

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER Proposed Change 1 to the Regional Policy Statement
for the Wellington Region Hearing Stream 3 –
Climate Change

STATEMENT OF PLANNING EVIDENCE OF MAGGIE ROSE BURNS

14 August 2023

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INTRODUCTION

1. My name is Maggie Rose Burns.
2. I hold a Bachelor of Environmental Planning from the University of Waikato. I am an intermediate member of the New Zealand Planning Institute.
3. I have been a practicing planner since 2018 and I am currently employed as a planner at Kāhu Environmental.
4. I have prepared and presented expert planning evidence on regional policy statements, district plans and resource consent applications. I have experience in assessing draft and proposed regional policy statements and regional and district plans, and assisting in preparing submissions on policy statements, plans and resource consent applications.
5. I have been involved in this matter since July 2022 and provided planning advice to Rangitāne o Wairarapa in relation to their submission on Plan Change 1 to the Greater Wellington Regional Policy Statement. I have prepared and presented evidence at Hearing Stream 2 – Integrated Management.

CODE OF CONDUCT

6. I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving oral evidence. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

MATERIAL RELIED ON

7. In preparing my evidence I have read the following:

- The Regional Policy Statement for the Wellington Region
- The material comprising Proposed Plan Change 1
- The s32 Report for PC1 where it relates to matters addressed in Hearing Stream 3
- The submissions and further submissions on PC1 made by Rangitāne o Wairarapa.
- The section 42A reports prepared for Hearing Stream 3, including:
 - Climate Change – General Topic prepared by Jerome Wyeth.
 - Climate Change – Natural Hazards Topic prepared by Iain Dawe and James Beban.
 - Climate Change – Energy, Waste and Industry Topic prepared by Jerome Wyeth.
 - Change – Climate Resilience and Nature-Based Solutions Topic prepared by Pam Guest.
 - Climate Change – Climate Resilience and Nature-Based Solutions Topic prepared by Pam Guest.

8. I have also discussed matters addressed in my evidence with Amber Craig from Rangitāne o Wairarapa. Where I rely on advice or information she has given me during those discussions, I identify that in my evidence. While Ms Craig has not prepared a statement of evidence for this hearing, she intends to appear at the hearing and will be able to answer any questions the Panel may have in relation to cultural matters addressed in my evidence.

SCOPE OF EVIDENCE

9. Rangitāne o Wairarapa have asked me to provide expert planning evidence in relation to the submission and further submissions made by Rangitāne o Wairarapa on the Wellington Regional Policy Statement – Plan Change 1 (Plan Change 1) in relation to those provisions being addressed in Hearing Stream 3.
10. Rangitāne o Wairarapa made submissions and/or further submissions on the following provisions that have been identified in the Section 42A reports as forming part of Hearing Stream 3.

Agricultural Emissions

- Policy CC.5
- Policy CC.13
- Policy CC.15
- Method CC.5

Climate Change General Topics

- Climate Change Chapter Introduction
- Definition: Carbon emissions assessment
- Definition: Climate Change Mitigation

- Climate Change Issues 1-6
- Objective CC.1
- Objective CC.2
- Objective CC.3
- Objective CC.6
- Objective CC.7
- Objective CC.8
- Policy CC.8
- Method CC.1
- Method CC.2

Energy, Waste and Industry

- Method 17
- Policy 2
- Policy 7
- Policy 11
- Policy 39

Natural Hazards

- Natural hazards chapter introduction
- Natural hazards issue 1
- Natural hazards issue 3
- Objective 19
- Objective 21
- Policy 29
- Policy 51
- Policy 52
- Policy CC.16

- Policy CC.17
- Method 14
- Method 22

Nature-Based Solutions

- Objective CC.4
- Objective CC.5
- Policy CC.4
- Policy CC.6
- Policy CC.7
- Policy CC.12
- Policy CC.14
- Policy CC.18
- Policy FW.7
- Policy FW.8
- Method CC.4
- Method CC.6
- Method CC.8
- Method CC.9

11. I have not individually addressed each of the submission points. Unless specifically addressed in my evidence, I generally agree with and support the recommendations in the Section 42A reports.
12. I have addressed and/or recommend amendments to the following provisions:
 - Objective CC.8
 - Policies 29 and 51
 - Policy CC.8
 - Policy 52
 - Method CC.4

STATUTORY CONTEXT

13. I generally agree with and rely on the statutory assessment in the Section 32 and Section 42A reports. I only restate or expand on other provisions higher order documents that are relevant to my evidence.

