 of the NPS-UD which only applies to plan 	Amend policy so that it provides clear and appropriate direction to plan users in line with objectives, and/or reword policy as follows: When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region's urban areas (as at March 2009August 2022), particular regard shall be given to whether: (a) the urban proposed development is the most appropriate option to achieve Objective 22

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				<p>changes. Given this matter is also covered in proposed Policy UD.3, it would be better to cross-reference to policy 55 from UD.3.</p>	<p>contributes to establishing or maintaining the qualities of a well-functioning urban environment, including:</p> <p>(i) the urban development will be well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors;</p> <p>(ii) the location, design and layout of the proposed development shall achieve the objectives and policies of the RPS apply the specific management or protection for values or resources identified by this RPS, including:1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29,2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23,3. Protecting outstanding natural features and landscape values as identified by Policy 25,4. Protecting historic heritage values as identified by Policy 22,5. Integrates Te Mana o Te Wai consistent with Policy 42,6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17.7. Recognises and provides for values of significance to mana whenua / tangata whenua,8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and</p> <p>(b) the urban development is consistent with any the Wellington Region Future Development Strategy, or the regional or local strategic growth</p>

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					<p>and/or development framework or strategy that describes where and how future urban development should will occur in that district or region, should if the Future Development Strategy has not been notified under section 83 of the Local Government Act 2002 be yet to be released; and/or</p> <p>(c) a structure plan has been prepared.; and/or</p> <p>(d) Any The urban development that would provide for significant development capacity, regardless of if the development was out of sequence or unanticipated by growth or development strategies.</p> <p>Explanation</p> <p>Policy 55 gives direction to the matters that must be considered in any proposal that will result in urban development occurring beyond the region's existing urban areas. This includes ensuring that the qualities and characteristics of a well-functioning urban environment are provided for through clause (a), which includes recognising values or resources identified elsewhere in the RPS</p>
S30.093	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method FW.2: Joint processing urban development consents	Oppose	The term "urban development" is not defined nor is there a scale or other threshold to be applied before joint processing is required. As drafted, the method would capture applications that are limited notified. Policy needs to be retitled to tie in to freshwater if this is to be a FW method. Also it is unclear why joint processing would only be appropriate for urban and RSI consents, and not for large-scale rural consents.	<p>Amend method as follows"</p> <p>Method FW.2: Joint-processing of urban-development resource consents urban-development which impact on freshwater.</p> <p>When processing resource consents that may impact on freshwater, the Wellington Regional Council, district and city councils territorial</p>

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					<p>authorities shall:</p> <p>(a) jointly process notified resource consents (where both regional and district consents are publicly notified) for urban development and regionally significant infrastructure;</p> <p>(b) encourage resource consent applicants to engage with mana whenua / tangata whenua early in their planning;</p> <p>(c) collaborate on pre-application processes;</p> <p>(d) collaborate on the processing of non-notified resource consents;</p> <p>(e) collaborate on monitoring of consent conditions; and</p> <p>(f) exchange information and data to support integrated management.</p> <p>Implementation: Wellington Regional Council, district and city councils territorial authorities.</p>
S30.095	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 32: Partnering with mana whenua/tangata whenua, and	Support in part	The method as drafted omits the step before managed. Add 'identify' for consistency with Policy 27 of the RPS.	<p>Amend Method 32 (b) to include the 'identify' step for Special Amenity Landscapes as follows:</p> <p>(...)</p> <p>(b) identify and protect outstanding natural features and landscapes, and identify and manage the values of special amenity landscapes, including those with significant cultural values;</p>

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		engaging with stakeholders, landowners and the community in the identification and protection of significant values			(...)
S30.096	Chapter 4.5: Methods to implement policies (non-regulatory methods)	Method 54: Assist landowners to maintain, enhance and restore indigenous ecosystems Method 48: <u>Water allocation policy review</u>	Support in part	Policy should be timebound to increase clarity and regulatory certainty.	Amend policy so that it is timebound.

