

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S25 Carterton District Council	S25.044	General comments - non-regulatory policies	Support	CDC is generally supportive of the non-regulatory methods proposed but notes that there will be financial implications in giving effect to these. CDC would seek practical and financial support from GWRC in implementing these methods.	Retain the policies. GWRC to provide practical and financial support to implement these methods.
S32 Director- General of Conservation	S32.035	General comments - non-regulatory policies	Support	The proposed changes appropriately respond to climate change and national direction.	Retain as notified.
S94 Guardians of the Bays Incorporated	S94.017	General comments - non-regulatory policies	Support	No reasons given	Retain as notified
S163 Wairarapa Federated Farmers	S163.079	General comments - non-regulatory policies	Oppose	Defer to full review of the RPS in 2024	Delete all amendments
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.041	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose in part	<p>This policy stretches the legislative powers and authority of territorial authorities and Council considers this policy should be a regional council function only.</p> <p>It is unclear what nature-based solutions would mean in a rural context, or how this would be achieved in a non-regulatory way. This could place additional burden without required financial support.</p> <p>The policy also does not consider how benefits would be apportioned when something is generated or demanded in an urban and rural area.</p>	Amend to clarify as a regional council function only, what is meant and review to ensure that this can be achieved.
S128 Horticulture New Zealand	S128.050	Policy CC.15: Improve rural resilience to climate change -	Support	Support improving rural resilience to climate change, including in promoting and supporting land uses that will reduce gross greenhouse gas emissions	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		non-regulatory			
S133 Muaūpoko Tribal Authority	S133.049	Policy CC.15: Improve rural resilience to climate change - non- regulatory	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S144 Sustainable Wairarapa Inc	S144.010	Policy CC.15: Improve rural resilience to climate change - non- regulatory	Support	Important that knowledge of natural hazards is widespread	Retain as notified.
S147 Wellington Fish and Game Council	S147.076	Policy CC.15: Improve rural resilience to climate change - non- regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S163 Wairarapa Federated Farmers	S163.080	Policy CC.15: Improve rural resilience to climate change - non- regulatory	Oppose	Defer to full review of the RPS in 2024 The proposed over-arching Objective A and Objective B are intended to provide a more concrete pathway towards a similar result.	That Policy CC.15 be deleted Delete the FW icon
S165 Royal Forest and Bird	S165.082	Policy CC.15: Improve rural	Support		Retain

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Protection Society of New Zealand Inc. (Forest & Bird)		resilience to climate change - non-regulatory			
S166 Masterton District Council	S166.054	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Not Stated / Neutral	Is the intent of this policy to limit dairy farming intensification? If so, how are these communities going to be supported?	MDC requests involvement in the development of any RPS related policies about rural resilience to climate change.
S170 Te Rūnanga o Toa Rangatira	S170.065	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Not Stated / Neutral	Policy CC.15 Reducing agricultural gross biogenic methane emissions - consideration Does this policy cover methane emissions from landfills?	Policy CC.15 Reducing agricultural gross biogenic methane emissions - consideration Does this policy cover methane emissions from landfills?
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0107	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	In principle Ātiawa supports the intent of this policy.	Retain as notified.
S167 Taranaki Whānui	S167.0125	Policy CC.15: Improve rural resilience to climate change -	Support	We (Taranaki Whānui) are aware that central government is taking the lead on the policy approach but given the climate crisis and the role agriculture plays, Taranaki Whānui as mana whenua feel strongly that the minimum expectation for this region should aim for reduction. Taranaki Whānui supports the new Policy CC.15. In	Retain as notified.

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		non-regulatory		particular the promotion and support of gross greenhouse gas emission reduction.	
S168 Rangitāne O Wairarapa Inc	S168.0131	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Rangitāne o Wairarapa strongly support the inclusion of nature-based solutions in the promotion and support for land management practices and / or land uses that improve climate change resilience. Provision of information on climate change data and projections to rural communities, and promotion and support for land management and use practices that reduce GHG emissions is also supported.	Retain as notified.
S11 Outdoor Bliss Heather Blissett	S11.019	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Too passive	Amend as such: "Regional city and district Councils will should under Local Government Act 2002..."
S11 Outdoor Bliss Heather Blissett	S11.020	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Take out last sentence of explanation as it cancels what has just been said. Too passive.	Amend Explanation as such: "... but this is not expected to be a requirement "
S16 Kāpiti Coast District Council	S16.028	Policy CC.16: Climate change adaptation strategies, plans and	Support	We support reference to dynamic adaptive planning pathways or similar adaptive planning approaches, and the other matters listed in the policy.	Retain