INCORPORATION OF SIGNIFICANT CULTURAL SITES, TAONGA SPECIES AND MĀTAURANGA MĀORI – NEW POLICY

14. The original submission from Rangitāne o Wairarapa largely supported the notified objectives and policies related to climate change and natural hazards, however it requested minor amendments to incorporate further consideration of significant cultural sites, taonga species, mātauranga and to ensure that climate change adaptation and resilience is co-designed with mana whenua/tangata whenua to utilise indigenous methods.

15. Relevant submission points include:
- Support of Objective CC.8 in part, requesting an amendment to include significant cultural sites and taonga species.
 - Support of Policies 29 and 51 in part, requesting amendments to:
 - Co-decide and engage with Tangata Whenua for these plans and support.
 - Incorporate Mātauranga into the analysis.
16. In order to address the relief sought in these submissions, I recommend an additional policy is necessary to ensure that Objective CC.8 is implemented effectively and to provide consideration of indigenous methods, particularly for natural hazard mitigation and adaptation.

Objective CC.8

[Submission points S168.0114, Climate Change General Topics - S42A report – paras 234-251]

17. The Climate Change General Topics Section 42A report agrees with the general intent of the requested amendments to Objective CC.8 in the Rangitāne submission, however, rejects the original submission point on the basis that it is too specific, and a more flexible wording is preferred to enable mana whenua/tangata whenua to determine how climate resilience is best achieved in their communities¹.
18. I disagree in part with the 42A officer's recommendation.

¹ Climate Change General Topics -S42A report, Paragraph 245
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19. In my opinion, while the objective and use of the broad term 'communities' does provide an avenue for enabling mana whenua to support aspirations to achieving climate resilience, the lack of a definition of the term leaves it open to debate in the future as to whether the notion of 'communities' extends to natural elements and relationships that are integral to the holistic individual and community identity Māori have. To address this, explicit references to include significant cultural sites and taonga species is necessary to interpret and implement Objective CC.8.
20. There is no single, strict definition of 'community' under the RMA, however it is used in various contexts, including in Part 2, Section 5. Community is generally understood as a group of people with shared interests, values and goals which extends beyond physical location to encompass social and cultural connections. This is particularly relevant for mana whenua/tangata whenua and their cultural and spiritual connections to land, water and natural resources.
21. Significant cultural sites and taonga species would not, based on my understanding, be typically thought of as being part of the Western concept of community. However, they are important elements that underpin the way in which Māori identify and interact both individually and within communities. My understanding is that in te ao Māori, everything is connected, including people and human communities with the physical and spiritual environment.

22. Cultural sites and taonga species are likely to be among the most affected by climate change. Many sites of significance will be, for example, subject to the impacts of both short- and long-term natural hazard trends. Taonga species are also particularly vulnerable to environmental changes that may be caused by climate change. Mana whenua/tangata whenua have the most authority to make decisions for these sites and species.
23. I agree with the S42A report that flexibility in allowing mana whenua/tangata whenua to decide how to best empower their own communities is appropriate and acknowledge that overly detailed reference in objectives and policies can lead to an excessively lengthy policy document. However, significant cultural sites and taonga species are key considerations for resource management and are required to be recognised and provided for under Section 6 (e) of the RMA.
24. Given there is no specific definition, it is possible that 'community' *could* include significant cultural sites and taonga species. However, explicit reference would make it clear that these are priorities for climate resilience goals for mana whenua/tangata whenua and would avoid the potential for overlooking these critical considerations.
25. I have considered the option of amending the objective itself to give effect to the relief sought in the Rangitāne submission. While it would be possible to make such an amendment, I consider that this relief, which is principally about how the objective (and the term 'community') is applied, would be more appropriately addressed through an additional policy. I consider that this approach would be an alternative means of providing the relief sought in the Rangitāne submission.

26. Policies CC.16 and CC.17 are cited in the Section 32 report as the relevant policies that implement Objective CC.8, which relate to the production of climate change adaptation plans and iwi climate change adaptation plans. While these policies are important tools to support achieving Objective CC.8, they are non-regulatory, and do not wholly implement the objective. More explicit reference to protection of significant cultural sites and taonga species that contribute to individual and community wellbeing is necessary to achieve Objective CC.8. I have provided recommended wording for an additional policy below and in Appendix A.

