



28 October 2022

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Tēnā koe e Nigel,

Proposed Change 1 to the Regional Policy Statement for the Wellington Region: Masterton District Council Submission

Thank you for the opportunity to make a submission on the proposed Change 1 to the Regional Policy Statement for the Wellington Region (RPS Change 1) and also granting Masterton District Council (MDC) an extension to the 28 October 2022.

We also extend our thanks to GWRC staff Matthew Hickman and Natasha Tomic for their presentation to our new council on the RPS Change 1.

MDC wishes to be heard in support of this submission.

The following section contains our overall comments on the RPS Change 1. Further detail is included in Attachment 1 (from page 4 of this submission).

Overall Comments

Context for the RPS Change 1

1. We acknowledge that the RPS Change 1 aims to address issues relating to urban development, freshwater, climate change and biodiversity, and that there are NPS-UD drivers to have a new RPS in place.
2. As per the submission we made as part of the limited release consultation in July 2022, the GWRC needs to provide further clarity on how and when further changes will be made to the RPS in response to other work happening both regionally and nationally as they affect MDC and its communities.
3. In particular we are aware that the RPS Change 1 partially implements the NPS-FM with further changes to come in 2023-24. What do further RPS changes look like in response to the Whaitua implementation plans (if any), the completion of relevant National Policy Statements (e.g., NPS-HPL), and government reforms that directly affect local government (e.g., three waters and the future of local government).

How the RPS is applied to Councils across the Greater Wellington Region

4. We want to reiterate that MDC has concerns about how the RPS Change 1 is applied and implemented across Councils in the Greater Wellington Region.
5. There are several proposed changes that appear to be more applicable to, or more readably implemented by Tier 1 Councils.

6. We have asked for clearer differentiation in the RPS Change 1 of roles/ responsibilities/ expectations for Tier 1 and Tier 3 Councils. What many of these policies and methods could look like in practice may have significant unintended consequences and costs for our communities.
7. While we recognise that this is an RPS for the Greater Wellington Region, it is very metro-centric and does not always recognise sub-regional and district level differences. For example, public transport in the Masterton District and throughout the Wairarapa is significantly limited in comparison to the Hutt, Wellington, and Porirua regions. As part of our Masterton District Climate Action Plan, we welcome objectives and policies that will help us improve public and active transport in the district through promoting mode shift and enabling the uptake of low-emission transport. However, we are concerned about the pressure and resourcing it puts on rural provincial councils.

MDC involvement in the development of RPS related regional plans and policies

8. MDC asks for a lead role in the development of RPS related regional plans and policies, and particularly those that relate to increasing regional forest extent, reducing methane emissions, and increasing rural resilience to climate change.
9. We share the concerns of other submitters that the RPS Change 1 could enable afforestation to be applied disproportionately in the Wairarapa.
10. To ensure that the Wairarapa doesn't become the "carbon sink" for the Wellington Region, MDC requests to be part of developing the regional Forest Management Spatial Plan. In addition to this, we want our communities that will be affected by the regional forest spatial plan, to be part of its development.

Inclusion of Climate Change in the RPS

11. We support embedding climate action into the RPS Change 1 now rather than waiting for future national direction, and in particular parts of the RPS Change 1 that align with our Masterton District Climate Action Plan. An example of this is support for community engagement and education around climate action.
12. We want to acknowledge that although the greenhouse gas emission reduction targets align with the IPCC targets, they appear more aspirational than the targets set in the Climate Change Response (Zero Carbon) Amendment Act, and this concerns parts of our rural community.
13. Because parts of our local economy are reliant on agriculture and transport for its survival, we need to identify options for how we 'contribute' towards the overall targets as the Greater Wellington Region as opposed to burdening our small rural provincial areas at a district level.

Freshwater, urban development and biodiversity

14. There are aspects of the RPS Change 1 regarding freshwater, urban development, and biodiversity that we are submitting in support of, those that we are neutral on, and also things that require further clarity and/or amendments. Key areas that we support include agreement that mana whenua/tangata whenua values are given effect to in decision-making and that they are supported to exercise their kaitiakitanga for indigenous biodiversity. In addition to this, we support policy and consenting pathways that facilitate water resilience through on-site water storage.

15. The RPS Change 1 contains 'grey' areas that require further thinking in terms of what the RPS Change 1 means in practice for MDC and our communities. For example, further work on the practicalities of the joint processing of consents.

Refer to Attachment 1 for more detail of our submission.