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		implementation programmes - non-regulatory			
S30 Porirua City Council	S30.080	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Oppose	Council oppose this policy and seek its deletion. The RPS should not direct when and how territorial authorities will use their powers under the Local Government Act. These are matters for councils to determine at their discretion and in response to the concerns and issues for their communities. There is no such thing as a city plan under the RMA.	Delete policy, or amend policy so that it provides clear and appropriate direction to plan users in line with objectives.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.022	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Council supports the intent of the policy, but it states it is non regulatory policy and then requires action under the Local Government Act, and for regulatory actions to be taken in district plans under clause (c).	Amend to make it non regulatory measures only and delete clause c).
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.028	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Generally supports the non-regulatory policies in the 'Climate Change' chapter. However, Māori landowners should also be included in the decision-making process. This will allow for a collaborative approach, ensuring that Māori landowners have an equitable stake when it comes to outcomes of adaptation, managed retreat or re- location.	Amend Policy CC.16 as follows: Regional, city and district councils should, under the Local Government Act 2002, partner with mana whenua / tangata whenua, landowners and engage local communities in a decision-making process to develop and implement strategic climate change adaptation plans that map out management options over short, medium and long term timeframes, using a range of tools and methods.

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S115 Hutt City Council	S115.083	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy CC.16 to make it clear it does not apply to city and district councils.
S128 Horticulture New Zealand	S128.051	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Support development of strategic climate change adaptation plans, seek some amendments to provide for water storage.	Add a subclause: (h) options for water storage to promote resilience for rural and urban communities.
S140 Wellington City Council (WCC)	S140.084	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	WCC supports the intent of the Policy but is concerned that if done on a city or district wide scale, the benefits will be limited and not achieve integrated management throughout the region.	Amend so it is led and guided by Greater Wellington Regional Council.
S144 Sustainable Wairarapa Inc	S144.033	Policy CC.16: Climate change adaptation strategies,	Support		Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		plans and implementation programmes - non-regulatory			
S163 Wairarapa Federated Farmers	S163.081	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Oppose	Defer to full review of the RPS in 2024	That the amendments to Policy CC.16 be deleted.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.083	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support		Retain
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.0108	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Ātiawa note that care should be taken where policies lump together partnering with mana whenua and engaging the community, this relationship should be managed under a Tiriti framework to ensure the principles are upheld. Only mana whenua can identify te ao Māori and mātauranga Māori approaches, and Te Mana o te Wai and Te Rito o te Harakeke.	Ātiawa supports Policy CC.16, and are supportive of partnering with the Regional Council to prepare strategic climate change adaptation plans, mana whenua involvement will be enabled through subclause (g) of this policy. Ātiawa seek that the community is provided for in a separate policy.