Policy 29 and Policy 51

[\[Submission point S168.0143, S42A report – paras 221-262 and 263-305\]](#)

27. Rangitāne o Wairarapa’s original submission supported Policies 29 and 51 in part. However, the submission requested amendments to:
- Co-decide and engage with Tangata Whenua for these plans and support.
 - Incorporate Mātauranga into the analysis.
28. The Section 42A report for Natural Hazards rejects the Rangitāne original submission point. The report suggests that there are sufficient provisions for partnering with mana whenua/tangata whenua in other areas of the plan citing Policy CC.17 and Method 22, which also directs the Council to assist mana whenua/tangata whenua in the development of iwi climate change adaptation plans².
29. I disagree with this perspective.

² Section 42A Report - Natural hazards, paragraph 254
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30. Mātauranga can provide a valuable strategic tool for natural hazard management not just for iwi, but for the wider community. Following conversations with Amber Craig from Rangitāne o Wairarapa, I understand:
- a) Mātauranga encompasses a holistic and interconnected view of the environment.
 - b) Mana whenua/tangata whenua have many generations of knowledge and understanding about local ecosystems, landscapes and natural processes and have developed adaptive practices to cope with environmental change.
 - c) Mana whenua/tangata whenua have a deep spiritual connection to the land as well as obligations as kaitiaki, which includes proactive efforts to mitigate natural hazards and in relation to climate change resilience, adaptation and mitigation.
31. By integrating mātauranga with western science, natural hazard mitigation can benefit from a more comprehensive understanding as well as empowering mana whenua/tangata whenua to increase climate resilience in their communities.
32. Mātauranga can therefore contribute to ensuring that the management of significant risks from natural hazards, as required by Section 6 (h), is achieved.
33. Policy 52 (clause (b)) includes consideration for Mātauranga Māori options for minimising adverse effects of hazard mitigation measures. I consider that mātauranga is equally relevant for natural hazard risk management and any other climate change mitigation or adaptation.

34. I acknowledge that policies should not be interpreted in a vacuum. Provisions within the RPS must work together to guide implementation and decision making. I support Policies CC.16 and CC.17; however, I consider that more explicit reference to mātauranga outside of these adaptation plans will ensure more a fulsome assessment of the use and benefits of mātauranga in comprehensive natural hazard management.
35. The additional policy will also support the outcomes sought in Objectives CC.1, CC.2, CC.6, 19, 20 and 21 as well as linking to Methods.
36. I therefore recommend an additional policy as follows:

Policy CC.X Integration of Te Ao Māori and mātauranga for Climate Change Mitigation, Adaptation and Natural Hazard Risk and Management

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, ensure that design and implementation of climate change mitigation, climate change adaption and natural hazard management:

(a) integrates Te Ao Māori and mātauranga Māori, in partnership with mana whenua/tangata whenua; and

(b) protects significant cultural sites and taonga species that contribute to the individual and community wellbeing of mana whenua/tangata whenua.

POLICY CC.8

[Submission point S168.0123, S42A report – paras 252-277]

37. The original submission from Rangitāne o Wairarapa supported Policy CC.8 and requested it was retained as notified.
38. The Section 42A report for Climate Change – General Topics accepts in part the Rangitāne original submission point and recommends various amendments to the policy, including the addition of a hierarchy to provide more direction on when offsetting greenhouse emissions is appropriate.
39. I disagree in part with the section 42A officer's recommendation.
40. I agree with the recommendation to prioritise and focus on avoiding or reducing gross greenhouse gas emissions. It is important to carefully consider the context and approach to offsetting with direct emissions reductions as a primary focus, offsetting being considered judiciously and transparently as part of a broader strategy to combat climate change.
41. I also generally agree with the prioritisation approach. However, I recommend the policy is strengthened to clarify qualifying statements that may allow decision-makers to avoid taking meaningful actions by deeming something impracticable, without providing clear justification. As notified, the way in which 'prioritisation' was to be applied would have been at the discretion of each council. The redrafted approach provides some additional direction in this regard, which should assist in achieving more consistency across the region.