Table 2: Submission points omitted from the Summary of Decisions Requested:

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
S30 Porirua City Council					
S30.10124	Chapter 4.2: Matters to be considered	Policy CC.10: Freight movement efficiency and minimising greenhouse gas emissions – consideration	Oppose	<i>Amend policy so that it provides clear and appropriate direction to plan users in line with objectives.</i>	<i>Provide definitions for:</i> <ul style="list-style-type: none"> <i>• 'Freight-distribution centre'</i> <i>• 'Significant freight servicing requirements'</i> <i>• 'Efficient transport network'</i>
S30.0125	Chapter 4.4: Non-regulatory policies	Policy CC.15: Improve rural resilience to climate	Oppose	<i>These matters align with the Regional Council's functions under s30 with regard to discharges to air and water</i>	<i>Amend policy to clarify the regional council is responsible for supporting rural communities.</i>

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		change – non-regulatory			
S30.0126	Appendix 3: Definitions	Plantation forestry	Oppose	There is already a definition for plantation forestry in the NES-PF. To introduce a separate definition to that of the NES-PF would be confusing and potentially lead to inconsistency. Where the term plantation forestry is used in the RPS, it needs to be done so in a manner that is consistent with the NES-PF, which is a higher level RMA document than the RPS	<i>Delete definition and replace it with the definition from the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017</i>
S30.0127	Chapter 4.2: Matters to be considered	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values - consideration	Oppose	<p>The legal weight that can be given to this statement is dubious considering that it is in an explanation: “This policy shall cease to have effect once policies 23 and 24 are in place in an operative district or regional plan.”</p> <p>This policy should only apply to resource consents so it does not conflict and/or duplicate earlier regulatory policies that apply to the development of regional and district plans, as well as the NPS-IB.</p>	<i>Amend policy to include this statement, deeming provision, or advice note: This policy shall cease to have effect once policies 23 and 24 are in place in an operative district or regional plan. Amend policy to only apply to resource consents</i>
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council					
S34.0111	General Comments	General Comments – overall	Oppose in part	<p>Council has not:</p> <ul style="list-style-type: none"> undertaken a complete check of whether detailed relief sought in this submission, could be/are partly or fully addressed by other provisions in RPS PC1 	<i>Seeks any and all other amendments that will address the relief sought.</i>

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				<ul style="list-style-type: none"> undertaken a full review of background documents and higher order documents supporting or relating to these provisions identified all consequential amendments needed in response to relief sought on specific provisions or that might address our concerns 	
S34.0112	Chapter 3.6: Indigenous ecosystems	General Comments – Indigenous ecosystems	Oppose	<p>Changing Indigenous Biodiversity Provisions prior to the gazettal of the NPS-IB:</p> <p>It is noted that the NPS-IB is likely to include different assessment requirements which territorial authorities will have to give effect to, and that the NPS-IB implementation timeframes are eight years after commencement for general provisions and five years for significant natural areas.</p>	<i>Council opposes the inclusion of indigenous biodiversity provisions at this stage and submits that proposed provisions for indigenous biodiversity should be deleted in their entirety and included in a future plan change once the NPS-IB is gazetted. Should the provisions be retained, Council seeks specific relief as identified in Table 1 below³.</i>
S34.0113	General Comments	General Comments – overall	Oppose in part	<p>Use of negative rather than neutral language in issue statements:</p> <p>Council is concerned the issues are worded in strong negative language in the absence of any evidence, that Council is aware of, to support this negatively framed position, and these set a negative presumption and tone for the proposed cascading provisions.</p>	<i>Council requests the issues are amended to be written in neutral language with a balanced approach to the issue.</i>
S34.0114	Chapter 4.4: Non-regulatory policies	General Comments – Non-regulatory	Oppose in part	<p>Non-regulatory policies and methods:</p> <p>There are several non-regulatory policies and methods that appear to require a future short-to-medium term regulatory response and so cannot be</p>	<i>Council submits that these actions need to be redrafted, to make them legitimately non regulatory actions and seeks relief to specific provisions as identified in Table 1 below. Alternatively, some of</i>

³ Note table 1 refers to the table of specific submission points in the full submission.