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S167 Taranaki Whānui	S167.0126	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support	Taranaki Whānui supports the new Policy CC.16	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0132	Policy CC.16: Climate change adaptation strategies, plans and implementation programmes - non-regulatory	Support in part	Rangitāne o Wairarapa support in part the wording to partner with mana whenua in the decision-making process. However, we request that sub-clause (e) requires a range of tools and methods that 'give effect' to Te Mana o te Wai and Te Rito o te Harekeke, in order to be consistent with the relevant national policy statements. It is not sufficient to 'consider' these concepts.	Amend the policy to include wording that will 'give effect' to Te Mana o te Wai and Te Rito o te Harakeke, as required by the relevant national policy statements.
S30 Porirua City Council	S30.081	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Council recognises that iwi/Māori communities are particularly vulnerable to the effects of climate change, including low lying settlements such as Takapuwahia and Hongoeka in Porirua.	Retain as notified.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.023	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Council supports mana whenua being supported to develop iwi climate change adaptation plans, to manage the impacts of climate change.	Retain provision as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.029	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support in part	This policy should be "considered" at implementation as climate change will disproportionately affect Māori.	Amend policy as follows: Policy CC.17: Iwi climate change adaptation plans - non-regulatory considered.
S133 Muaūpoko Tribal Authority	S133.050	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S147 Wellington Fish and Game Council	S147.077	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.084	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support		Retain
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0109	Policy CC.17: Iwi climate change adaptation plans -	Support	Ātiawa supports Policy CC.17, Ātiawa want to ensure that iwi climate change adaptation plans are provided equal consideration and implementation as part of the wider adaptation action/frameworks to plan for climate change.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		non-regulatory			
S167 Taranaki Whānui	S167.0127	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support in part	<p>The success of this policy will rest on implementation and ability of Councils to work with iwi.</p> <p>Taranaki Whānui supports the principle of new Policy CC.17.</p> <p>Taranaki Whānui recommend this policy is updated to reflect opportunities to be involved in long-term planning process.</p> <p>Taranaki Whānui would like to ensure the funding of these plans and see them as part of the long-term planning process.</p>	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0133	Policy CC.17: Iwi climate change adaptation plans - non-regulatory	Support	Rangitāne o Wairarapa support wording to assist tangata whenua in the development of iwi-led climate change adaptation plans.	Retain as notified.
S11 Outdoor Bliss Heather Blissett	S11.021	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	Need a better more definitive word than preference	Amend Policy CC.18 as such: "... regeneration of permanent indigenous forest instead of in preference to exotic species"
S25 Carterton District Council	S25.045	Policy CC.18: Increasing regional forest cover to support	Support in part	CDC supports this policy, and in particular the recognition of the effects that afforestation has on the social and economic wellbeing on communities. GWRC should work with local communities to manage the location and impacts of new forest, and any afforestation should be spread equitably across	Amend the policy so that it applies to permanent forest.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		climate change mitigation: "right tree-right place" - non-regulatory		the region. CDC requests that this policy is more explicit in its preference for permanent, rather than plantation, forestry.	
S30 Porirua City Council	S30.082	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	The Regional Policy Statement should not direct when and how territorial authorities will use their powers under the Local Government Act or under other statutes such as the management of reserves under the Reserves Act 1977. These are matters for councils to determine at their discretion and in response to the concerns and issues for their communities.	Delete policy or amend so that it applies to the regional council only.
S115 Hutt City Council	S115.084	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy CC.18 to make it clear it does not apply to city and district councils.
S123 Peter Thompson	S123.008	Policy CC.18: Increasing regional forest cover to support climate change mitigation:	Support	Strongly advocate for using the appropriate species for the forest cover	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		"right tree-right place" - non-regulatory			
S133 Muaūpoko Tribal Authority	S133.051	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree- right place" - non- regulatory	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.