42. The section 42A officer acknowledges that the use of the words 'where practicable' are often criticised for making policy direction weak but are important in this context to allow cost-consideration and other factors to be taken into account³. I acknowledge that some flexibility is necessary, however consider that 'to the greatest extent practicable' is more appropriate. The use of 'to the greatest extent practicable' indicates that there is a strong commitment and priority to providing for the matter involved, and that more than a token gesture is required (which is the risk with using only 'where practicable'). The wording provides a requirement to undertake and demonstrate how the activity has meaningfully addressed the issue, acknowledging that practical and logistical limitations exist.

43. I also recommend that 'to the extent practicable' is removed from subclause (c) in reference to increases in net greenhouse gas emissions. Net increases in greenhouse gas emissions should be avoided.

44. I therefore recommend that subclause a) to c) of Policy CC.8 are amended as follows:

45. ...

a) in the first instance, new gross greenhouse gas emissions are avoided and existing gross greenhouse gas emissions are reduced to the greatest extent practicable where practicable;

b) where gross greenhouse gas emissions cannot be avoided or reduced, a net reduction in greenhouse gas emissions is achieved to the greatest extent practicable where practicable, with any offsetting undertaken as close to the source of the greenhouse gas emissions as possible; and

c) increases in net greenhouse gas emissions are avoided-to the extent practicable.

POLICY 52

[Submission point S168.0127, Natural Hazards S42A report – paras 306-348]

46. The original submission from Rangitāne o Wairarapa supported Policy 52 in part but requested amendments to:
- delete the text ‘or suitably innovative solution’.
 - include reference to ‘taonga species’ in sub-clause (e);
 - to make clause (f) inclusive of other sites of significance which may not be ‘identified in a planning document’.
 - use terminology consistent with the NPS IB, i.e., ‘indigenous biodiversity’, rather than “local indigenous ecosystem and biodiversity”.
47. The Natural Hazards Section 42A report rejects the Rangitāne original submission point citing that clause (b), (e) and (f), (which reference mātauranga Māori, consideration of adverse effects on local indigenous ecosystems and biodiversity and recognizing sites or areas of significance to tangata whenua) adequately address this submission point⁴.
48. The Natural Hazards Section 42A report rejects the submission’s request to make clause (f) inclusive of other sites of significance which may not be identified in a planning document. The amendment to remove ‘or suitably innovative solution’ has been accepted.

⁴ Natural Hazards Section 42A – Paragraph 344
Maggie Rose Burns

Sites of Significance

49. I largely agree with the 42A officer's recommendation with regard to this policy, however, I have outstanding concerns with the restriction to only include sites of significance 'identified in a planning document...' This wording does not consider where sites may be identified through a consenting or designation process. The Section 42A report suggests that including *any* sites of significance is too broad to include in the policy and notes that many sites of significance are now scheduled in the Natural Resources Plan for the Wellington Region (NRP)⁵.
50. While there has been effort to include many sites of significance in the NRP, there are still many sites that are not documented or identified. The NRP also primarily focusses on freshwater and sites in the coastal marine area, not land-based sites. Many of these sites may not be identified until a resource consent or designation process occurs through engagement with mana whenua/tangata whenua. If a site is identified by mana whenua/tangata through a resource consent or designation process, Policy 52 should provide the same level of consideration to that site as to sites that have been previously identified. The timing of site identification does not necessarily indicate value.
51. From conversations with Amber Craig from Rangitāne o Wairarapa I understand there may be reasons why mana whenua/tangata whenua may not have been prepared to disclose the exact locations of significant sites, or record them in a public document, fearing that sites could be compromised, exploited or desecrated if they are widely known. This is compounded by historical grievances.

⁵ Natural Hazards Section 42A – Para 345
Maggie Rose Burns

52. I recommend retaining the reference to planning documents identified by an iwi authority and lodged with a local authority or scheduled in a district or regional plan, but suggest the policy is amended with the addition of 'including those.' It is helpful to retain references to sources of information, including iwi management plans, but the proposed amendment ensures the policy also applies to those sites of significance that are not currently identified in existing published documents.
53. Section 6(e) of the RMA requires the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga is recognised and provided for. There is no qualifier in Section 6(e) for waahi tapu and other taonga to be identified in a document in order to be protected.
54. I therefore recommend subclause (f) is amended as follows:
- (f) sites of significance to mana whenua/tangata whenua including those identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a ~~city~~, district or regional plan;*

Taonga Species

55. The section 42A report does not specifically address the relief sought in the Rangitāne submission to add 'taonga species' to subclause (e) of Policy 52. The requested amendment has not been made in the recommended provisions included with the s42A report.