In closing, thank you again for the opportunity to submit as part of this process.

Nāku noa, nā

A handwritten signature in black ink, appearing to read 'D. Hopman', with a stylized flourish at the end.

David Hopman
Chief Executive
Masterton District Council

ATTACHMENT 1: Proposed Change 1 to the Regional Policy Statement for the Wellington Region Submission from Masterton District Council

Provision	Support/Oppose	Decision Sought	Reasons
OBJECTIVES			
Overarching Objective A	Support	Further clarity is needed to explain what this looks like in practice, and what guidance will be provided to district councils.	<p>We support the need for a better integrated system informed by te ao Māori and mātauranga Māori.</p> <p>More detail is required as to how the regional and district councils will undertake this work.</p>
Objective CC.1	Support in principle	<p>Further information needed to understand how this will work in practice.</p> <p>Do not support having district level overall responsibilities for targets.</p>	<p>Support in principle but have concerns about how this will work and affect parts of our economy and community.</p> <p>We can contribute, but can't at a district level, have overall responsibilities for these targets.</p> <p>This may be achievable in a Tier 1 Council area, but for a rural area in the Tier 3 category (NPSUD) this may not be achievable because of the economy being reliant heavily on agriculture and transport for its survival.</p>
Objective CC.2	Neutral	Further clarity is needed for how the TA's will be expected to implement this Objective.	<p>Objective CC.2 is difficult to implement as a Tier 3 authority.</p> <p>There needs to be equity across the region in this approach.</p>
Objective CC.3	Neutral	More clarity is needed to understand how provincial areas will contribute to these reductions.	<p>Reducing greenhouse gas emissions in the region is supported.</p> <p>Clarification needed on what happens if targets are not met or if these targets will limit individual activity.</p> <p>We are currently interpreting these are regional targets rather than activity targets. This needs to be further clarified by the GWRC.</p>
Objective CC.4	Support in part, oppose in part	All councils need to ensure that they have their own nature-based solutions, and that enforcement needs to be equitable across the region.	Will look at how this can be reflected as part of the review of the Wairarapa Combined District Plan.

		Request a clearer definition of nature-based solutions be included.	<p>Noting specifically, it is about better preparation for the predicted impacts of climate change, so long as the 'nature-based' solutions aren't disproportionately in the Wairarapa (Carbon Sink Mitigation).</p> <p>Agree in principal, but guidance is needed as to what the nature based solutions to climate change will be and why they would be chosen over other types of solutions.</p> <p>Clarity needed on what 'integral' means in this context.</p>
Objective CC.5	Neutral	MDC asks that it has a lead role in the development of any plans or policies relating to the increase of permanent forest in the Wellington Region, particularly in the Masterton District.	<p>Concerns that afforestation will be used disproportionately in the Wairarapa.</p> <p>The Wairarapa is not an offsetting zone for the rest of the Wellington Region.</p>
Objective CC.6	Support	MDC requests involvement in the development of any plans or policies relating to adaptation planning, particularly in the Masterton District.	Building community resilience to climate change is one of the main aims of our newly established Climate Action Plan so we are supportive of this objective.
Objective CC.7	Support	Support proposed content.	Increasing public education around climate change issues and solutions is one of the main actions of our newly established Climate Action Plan so we are supportive of this objective.
Objective CC.8	Neutral	Support proposed content.	<p>Support Iwi and hapū being empowered to make decisions to achieve climate-resilience in their communities.</p> <p>We believe this objective is an important step in enabling our Council to build a partnership approach to climate change mitigation and adaptation with mana whenua.</p>
Fresh water chapter 3.4 introduction	Neutral	<p>Suggest the following amendments to this paragraph (in bold and strikethrough):</p> <p><i>There are eight seven major discharges of treated sewage to fresh water in the region – one from the treatment plant at Paraparaumu, one from Rathkeale College in Masterton, with the rest from the Wairarapa towns of Masterton, Castlepoint, Carterton, Greytown, Featherston and Martinborough.</i></p>	Rathkeale College does not discharge anymore.