S137 Greater Wellington Regional Council (GWRC)	S137.060	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree- right place" - non- regulatory	Support in part	The provisions aim to promote and support the planting or regeneration of, preferentially, permanent and indigenous trees on highly erodible land, and particularly in catchments that have issues with a large amount of sediment ending up in waterbodies. Increasing indigenous permanent forestry cover in these areas will have multiple benefits, for improving water quality, increasing biodiversity, and providing more forested areas that absorb carbon dioxide. To be clear, the intent of these provisions is not to support unfettered afforestation across the region with the sole purpose of providing a carbon sink. Amendments are required to make the intent clear.	Review and, where necessary, amend the wording of these provisions to ensure that their intent is clear, which is to support an increase in forest extent in the Wellington Region that meets the principles of "right tree right place", providing optimal outcomes for water quality, indigenous biodiversity, and carbon sequestration.
S140 Wellington City Council (WCC)	S140.085	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree- right place"	Support	Support as proposed.	Retain as notified.

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		- non-regulatory			
S144 Sustainable Wairarapa Inc	S144.013	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	This is excellent: "Priority should be given to promoting and incentivising the planting and regeneration of permanent indigenous forest in preference to exotic species, particularly on highly erodible land and in catchments where water quality targets for sediment are not reached."Strongly advocate for using the appropriate species for the forest cover as benefits to regional biodiversity will be maximised if this approach is used	Retain as notified.
S147 Wellington Fish and Game Council	S147.078	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S163 Wairarapa Federated Farmers	S163.082	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Oppose	As set out for climate change objectives.	That Policy CC.18 be deleted Delete the FW icon.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.085	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	Support this, however, request that where forests are to be used as carbon offsets, it should be a regulatory requirement to plant indigenous species rather than exotic forest. As such, this method will need amendment to reflect that part of its subject matter is a regulatory matter.	Amend provision to address relief sought in submission.
S166 Masterton District Council	S166.055	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	Supportive in principle of the 'right tree right place' approach. The Wairarapa should not be the carbon sink for the Greater Wellington region.	Retain as notified. However: This policy requires more clarity as it has potential significant impacts on the Wairarapa economy.
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.0110	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support	Ātiawa supports increasing regional forest cover, particularly indigenous permanent forest. Ātiawa requests that the Regional Council look for opportunities for mana whenua to partner together in regards to Policy CC.18 and planting of indigenous forest.	Retain as notified.
S167 Taranaki Whānui	S167.0128	Policy CC.18: Increasing	Support in part	Given historical land confiscations and development barriers - there needs to be a specific protection in place to prevent further disadvantage to mana	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory		whenua. Future planning in partnership with mana whenua will provide greater confidence that the of implementation through regional plans. Taranaki Whānui supports the principle of new Policy CC.18 but would like to see firm protections for mana whenua in both resourcing and partnering in the development of regional forest plans.	
S168 Rangitāne O Wairarapa Inc	S168.0134	Policy CC.18: Increasing regional forest cover to support climate change mitigation: "right tree-right place" - non-regulatory	Support in part	Rangitāne o Wairarapa strongly support the promotion and support for planting and natural regeneration of forests to realise the benefits identified in the policy, particularly indigenous biodiversity, erosion control, protecting aquatic ecosystems and increasing social and economic well-being. However, Rangitāne o Wairarapa request that cultural well-being is included as one of the benefits which is subsequently maximised. Prioritising promotion and incentives for planting and regenerating permanent indigenous forest in preference to exotic species is also strongly supported.	Amend policy to read: "Promote and support the planting and natural regeneration of forest to maximise the benefits for carbon sequestration, indigenous biodiversity, erosion control, freshwater and coastal ecosystems, and the social, cultural , and economic well-being of local communities."
S11 Outdoor Bliss Heather Blissett	S11.005	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	Remove words information, promote, support and encourage and replace with action. Now is time for action and these words are still too passive. My local Council have been ignoring GWRC information, promotion, support and encouragement to date.	Amend as follows: Incentivizing efficient use and conservation of resources - regulatory .
S16 Kāpiti Coast District Council	S16.044	Policy 65: Supporting and encouraging efficient use and conservation of	Support	Council supports the sharing of responsibilities with GWRC on information provision on the topics identified via non-district plan methods.	Retain