56. Since Plan Change 1 was notified, the National Policy Statement for Indigenous Biodiversity (NPSIB) has been gazetted. Given the timing, there is no requirement to give full effect to the NPSIB, however, amendments can and should be made insofar as they are in line with the scope of submissions. I consider there is an opportunity in this case to give effect to the gazetted version of the NPSIB.
57. The NPSIB has moved away from the use of Te Rito o te Harekeke as a fundamental concept. I therefore recommend it is deleted from the subclause. I note there are other references to Te Rito o te Harekeke throughout Plan Change 1. While I have not identified them in this statement of evidence, I would support amendments being made to those other provisions to bring them into line with the NPSIB.
58. The objective of the NPSIB includes:

(1) The objective of this National Policy Statement is:

a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and

b) to achieve this:

- i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and

...

Policy 2 also states:

Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:

- a) *managing indigenous biodiversity on their land;
and*
- b) *identifying and protecting indigenous species,
populations and ecosystems that are taonga; and*
- c) *actively participating in other decision-making
about indigenous biodiversity.*

59. The NPSIB introduces the term 'acknowledged and identified taonga' in Clause 3.19. The clause requires that territorial authorities work in partnership with tangata whenua of any rohe in their district, using an agreed process, to determine the indigenous species, populations and ecosystems in that rohe that are taonga. The clause is also explicit that local authorities must recognise that tangata whenua have the right not to determine the indigenous species, populations and ecosystems in their rohe that are taonga, and to choose the level of detail at which any acknowledged taonga, or their locations or values are described. Similarly, to the protection of information on locations of sites of significance, mana whenua/tangata whenua should have tino rangatiratanga over their information. This includes taonga species. Clause 3.19 (2) of the NPSIB acknowledges this right.

60. As quoted in the evidence of Michael Joseph Kanawa for the hearings related to the Proposed Natural Resources Plan, “the relationship between Rangitāne and its resources (including taonga species) is one of paramount significance to the very being of Rangitāne as people (evidence of Amber Craig for Plan Change 1, Hearing Stream 2 – paragraph 34). Non-indigenous species are not typically considered taonga species, however, there are distinct benefits in acknowledging both indigenous biodiversity and taonga species in this clause. Recognising these species respects the knowledge that mana whenua/tangata whenua have and empowers mana whenua/tangata whenua to continue their role as kaitiaki.
61. I therefore recommend that the policy is amended to include taonga species. This will include those that may be acknowledged and/or identified taonga, or if a decision is made not to acknowledge or identify, it captures these populations and ecosystems as required by Policy 2 of the NPSIB.
62. I therefore recommend the following amendments:
- (e) adverse effects on Te Mana o te Wai, mahinga kai, ~~Te Rito o te Harakeke~~, natural processes, taonga species or ~~the local indigenous ecosystems~~ and biodiversity;*

METHOD CC.4

[Submission point S168.0151, Climate Change Resilience and Nature-Based Solutions S42A report – paras 329-345]

63. Rangitāne o Wairarapa’s original submission supports Method CC.4 in part, requesting amendments to:
- specify a timeframe of 2024 to have the regional forest spatial plan in place;
 - make specific reference to partnering with mana whenua/tangata whenua to prepare the regional forest spatial plan;
 - include a specific provision to monitor the effectiveness and efficiency of implementing the plans.
64. The Section 42A report accepts the original submission from Rangitāne and recommends several amendments.

65. I largely agree with the proposed amendments in the Section 42A report, however, recommend a minor change to recognise the status of mana whenua/tangata whenua.
66. The partnership directive in the context of mana whenua/tangata whenua acknowledges the unique role of indigenous peoples and the cooperative and mutually beneficial relationship between mana whenua/tangata whenua and the Crown. Section 8 of the Resource Management Act 1991 requires that principles of the Treaty of Waitangi are taken into account, including the principle of partnership.
67. I do not consider that partnership arrangements are exclusive to mana whenua/tangata whenua and acknowledge that engagement with other stakeholders will be important in the development and implementation of regional forest spatial plans. I consider that a minor amendment to this policy will ensure that appropriate partnership arrangements are provided for which do not undermine partnership arrangements with mana whenua/tangata whenua.
68. I also recommend that the method is amended to refer to mana whenua/tangata whenua in order to be consistent with the other provisions in Plan Change 1.
69. I recommend that the method is amended as follows:

Method CC.4 Prepare a regional forest spatial plan

By December 2024, prepare a regional forest spatial plan, ~~Using~~ a partnership approach with mana whenua/tangata whenua and, where appropriate, other key stakeholders, to identify where to promote and support planting and natural regeneration of permanent forest and associated browsing pest animal control, including how to give effect to Objective CC.5 and address contribute to achieving water quality targets for sediment, to inform the requirements of Policy CC.6.