Objective 16	Support in part, oppose in part	MDC requests involvement in the development of any plans or policies relating to this objective.	Support in part (our interpretation of the Objective's intention). Oppose in part due to possible unforeseen implications for TAs roles and responsibilities which could be unaffordable for our community. What it looks like in practice could have significant consequences and costs.
Objection 16A	Support	Support proposed content.	Support this objective – but further work is required to understand the cost implications and what affordability impacts this may have on our communities.
Objective 16B	Support	Support proposed content.	Agree that mana whenua / tangata whenua values are given effect to in decision making and they are supported to exercise their kaitiakitanga for indigenous biodiversity.
Objective 16C	Support in principle	Further clarity required to ascertain whether this objective has any impacts on Objective 16B.	Agree with proposed content, but on the proviso that this objective is not to the detriment of mana whenua/tangata whenua values as per Objective 16B.
Objective 19	Neutral	Further clarity would help to understand what this means for our district in practice.	Objective is very high-level.
Objective 20	Neutral	Include hierarchy for mitigation and protection measures.	Need to provide for impacts on the natural environment where the need for essential services or infrastructure is great. For example, protecting a communities drinking water supply. It is possible that mitigation measures to protect human life, regionally significant infrastructure, or critical facilities such as hospitals, will impact on natural values of rivers and wetlands, etc. The RPS should look at including a hierarchy whereby mitigation or protection measures that impact on natural process are provided for if the need is great.
Objective 21	Support in principle	More guidance needed for this Objective.	Objective is supported but more guidance needed around how this would work in practice.
Objective 22	Support	Support proposed content.	The review of the WCDP will reflect this objective through areas of intensification – allowing for higher density and mixed use development.

Objective 22A	Neutral	Further clarity sought on how this will impact Tier 3 councils	Need further clarity on how this impacts the Wairarapa District Councils in terms of intensification, and if so - how? The review of the WCDP is proposing to intensify the residential zone (in certain areas).
POLICIES			
Policy 3	Support in part.	Support in part but further clarity required with this policy.	The Wairarapa Combined District Plan Coastal Environment Area Overlay types will remain which controls the way development is considered in the coastal environment with tighter restrictions than the receiving zone. What are the bottom lines? Further clarity is required: - Will this mean we can't do protection work on the coast? - Is the intent to block hard infrastructure? - If we still use hard infrastructure, how do we do it? i.e. where in the RPS is this covered? - Need to reference sea level rise and implications
Policy 7	Neutral	Further clarity sought on how this will impact Tier 3 councils	Note that this is a significant affordability issue for our community.
Policy 9	Support in principle	Further clarity sought on how this will impact Tier 3 councils	Agree in principle - but further clarity is required regarding how this will work for Tier 3 Councils.
Policy 10	Support in principle	Further clarity sought on how this will impact Tier 3 councils	Agree in principle - but how will this work for Tier 3 Councils? Please clarify.
Policy 11	Support	Support proposed content	Agree - the review of the Wairarapa Combined District Plan will reflect this.
Policy 14	Neutral	Further clarity sought on this Policy.	Further clarity sought on roles and functions with joint processing, thresholds etc. expectations around processing. Will need to be managed by both Regional and District Councils. District Councils currently being compelled by GWRC to obtain discharge consents for existing stormwater networks. We need clarity on the "roles" and "responsibilities" of the TA and Regional Council under this proposed change.

Policy 15	No, oppose in part.	Further clarity required with this.	<p>Policy asks TAs to manage earthworks and vegetation disturbance to achieve target attribute states.</p> <p>Understand under NPS-FM environmental bottom lines are required, but this Policy goes as far as to manage earthworks for driveways and retaining walls.</p>
Policy 17	Support	Consider the inclusion of economic and cultural needs as well, even if it is in prioritised criteria.	Agree that the Regional Rules need to allow for the health needs of people – but acknowledge that economic and cultural needs should be considered.
Policy 18	Neutral	Include artificial wetlands for protection.	We want to see Henley Lake covered as part of this Policy, and the potential for other artificial wetlands that have ecological value to be covered.
Policy 24	Neutral		This is currently being looked at as part of the Wairarapa Combined District Plan review, as part of the NPS Indigenous Biodiversity.
Policy 29	Support in part.		<p>Support in principle but it has significant implications for development in the Masterton urban area (behind stop banks).</p> <p>The Wairarapa Combined District Plan will take a risk-based approach to hazard planning, as covered in the Wairarapa Combined District Plan review in the Natural Hazards Chapter (including GIS mapping, zones and appropriate overlays).</p> <p>But the extent of the policy is unclear, and questions remain. How are the objective and methods reconciled with the national direction for urban growth and intensification? What policies, rules and evidence will be necessary to avoid legal challenge?</p>
Policy 30	Support		This is being looked at in Wairarapa Combined District Plan review.
Policy 31	Support		This is being looked at in Wairarapa Combined District Plan review - areas for intensification being provided.
Policy 32	Support		Zones being reviewed as part of Wairarapa Combined District Plan review.
Policy 33	Neutral	Include District Plans which will allow for local infrastructure to support the Policy.	