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		resources - non-regulatory			
S30 Porirua City Council	S30.083	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	This would improve the certainty and clarity of the policy.	Amend policy to clarify who is responsible for each of these initiatives.
S63 Mary Beth Taylor	S63.008	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Conservation first must lead all future resource use decisions. Councils must 'teach', encourage and support conservation practices especially for land, water, energy.	Retain as notified.
S78 Beef + Lamb New Zealand Limited	S78.019	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Not Stated / Neutral	Accepts that the amendments to operative Policy 65 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
S95 Tony Chad	S95.007	Policy 65: Supporting and encouraging efficient use and	Support	Conservation first must lead all future resource use decisions. Councils must 'teach', encourage and support conservation practices especially for land, water, energy.	Retain as notified.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		conservation of resources - non-regulatory			
S99 Genesis Energy Limited	S99.004	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	The expansion of electricity generated from renewable sources assists in the purpose of the policy to reduce emissions. Accordingly, Genesis considers it is appropriate that the policy explicitly seeks to support and encourage the increased development in renewable electricity generation.	Amend Policy 65 as shown below. Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory To support and encourage conservation and efficient use of resources by: (a) applying the 5 Rs (Reduce, Reuse, Recycle, Recover, and Residual waste management); (b) reducing organic waste at source from households and commercial premises; (c) increasing the diversion of wastewater sludge from wastewater treatment plants before deposition to municipal landfills; (d) requiring efficient municipal landfill gas systems; (e) increasing the proportion of electricity generated from renewable sources; (f) using water and energy efficiently; and (g) conserving water and energy. Explanation Policy 65 promotes the efficient use of resources to reduce emissions and supports the expansion of electricity generation from renewable sources to assist the transition from fossil fuel dependence. The policy endorses the waste hierarchy and also promotes similar principles for efficient water and energy use.
S100 Meridian Energy Limited	S100.022	Policy 65: Supporting and encouraging efficient use and conservation	Support in part	Policy 65 addresses some, but not all, of the issues. To respond to the regionally significant issues identified in relation to fossil fuel dependence and the aim of transitioning to a low emission economy reliant on renewable energy, the RPS needs to include positive support for optimising the efficiency of use of renewable energy sources for electricity	Amend Policy 65 by inserting a clause that seeks to increase the proportion of electricity generated from renewable sources as follows (or similar) and insert explanatory text and renumber the following clauses sequentially: To support and encourage conservation and efficient use of resources by: (a) applying the 5 Rs (Reduce, Reuse, Recycle, Recover, and

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		n of resources - non-regulatory		generation (which includes increasing generation capacity).	Residual waste management); (b) reducing organic waste at source from households and commercial premises; (c) increasing the diversion of wastewater sludge from wastewater treatment plants before deposition to municipal landfills; (d) requiring efficient municipal landfill gas systems; (e) increasing the proportion of electricity generated from renewable sources; (f) using water and energy efficiently; and (g) conserving water and energy. Explanation Policy 65 promotes the efficient use of resources to reduce emissions and supports the expansion of electricity generation from renewable sources to assist the transition from fossil fuel dependence. The policy endorses the waste hierarchy and also promotes similar principles for efficient water and energy use.
S115 Hutt City Council	S115.085	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy 65 to make it clear it does not apply to city and district councils.
S133 Muaūpoko Tribal Authority	S133.015	Policy 65: Supporting and encouraging efficient	Support in part	The intent of this policy is supported. However, notes that the freshwater provisions require review to ensure they effectively incorporate local expressions of Te Mana o te Wai.	Retain as appropriate, noting a review of freshwater provisions is necessary.