This plan to include:

- a) a target for an increase in permanent forest extent in the Wellington Region to support achieving Objective CC.5,*

- b) *evaluation of the potential impacts of increased afforestation on rural production and social well-being, and development of an approach that will maximise the environmental, social, and economic benefit.*
- c) *ways to implement and support capability for increasing the area of indigenous forest, including the provision of incentives.*
- d) *identification of the types of indigenous forest to prioritise for reforestation, including links to the strategic indigenous biodiversity targets and priorities identified through Policy IE.3 and Method IE.3, and*
- e) *a process to monitor and report on changes in the extent and health of permanent forest.*

Implementation: Wellington Regional Council, city and district councils at their discretion*

CONCLUSION

70. My evidence has addressed the submission and further submission from Rangitāne o Wairarapa on provisions relating to Hearing Stream 3 for Plan Change 1. I have provided a full suite of recommended amendments in Appendix A.

Signature of Maggie Rose Burns

Dated 14 August 2023



Maggie Rose Burns

APPENDIX A: PROPOSED WORDING AMENDMENTS

Provision	Notified Drafting	42A Recommendation	Recommended Wording
New Policy CC.X	N/A	N/A	<p data-bbox="1588 371 1980 576"><u>Policy CC.X Integration of Te Ao Māori and mātauranga for Climate Change Mitigation, Adaptation and Natural Hazard Management</u></p> <p data-bbox="1588 624 1980 1007"><u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, ensure that design and implementation of climate change mitigation, climate change adaption and natural hazard management:</u></p> <p data-bbox="1588 1046 1980 1125"><u>(a) integrates Te Ao Māori and mātauranga Māori, in</u></p>

partnership with mana
whenua/tangata whenua; and

(b) protects significant cultural
sites and taonga species that
contribute to the individual
and community wellbeing of
mana whenua/tangata
whenua.

Policy CC.8

**Policy CC.8: Prioritising
greenhouse gas emissions
reduction over offsetting –
district and regional plans**

District and regional plans shall
include objectives, policies, rules
and/or methods to prioritise reducing
greenhouse gas emissions in the first
instance rather than applying
offsetting, and to identify the type
and scale of the activities to which
this policy should apply.

Explanation: This policy recognises
the importance of reducing gross
greenhouse gas emissions as the first
priority, and only using carbon
removals to offset emissions from
hard-to-abate sectors. Relying heavily

**Policy CC.8: Prioritising ~~the~~
reduction of greenhouse gas
emissions ~~reduction over offsetting~~
– district and regional plans**

~~District and regional plans shall include
objectives, policies, rules and/or
methods to prioritise reducing
greenhouse gas emissions in the first
instance rather than applying offsetting,
and to identify the type and scale of the
activities to which this policy should
apply. prioritise reducing greenhouse gas
emissions by applying the following
hierarchy in order:~~

- ~~a) in the first instance, gross
greenhouse gas emissions are
avoided or reduced where
practicable; and~~

**Policy CC.8: Prioritising ~~the~~
reduction of greenhouse gas
emissions ~~reduction over offsetting~~
– district and regional plans**

~~District and regional plans shall include
objectives, policies, rules and/or
methods to prioritise reducing
greenhouse gas emissions in the first
instance rather than applying
offsetting, and to identify the type and
scale of the activities to which this
policy should apply. prioritise reducing
greenhouse gas emissions by applying
the following hierarchy in order:~~

- ~~a) in the first instance, new gross
greenhouse gas emissions are~~

on offsetting will delay people taking actions that reduce gross emissions, lead to higher cumulative emissions and push the burden of addressing gross emissions onto future generations.

- b) where gross greenhouse gas emissions cannot be avoided or reduced, a net reduction in greenhouse gas emissions is achieved where practicable, with any offsetting undertaken as close to the source of the greenhouse gas emissions as possible; and
- c) increases in net greenhouse gas emissions are avoided to the extent practicable.