Policy 51	Support in part.	Further clarity sought on impacts to consenting pathways for stop banks.	The Wairarapa Combined District Plan will give effect to this Policy. See also response against Policy 29.
Policy 52	Support in part.	Further clarity required regarding the extent to which we need to consider effects.	We understand the Policy has been reworded since limited release to reflect that it does not restrict river protection works (structural) from happening, rather it is a consideration to understanding their potential effect on the environment.
Policy 56	Support		The contents of this policy is being considered as part of the Wairarapa Combined District Plan review.
Policy 57	Neutral	Further clarity requested on how this policy can be implemented in the Wairarapa.	Public transport in the Masterton District and throughout the Wairarapa is significantly limited in comparison to the Hutt, Wellington, and Porirua regions. We are interested in further clarity on the extent that land use can be integrated with transport.
Policy 58	Neutral	Policy is too specific. Should be broader to encourage a range of infrastructure.	Very important to have the necessary infrastructure there for any new subdivision and/or development. Difficult to sequence.
Policy 65	Support	Support proposed content.	Energy efficiency and waste minimisation are part of our Climate Action Plan so we are supportive of this policy.
Policy CC.1	Support in principle	More clarity needed on what support will be provided for smaller councils to put infrastructure in place to contribute to these regional targets.	Agree in principle - it is being looked at in the Wairarapa Combined District Plan review. Acknowledge that targets are set as 'contributing to' the regional targets and that each district council will need to show how they contribute towards the regional target through their objectives, policies and rules i.e., when developing their objectives, policies and rules how that contributes to the overall targets. We also note that the extent that each council can contribute will differ.
Policy CC.2C	Support	Support proposed content.	Note that the travel management plans need to be reflected in our Wairarapa Combined District Plans by June 2025.
Policy CC.4	Neutral	Need clarification between Tier 1 and Tier 3 obligations.	Discussed under Objective CC.2

Policy CC.5	Neutral	MDC asks that it is part of the design for this plan. Further clarity required to confirm whether this policy is about not allowing land use intensification and what it means for farming activity.	This reads as not allowing land use intensification - is this correct? What is the intent? We would like a seat at the table for designing this regional plan. Is this going to trigger farming activity resource consent requirements? Will all farming activity need to be consented?
Policy CC.6	Neutral	MDC strongly recommends that it is involved in the development of this plan as well as relevant sector and communities.	More clarity on this policy is required to ensure that the Wairarapa is not the carbon sink for the greater Wellington region. Acknowledge the amendment of Method CC.4 that spatial plan to be prepared using a partnership approach. More clarity needed on who the partnership approach will be with.
Policy CC.7	Support	Develop a corresponding non-regulatory method to develop guidance to support this policy.	The policy intent is supported, but there should be a corresponding non-regulatory method to develop guidance to integrate these solutions in infrastructure and development design options and assess when these solutions are and are not appropriate.
Policy CC.8	Support	Support proposed content.	
Policy CC.9	Neutral	More clarity on this policy required.	Supportive in principle but would like to know how this intends to be applied to provincial areas with significant rural roading networks.
Policy CC.10	Support	More clarity on this policy required.	Supportive in principle but would like more information on how it would work practically with some of our main trucking industries (especially stock moving and log hauling).
Policy CC.11	Neutral	MDC asks that it is part of developing this assessment.	More clarity is required on this policy.
Policy CC.13	Neutral	More clarity required regarding the policy intent with regard to dairy farming intensification.	Is the intent of this policy to limit dairy farming intensification? If so, how are these communities going to be supported?
Policy CC.14	Neutral	More clarity needed around the tree canopy cover target.	More information required as to how the tree canopy target will work in practice? How is it implemented, monitored and enforced?