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		use and conservation of resources - non-regulatory			
S140 Wellington City Council (WCC)	S140.086	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Support as proposed.	Retain as notified.
S147 Wellington Fish and Game Council	S147.079	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S162 Winstone Aggregates	S162.017	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Generally supports for Policy 64 with minor amendments to the policy heading.	Retain as notified.
S165 Royal Forest and	S165.086	Policy 65: Supporting and	Support in part	The explanation to this policy states that it is about the efficient use of resources to reduce emissions.	Amend explanation to reflect actual intent and effect of policy.

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Bird Protection Society of New Zealand Inc. (Forest & Bird)		encouraging efficient use and conservation of resources - non-regulatory		However, the policy appears to be broader than emissions reduction, and covers waste reduction.	
S166 Masterton District Council	S166.041	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Energy efficiency and waste minimisation are part of our Climate Action Plan so we are supportive of this policy.	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.054	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support in part	Rangitāne o Wairarapa support the conservation and efficient use of water and energy. However, this policy is not strong enough in directing the efficient use of water. Policy 11 of the NPS FM is worded in a directive way so as to 'require' efficient use, it is not sufficient to 'support' or 'encourage' efficient use of water	Amend the policy and its explanatory text: So that it is consistent with the directive language of Policy 11 of the NPS FM in relation to the efficient use of freshwater.
S170 Te Rūnanga o Toa Rangatira	S170.015	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Not Stated / Neutral	Objective 11 could be worded to express a stronger behavioral direction to say: the quantity of waste disposed of is reduced to ultimately remove our reliance on landfills. Policy 65 is non-regulatory for the extent of the Objective. To be able to remove our reliance on landfills, a policy that is regulatory will be required.	Move Policy 65 to Regulatory policy chapter

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0111	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	In principle Ātiawa supports Policy 65. Ātiawa would like to see more emphasis on reducing waste first.	(a) applying the 5 Rs (reduce, reuse, recycle, recover, and residual waste management), in particular encourage and supports actions to reduce waste;
S167 Taranaki Whānui	S167.0129	Policy 65: Supporting and encouraging efficient use and conservation of resources - non-regulatory	Support	Taranaki Whānui supports the amendments to Policy 65. Taranaki Whānui want to signal their intention to be involved in partnership and decision-making regarding waste management.	Retain as notified.
S16 Kāpiti Coast District Council	S16.073	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	Council considers water attenuation and retention should be required via regulatory methods. Council notes water attenuation via hydraulic neutrality is a recurring theme within the Whaitua plans that have been completed to date (which do not yet include the Kāpiti Coast District). Council notes including water attenuation, retention and hydraulic neutrality requirements in the RPS would assist any city or district council that has included stormwater attenuation provisions in their Intensification Planning Instruments.	Amend to require water attenuation and retention via hydraulic neutrality to be implemented in district plans via regulatory methods.
S30 Porirua City Council	S30.084	Policy FW.7: Water attenuation and retention - non-regulatory	Oppose	These matters are covered by earlier regulatory and consideration policies, it is unclear how it fits with these or adds more guidance for plan users.	Delete policy, or amend policy so that it provides clear and appropriate direction to plan users in line with objectives.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.059	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Council supports the need to attenuate and retain water and considers that this should be a regulatory approach, except that the measures to achieve this should be non-regulatory, particularly given our comments on nature-based solutions.	Retain clauses a) and b) as a non-regulatory means of compliance but include a new regulatory policy that identifies that plan changes and variations should promote and support water attenuation and retention.
S78 Beef + Lamb New Zealand Limited	S78.002	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Supports proposed new Policy FW.7	Retain as notified
S86 Irrigation New Zealand (Irrigation NZ)	S86.005	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Further clarification to be provided to ascertain other types of storage to within sub-clause (b), such as catchment for irrigation purposes, to ensure that primary industries are sufficiently accounted for.	Amendment sub-clause (b) of Policy FW.7 to provide further specification of natural and built solutions to attenuate and retain water to provide adequate provision for primary industries.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.049	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Policy FW.7 should be a "Matter to be considered", rather than non-regulatory. This will work towards strengthening a change of view and promoting and encouraging ecosystem health.	Amend Policy FW.7 to a 'considered' policy.
S113 Wellington Water	S113.045	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Clause (b) should be amended to support public health outcomes	Amend clause (b) as follows: (b) built solutions including storage at community, farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds), while ensuring appropriate consideration of public health outcomes.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S115 Hutt City Council	S115.086	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.
S128 Horticulture New Zealand	S128.052	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Support promotion and support of options for water attenuation and retention, such as groundwater recharge and water storage at varying scales. These will be important for climate change resilience.	Retain as notified
S136 DairyNZ	S136.019	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Water availability will continue to be a pressing issue for the Greater Wellington region due to both the regulatory implications of implementing Te Mana o te Wai and the increasing pressures of Climate Change. Support Policy FW.7 and would like to see an ambitious and collaborative approach to investing and developing a diverse portfolio of nature based and constructed solutions to water storage in the region. This works could begin prior to any further regulatory changes. Water availability is crucial to most land uses and reliable access to water will create flexible for farmers and the wider community to adapt to climate change.	Delete Policy FW.7 and address the issue through a full review of the RPS.
S139 Ian Gunn	S139.009	Policy FW.7: Water attenuation and retention - non-regulatory	Support	The potential of nature based solutions to slow water down, maintain stream/river base flows reduce sedimentation, improve water quality, improve carbon sequestration etc. There is an opportunity for council to specifically develop prototypes to advance the nature based approach.	Add examples of nature based solutions to the policy eg. more room for rivers, allow temporary shallow flooding outside existing stop banks, resulting increased natural character of waterways. include research and prototyping of nature based solutions. Add to the explanation: Flood management is undergoing a change in approach from hard structures down river to the exploration of NBS up river and on the flood plain. The creation