Explanation: This policy recognises the importance of reducing gross greenhouse gas emissions as the first priority, then reducing net greenhouse gas emissions, then avoiding increases in net greenhouse gas emissions to the extent practicable. and only using carbon removals to offset emissions from hard-to-abate sectors. Relying heavily on net-emissions through offsetting will delay people taking actions that reduce gross emissions, lead to higher cumulative emissions and push the burden of addressing gross emissions onto future generations.

The intent is that Wellington Regional Council will work with city and district councils to provide coordination and guidance as to how to implement this

avoided and existing gross greenhouse gas emissions are reduced to the greatest extent practicable where practicable;

- b) where gross greenhouse gas emissions cannot be avoided or reduced, a net reduction in greenhouse gas emissions is achieved to the greatest extent practicable where practicable, with any offsetting undertaken as close to the source of the greenhouse gas emissions as possible; and*
- c) increases in net greenhouse gas emissions are avoided to the extent practicable.*

Explanation: This policy recognises the importance of reducing gross greenhouse gas emissions as the first priority, then reducing net greenhouse gas emissions, then avoiding increases in net greenhouse gas emissions to the

policy, to ensure regional and district plan provisions to reduce greenhouse gas emissions from key emitting sectors in the region are co-ordinated and also complement national policy and initiatives. This work will consider issues such as scale, equity, and the type of activities to which offsetting should apply.

~~extent practicable, and only using carbon removals to offset emissions from hard to abate sectors.~~ Relying heavily on net-emissions through offsetting will delay people taking actions that reduce gross emissions, lead to higher cumulative emissions and push the burden of addressing gross emissions onto future generations.

The intent is that Wellington Regional Council will work with city and district councils to provide coordination and guidance as to how to implement this policy, to ensure regional and district plan provisions to reduce greenhouse gas emissions from key emitting sectors in the region are co-ordinated and also complement national policy and initiatives. This work will consider issues such as scale, equity, and the type of activities to which offsetting should apply.

Policy 52

Policy 52: Minimising adverse effects of hazard mitigation measures – consideration

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

- a) ~~the need for structural protection works or hard engineering methods;~~
- b) whether non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options provide a more appropriate or suitably innovative solution;
- c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard management strategy that

Policy 52: Minimising adverse effects of hazard mitigation measures – consideration

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- b) whether non-structural nature-based solutions, Mātauranga Māori green infrastructure, room for the river or soft engineering options provide a more appropriate ~~or suitably innovative solution;~~
- c) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard management strategy agreed to by relevant authorities that represents the best practicable option for the future;

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- represents the best practicable option for the future;
- d) the long-term viability of maintaining the structural protection works with particular regard to how climate change may increase the risk over time;
- e) adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or the local indigenous ecosystem and biodiversity;
- f) sites of significance to mana/tangata whenua identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a city, district or regional plan;
- g) a no more than minor increase in risk to nearby areas as a result of changes to natural processes from the hazard mitigation works;
- h) the cumulative effects of isolated structural protection works;
- d) the long-term viability of maintaining the structural protection works with particular regard to how climate change may increase the risk over time;
- e) adverse effects on Te Mana o te Wai, mahinga kai, Te Rito o te Harakeke, natural processes, or ~~the local~~ indigenous ecosystems and biodiversity;
- f) sites of significance to mana ~~whenua~~/tangata whenua identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a ~~city~~, district or regional plan;
- g) a no more than minor increase in risk to nearby areas as a result of changes to natural processes from the hazard mitigation works;
- h) the cumulative effects of isolated structural protection works;
- i) any residual risk remaining after mitigation works are in place,
- d) the long-term viability of maintaining the structural protection works with particular regard to how climate change may increase the risk over time;
- e) adverse effects on Te Mana o te Wai, mahinga kai, ~~Te Rito o te Harakeke~~, natural processes, ~~taonga species~~ or ~~the local~~ indigenous ecosystems and biodiversity;
- f) sites of significance to mana ~~whenua~~/tangata whenua including those identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a city, district or regional plan;
- g) a no more than minor increase in risk to nearby areas as a result of changes to natural processes from the hazard mitigation works;
- h) the cumulative effects of isolated structural protection works;
- so that they minimise ~~reduce~~ and do not increase the risks from ~~of~~ natural hazards.

i) any residual risk remaining after mitigation works are in place,

so that they minimise reduce and do not increase the risks from of natural hazards.