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		policies		truly non-regulatory.	<i>these actions may need to be reclassified as regulatory with further Section 32 assessment, and Council is likely to have further comment if this occurs.</i>
S34.0115	General Comments	General Comments – overall	Oppose	Requirements for district plans to include provisions for regional council functions or that extend beyond the ability of regional council to direct: Council has significant concerns that many of the proposed provisions attempt to require city and district councils to carry out some of the functions of regional councils or require Council to address resource management issues in its district plan that are beyond its statutory functions, powers and duties under the RMA. GWRC is not able to legitimately direct these outcomes. Council considers these provisions ultra vires.	<i>Council opposes the provisions and seeks that the RPS is reviewed and amended to more appropriately and accurately reflect the powers, functions and duties of the regional, district and city councils.</i>
S34.0116	General Comments	General Comments – overall	Oppose	Lack of higher order document or evidentiary support for provisions, and policies which duplicate national direction: Many of the proposed provisions do not appear to be adequately supported within the Section 32 Assessment by robust evidence, including any existing legislation or higher-level strategic planning document such as a national policy statement. This is particularly evident for the proposed climate change and indigenous biodiversity provisions.	<i>Council submits that a full legal and planning review is undertaken to address these inconsistencies and seeks relief to specific provisions as identified in Table 1 below.</i>
S34.0117	General Comments	General Comments – overall	Oppose	Lack of consideration of scale of provisions: The requirements and evidence base to develop the thresholds require significant effort and resourcing, which Council is not in a position to undertake, and	<i>Council contends that GWRC should further consider the practicalities associated with threshold-based provisions, to determine if this is the most appropriate method to achieve an objective or policy</i>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
				in some cases, thresholds may not be an appropriate mechanism to address effects	<i>or develop guidance jointly with territorial authorities to support the development of provisions and decision-making process. Council seeks relief to specific provisions as identified in Table 1 below.</i>
S34.0118	General Comments	General Comments – overall	Oppose	Inadequacy of Section 32 Assessment: Council is concerned that the Section 32 assessment is not sufficiently evidenced and does not fully evaluate whether many of the regulatory provisions are practical / can be achieved and are the best method of achieving the outcomes sought.	<i>These provisions should be deleted and considered in a later plan change.</i>
S34.0119	General Comments	General Comments – overall	Oppose	Timing of District Plan Requirements: District plan changes are difficult and costly to resource and develop, and the need to progress in a logical sequence based on individual Councils resources. Given the difficulties recent national direction timeframes for plan changes has caused, Council does not want to see this repeated by the RPSPC1.	<i>Council submits that arbitrary timeframes should be removed from provisions in the RPSPC1 and identifies the specific provisions to which relief is sought in Table 1 below.</i>
S34.0120	General Comments	General Comments – overall	Oppose	Council considers that there are fundamental issues with the proposed provisions that require significant revision or deletion to ensure the RPSPC1 is legally robust and practical to implement. Thus, Council seeks that GWRC undertake a full legal and planning review of the proposed provisions and amend the RPSPC1 to address these concerns, including detailed submission points on individual provisions included in Table 1.	<i>Council also seeks any other consequential amendments to remedy errors and address relief sought.</i>
S34.121	Chapter 3.1A: Climate	Objective CC.7	Support in part	Whilst the non-regulatory tools promoted in this objective are supported, Council notes that the desire to implement relies heavily on the ability of	<i>Review wording of policy and amend to reflect an understanding of the barriers to implementation for our communities and support provided to allow</i>

Submission point	Plan section	Provision	Stance	Reasons	Decision requested
	change			the community to engage. It is considered that the current wording of 'understand' is patronising to our communities and disregards funding, resourcing, and other barriers which limit their ability to engage with climate change adaptation responses. We should instead be seeking to provide support to allow engagement and implementation.	<i>them to be more involved. Review policies to determine ability to engage and whether they will achieve the objective. Assist by distributing clear messaging for the region on what climate change means for the region. In order to contribute to 'understanding'</i>

- Identify list of further submitters who submitted on the above points FS That comment on PCC 30 or UHCC 34 submission points that were changed:

FS	FS points	Affected?
Kāinga Ora – Homes and Communities	s30.050	yes
Wellington City Council	s30.026	yes
Peka Peka Farm Ltd	PCC whole sub 1	yes
Meridian Energy Limited	s30.0127 s30.072	yes