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
					orrehabilitation of wetlands, construction of bunds all have multiple benefits varying to reducing flood peaksto increasing water resilience.
S140 Wellington City Council (WCC)	S140.087	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Support as proposed.	Retain as notified.
S144 Sustainable Wairarapa Inc	S144.043	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Solutions like these need to be built at scale and support is needed to make it easier for landowners. The regions stock water races presently provide some groundwater recharge. Some races have been closed without fully investigating the effect of removing this source of recharge.	Amend clause (a) to expand the examples of nature based solutions to include more detail around flood management, to read" (a) nature based solutions including slowing water down in the landscape and increasing groundwater recharge (riparian management, wetland enhancement/restoration, flood management), giving rivers more room, allowing some temporary, shallow flooding of areas outside existing stop banks and allowing more natural character of waterways ; and
S144 Sustainable Wairarapa Inc	S144.044	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Built solutions should be limited to farm scale except if they are solely used for public water supply. Large scale built solutions for water storage are unlikely to give effect to Te Mana o te Wai.	Amend clause (b): (b) built solutions including storage for public water supply at community , farm, and domestic (rain tanks) scales, groundwater augmentation, built retention (wetlands, bunds).
S144 Sustainable Wairarapa Inc	S144.045	Policy FW.7: Water attenuation and retention -	Support in part	Researching and prototyping nature-based solutions will provide evidence of the benefits to landowners and encourage them to invest in these solutions.	Promote and support could be expanded to include researching and prototyping nature-based solutions.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		non-regulatory			
S144 Sustainable Wairarapa Inc	S144.046	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	The regions stock water races presently provide some groundwater recharge. Some races have been closed without fully investigating the effect of removing this source of recharge.	To include maintaining and enhancing the groundwater recharging capacity of the region's stock water races.
S144 Sustainable Wairarapa Inc	S144.047	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Existing legislation makes it difficult to build bunds because resource consents may be needed. Solutions like these need to be built at scale and support is needed to make it easier for landowners.	Add information relating to legislative change to support non-regulatory policies.
S144 Sustainable Wairarapa Inc	S144.061	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Flood management, particularly in times of small freshes in the rivers during the summer, has potential to provide water resilience by storing water in the landscape. It could also reduce flood peaks in rivers	Provide for opportunities for increased recharge (e.g. in times when there are freshes in the rivers).
S145 Wairarapa Water Users Society	S145.003	Policy FW.7: Water attenuation and retention - non-regulatory	Support	<p>The recognition of both Nature-based and built solutions is vital in allowing water to assist in achieving community wellbeing in Wairarapa and the rest of the region.</p> <p>The aim of this new Policy echo's the principles in the Wairarapa Water Resilience Strategy. The Wairarapa Water Users Society believes the foundations laid by this policy would be enhanced if it became an Objective.</p>	Retain as notified.
S147 Wellington Fish and Game Council	S147.080	Policy FW.7: Water attenuation and retention -	Support	Necessary to give effect to the NPS-FM.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		non-regulatory			
S163 Wairarapa Federated Farmers	S163.083	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Supports the intent of the policy, which is consistent with Ruamahanga WIP recommendations, the Wairarapa Water Resilience Strategy and the recent MPI report "Water Availability and Security". However, concern that it is non-regulatory. The proposed over-arching Objective B is intended to recognise the importance of this matter, and to provide a concrete pathway towards achieving it.	That the intent of Policy FW.7 be retained and expressed as an objective.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.087	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part		'Nature based solutions' should be italicised.
S168 Rangitāne O Wairarapa Inc	S168.060	Policy FW.7: Water attenuation and retention - non-regulatory	Support in part	Rangitāne o Wairarapa consider this policy needs amending so that it is clear who the policy is directed at. It should also be made clearer as to what flood management methods are considered nature-based solutions, as built or engineered flood management solutions would not fit within this definition.	Amend the policy: So that it is clearer who this policy is directed at; To be clearer as to what types of flood management are considered 'nature based solutions'.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0112	Policy FW.7: Water attenuation and retention - non-regulatory	Support	Ātiawa supports the Regional Council promoting and supporting natural and built solutions to attenuate and retain water.	Retain as notified.
S167 Taranaki Whānui	S167.0130	Policy FW.7: Water attenuation	Support	Taranaki Whānui supports Policy FW.7	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		and retention - non-regulatory			
S168 Rangitāne O Wairarapa Inc	S168.0180	Policy FW.7: Water attenuation and retention - non-regulatory	Support	The inclusion of nature-based solutions for attenuation and retention is supported.	Retain as notified.
S16 Kāpiti Coast District Council	S16.074	Policy FW.8: Land use adaptation - non-regulatory	Support	Council supports the intent of this policy and the identified methods and implementation responsibilities for this policy.	Retain
S30 Porirua City Council	S30.085	Policy FW.8: Land use adaptation - non-regulatory	Support in part	These matters align with the Regional Council's functions under s30.	Amend policy to clarify the regional council is responsible for supporting rural communities.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.016	Policy FW.8: Land use adaptation - non-regulatory	Oppose in part	<p>It is unclear who will be promoting this and how, and at what scale properties are expected to have a farm plan. It is also unclear which mechanism is intended to be used to require farm plans and suggests regulatory processes such as resource consents may be intended to serve this function.</p> <p>Territorial authorities are unlikely to have the expertise or resources to support this.</p> <p>Farm plans under clause (b) are also not defined and this could have range of requirements.</p>	Clarify policy and define farm plans or delete clause (b).
S115 Hutt City Council	S115.087	Policy FW.8: Land use adaptation	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		- non-regulatory			
S128 Horticulture New Zealand	S128.053	Policy FW.8: Land use adaptation - non-regulatory	Support in part	Land use change is an option for reducing emissions.	Amend subclause (c): (c) supporting primary sector groups and landowners in researching and promoting climate resilient or lower emissions land uses and pathways to move to new land uses.
S140 Wellington City Council (WCC)	S140.088	Policy FW.8: Land use adaptation - non-regulatory	Support in part	For better consistency and guidance of land use adaptation, this should be led by the Regional Council.	Amend Policy FW.7 to make it clear it does not apply to city and district councils.
S144 Sustainable Wairarapa Inc	S144.048	Policy FW.8: Land use adaptation - non-regulatory	Support in part	There are many nature-based solutions for water resilience that can be developed at a farm scale, but individual landowners have little incentive because the benefits are often downstream and they need more encouragement and proof of the benefits.	Expand to include prototyping, researching and promoting nature based solutions like swales, bunds and leaky dams.
S147 Wellington Fish and Game Council	S147.081	Policy FW.8: Land use adaptation - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S163 Wairarapa Federated Farmers	S163.084	Policy FW.8: Land use adaptation - non-regulatory	Oppose	Supports the intent of the policy, which is consistent with Ruamahanga WIP recommendations, the Wairarapa Water Resilience Strategy and the recent MPI report "Water Availability and Security. However, prefer that proposed over-arching Objectives A and B are included as they are intended to provide a concrete pathway towards a similar result.	That Policy FW.8 be deleted. Delete the FW icon.
S165 Royal Forest and Bird Protection	S165.088	Policy FW.8: Land use adaptation	Support		Retain