			How do you maintain it?
Policy CC.15	Neutral	MDC requests involvement in the development of any RPS related policies about rural resilience to climate change.	Is the intent of this policy to limit dairy farming intensification? If so, how are these communities going to be supported?
Policy CC.18	Neutral	This policy requires more clarity as it has potential significant impacts on the Wairarapa economy.	Supportive in principle of the 'right tree right place' approach. The Wairarapa should not be the carbon sink for the Greater Wellington region.
Policy EIW.1	Support in principle	Further clarity sought on how this will impact Tier 3 councils.	Agree in principle - but how will this work for Tier 3 Councils?
Policy FW.2	Neutral	Further clarify the impacts on intensification.	Agree - but we need to specify how one will use this in practice. Will this hinder intensification?
Policy FW.3	Neutral	Recommend the following amendments (in bold): <i>(f) Integrate planning and design of stormwater management to achieve multiple improved outcomes - amenity values, recreational, cultural, ecological, climate, vegetation retention; protection of life and property</i>	We request clarity on the joint processing of consents (Policy FW.3, Method FW2). In particular: How is this going to work? What will trigger this process? What is the threshold? What does this look like in practice? What does this look like for iwi?
Policy FW.4	Neutral		Acknowledge that this policy is important for future planning.
Policy FW.6	Neutral		In reference to Method 5 - How does this work in practice? How are responsibilities between TA and GWRC distributed? Joint processing - how will this work? Who will manage the process?
Policy UD.2	Support		Intent of this policy has been considered as part of the Wairarapa Combined District Plan review. MDC is allowing for it as a permitted activity in appropriate zones.
METHODS			

Method 10	Support	Support proposed content.	Energy efficiency improvements is included as part of our Climate Action Plan so the information would be useful to the work MDC is doing. We are supportive of this method.
Method 11	Support	Support proposed content.	Information about water conservation and efficient use is supported. Water resilience is included as part of our Climate Action Plan so the information would be useful for our staff to disseminate to our communities.
Method 12	Support	Support proposed content.	Increased biodiversity and ecosystem health is part of our Climate Action Plan so the information would be useful for achieving these outcomes.
Method 14	Support	Support proposed content.	District resilience is included as part of our Climate Action Plan so the information would be useful for our staff and our communities. We are supportive of this method.
Method 17	Support	Support proposed content.	Waste minimisation is included as part of our Climate Action Plan and Waste Management & Minimisation Plan so the information would be useful for our staff and our communities. We are supportive of this method.
Method 22	Support	Support proposed content.	Disaster risk reduction/hazard risk management and climate change adaptation planning should already be occurring together. We are supportive of an integrated approach.
Method 34	Neutral	Further clarity required for this method.	Further clarity is required with regard to implementation and transitional arrangements for Entity C (three waters)
Method 53	Support	Support proposed content.	A healthy natural environment is a key tool in creating a climate resilient district so we are supportive of this method.
Method 54	Neutral	More information is required about what this would look like in practice.	What type of assistance does this intend to provide (Financial? Education? Plants?) and who will be responsible for it?

Method CC.1	Support	Support proposed content.	Increasing public education around climate change issues and solutions is one of the main actions of our newly established Climate Action Plan so we are supportive of this method.
Method CC.2	Support	Support proposed content.	Regional guidance on emissions offsetting opportunities and limits would be useful so we are supportive of this method.
Method CC.3	Support	MDC requests involvement in this work.	Supportive in principle but we would like to know more about how these plans will work in provincial towns/rural areas.
Method CC.4	Support	Recommend the following amendments (in bold): <i>Implementation: Wellington Regional Council* and city and district councils (GWRC will co-lead with each city and district council with regard to their respective geographical areas)</i>	MDC requests to be one of the organisations involved with preparing this plan. Plan needed to ensure that the Wairarapa isn't used as the greater region's carbon sink.
Method CC.5	Neutral	MDC requests to be part of the design for this.	
Method CC.7	Neutral	More information required to understand what this looks like and what the implications are for our community.	Regional guidance on the use of transport pricing tools would be useful. Does this only apply to city councils?
Method CC.8	Support in principle	More information required for this method.	Supportive in principle but need to know more about how this will work in with central government and primary industry initiatives in this area.
Method CC.9	Support	Support proposed content.	A healthy natural environment is a key tool in creating a climate resilient district so we are supportive of this method.
Method CC.10	Support	MDC is requesting more information on how these incentives will work in rural areas.	Regional incentives for mode shift to low-emissions transport will be key to our district contributing to lowering regional emissions.
Method UD.1	Support	Need to clarify this is optional for other authorities.	Tier 3 Councils are not required under the NPS to prepare an FDS. The Wairarapa Combined District Plan review in line with this.

Method UD.2	Neutral	Further clarity is required.	Further clarity sought on some aspects e.g. Policy FW.1
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