Explanation

Policy 52 recognises that the effects of hard protection structures can have adverse effects on the environment, increase the risks from natural hazards over time and transfer the risks to nearby areas. It provides direction to consider lower impact methods of hazard mitigation such as non-structural, soft engineering, green infrastructure, room for the river or Mātauranga Māori options, that may be more appropriate providing they can suitably mitigate the hazard.

Objective 19 seeks to reduce the risks and consequences from natural hazards, while Objective 20 aims to ensure activities, including hazard mitigation measures, do not increase the risk and consequences from natural

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hazards. Policy 52 promotes these objectives:

Having established there is a need for protection works, nonstructural and soft engineering methods should be the first option for hazard mitigation. Soft engineering methods may include, for example; hazard avoidance or controlled activity zones; setback or buffer distances; managed retreat or land retirement; a 'do nothing' policy; restoration projects for wetlands, dunes or hillslopes prone to flooding, slipping or erosion.

Activities such as river bed gravel extraction which may assist in the avoidance or mitigation of natural hazards are also a consideration under this policy.

Structural measures or hard engineering methods can have significant environmental effects and should be considered as the least desirable option for natural hazard control. Where there is an unacceptable risk to development or property, there may be a place for structural measures or hard engineering methods, if they are part of a long-term hazard management strategy that

includes other measures. Policy 51 will need to be considered alongside policy 52(c) when deciding whether a development faces an unacceptable risk or not.

The risk that remains after protection works are put in place is known as the residual risk. Stopbanks, seawalls, and revetments and other engineered protection works can create a sense of security and encourage further development. In turn, this increases the extent and value of assets that could be damaged if the protection works fail or an extreme event exceeds the structural design parameters.

Method CC.4

Method CC.4: Prepare a regional forest spatial plan

Using a partnership approach, identify where to promote and support planting and natural regeneration of forest, including how to address water quality targets for sediment, to inform the requirements of Policy CC.6. Implementation: Wellington Regional Council* and city and district councils

Method CC.4 Prepare a regional forest spatial plan

By December 2024, prepare a regional forest spatial plan, ~~U~~using a partnership approach with mana whenua and other key stakeholders, to identify where to promote and support planting and natural regeneration of permanent forest and associated browsing pest animal control, including how to give effect to Objective CC.5 and address contribute to achieving water quality targets for sediment, to inform the requirements of Policy CC.6.

Method CC.4 Prepare a regional forest spatial plan

By December 2024, prepare a regional forest spatial plan, ~~U~~using a partnership approach with mana whenua/tangata whenua and, where appropriate, other key stakeholders, to identify where to promote and support planting and natural regeneration of permanent forest and associated browsing pest animal control, including how to give effect to Objective CC.5 and address contribute to achieving water quality

This plan to include:

- a) a target for an increase in permanent forest extent in the Wellington Region to support achieving Objective CC.5,
- b) evaluation of the potential impacts of increased afforestation on rural production and social well-being, and development of an approach that will maximise the environmental, social, and economic benefits,
- c) ways to implement and support capability for increasing the area of indigenous forest, including the provision of incentives.
- d) identification of the types of indigenous forest to prioritise for re-afforestation, including links to the strategic indigenous biodiversity targets and priorities identified through Policy IE.3 and Method IE.3, and
- e) a process to monitor and report on changes in the extent and health of permanent forest.

Implementation: Wellington Regional Council*, city and district councils at their discretion

targets for sediment, to inform the requirements of Policy CC.6.

This plan to include:

- a) *a target for an increase in permanent forest extent in the Wellington Region to support achieving Objective CC.5,*
- b) *evaluation of the potential impacts of increased afforestation on rural production and social well-being, and development of an approach that will maximise the environmental, social, and economic benefit.*
- c) *ways to implement and support capability for increasing the area of indigenous forest, including the provision of incentives.*
- d) *identification of the types of indigenous forest to prioritise for reafforestation, including links to the strategic indigenous biodiversity targets and priorities identified through Policy IE.3 and Method IE.3, and*
- e) *a process to monitor and report on changes in the extent and health of permanent forest.*

Implementation: Wellington Regional Council, city and district councils at their discretion*