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Society of New Zealand Inc. (Forest & Bird)		- non-regulatory			
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0113	Policy FW.8: Land use adaptation - non-regulatory	Support	Ātiawa supports this policy	Retain as notified.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.0146	Policy FW.8: Land use adaptation - non-regulatory	Support		Retain
S167 Taranaki Whānui	S167.0131	Policy FW.8: Land use adaptation - non-regulatory	Support	Taranaki Whānui supports Policy FW.8.	Retain as notified.
S11 Outdoor Bliss Heather Blissett	S11.022	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	Not stated.	Amend Policy IE.3(b) as such: "Where possible, priorities should will also deliver benefits for..."
S16 Kāpiti Coast	S16.064	Policy IE.3: Maintaining , enhancing	Support in part	Council notes city and district councils are responsible for the maintenance of indigenous biodiversity but have no role under the RMA or	Clarify methods to deliver the policy and who will be responsible for the implementation of the methods in accordance with the

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
District Council		and restoring indigenous ecosystem health - non-regulatory		higher-legal statutory planning document for indigenous ecosystem restoration. Council requests these roles are clarified via the methods and implementation responsibilities in accordance with the functions specified under sections 30 and 31 of the RMA.	functions specified under sections 30 and 31 of the RMA.
S30 Porirua City Council	S30.086	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Oppose	This policy does not make sense. It is a non-regulatory policy that requires a regulatory response. It is unclear why the Wellington Regional Council hasn't addressed this through Proposed Change 1, but rather is requiring itself to do this through another change.	Delete policy.
S34 Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	S34.081	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Oppose	Council is concerned that the proposed non-regulatory approach, appears to be setting targets. It is unclear how these targets are intended to be applied via a non-regulatory mechanism. Council also notes that any targets set under the RPS require consultation.	Delete policy in its entirety and review once NPS-IB is gazetted.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.059	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support	Generally supports the non-regulatory policies in the 'Indigenous ecosystems' chapter.	Retain as notified.
S115 Hutt City Council	S115.088	Policy IE.3: Maintaining , enhancing and restoring	Oppose	While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for	Delete Policy IE.3

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		indigenous ecosystem health - non-regulatory		<p>identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p> <p>It is also unclear what is achieved by a direction in the Regional Policy Statement that the Regional Policy Statement should be amended.</p>	
S123 Peter Thompson	S123.019	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support	This is a key piece of work that needs to be completed to ensure that a difference is made	Retain as notified.
S133 Muaūpoko Tribal Authority	S133.024	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	Supports the requirement to partner with mana whenua/tangata whenua, but request that Muaūpoko are also recognised.	Recognise Muaūpoko as also having connection to indigenous biodiversity in Te-Whanganui-a-Tara. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te Whanganui-a-Tara is recognised.
S140 Wellington City Council (WCC)	S140.089	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support	Support as proposed	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S144 Sustainable Wairarapa Inc	S144.024	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support	This is a key piece of work that needs to be completed to ensure that a difference is being made - at present biodiversity is threatened by an ongoing decline in ecosystem and habitat health.	Retain as notified.
S147 Wellington Fish and Game Council	S147.038	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	amend title and text Policy IE.3: Maintaining and restoring indigenous ecosystem health the health of indigenous ecosystems and habitats with significant biodiversity or other values. To maintain, enhance and restore the ecosystem health, ecological integrity and ecological connectivity of the region's indigenous ecosystems, and habitats with significant biodiversity or other values , and the ecological processes that support them, giving effect to Te Rito o te Harakeke, the Regional Policy Statement shall, as soon as practicable:
S147 Wellington Fish and Game Council	S147.039	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and	amend subclause: (a) identify the characteristics required for the region's indigenous ecosystems and habitats with significant biodiversity or other values to be in a healthy functioning state, including the processes that enable them to persist over the long-term, and

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
				restorations risks adverse environmental effects and weakened climate change resilience for the region.	
S147 Wellington Fish and Game Council	S147.040	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	amend subclause (b) identify strategic targets and priorities to ensure that management and restoration of indigenous ecosystems and habitats with significant biodiversity or other values (including pest management) are directed at areas [etc.]..."
S163 Wairarapa Federated Farmers	S163.085	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Oppose	Defer to the 2024 RPS review. Clause a) would more efficiently be progressed at the national level. Generally support the intent of clause b) and c) but note that RPS Change One is not a pre-condition to action. Clause c) is broadly supported however question the extent to which proposals for imposing limitations to offsets is necessary and useful.	That Policy IE.3 be deleted. Delete the FW icon.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.089	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part		This policy should be a regulatory policy, and have regulatory method(s) giving effect to it.
S168 Rangitāne O Wairarapa Inc	S168.080	Policy IE.3: Maintaining , enhancing and restoring	Support in part	Rangitāne o Wairarapa support the intention of this policy, however, further amendments are sought in relation to the following: The timeframe to ensure identification and prioritisation is completed in a timely manner, rather	Amend the policy to provide for partnering with iwi in the prioritisation of indigenous ecosystems and habitats process. Alternatively, include an additional policy that recognises and provides for the role of mana whenua/tangata whenua in the identification of priority ecosystems, habitats and species for

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		indigenous ecosystem health - non-regulatory		than 'as soon as practicable'; The process surrounding prioritisation of ecosystems and habitats in subclause (b) should include partnership with iwi to ensure matauranga and taonga species are included and considered in the prioritisation process.	management and restoration. Include a timeframe (no later than 2024) in the policy to ensure identification and prioritisation is completed in a timely manner, rather than 'as soon as practicable'.
S170 Te Rūnanga o Toa Rangatira	S170.055	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Not Stated / Neutral	Policy IE.3 Giving effect to mana whenua roles and values when managing indigenous biodiversity - consideration It is confusing mana whenua roles and values are recognised in this particular policy and given consideration for a resource consent, however in other parts of the RPS we do not see them. Policy 49 has connections to Policy IE.3 and all taonga will need to be linked to a kaitiaki monitoring framework; it is confusing why the plan picks out a regime of giving effect to mana whenua values and roles particularly managing indigenous biodiversity but not other parts of the Plan.	Require mana whenua roles and values to be given consideration in consent applications. All taonga need to be linked to a kaitiaki monitoring framework
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0114	Policy IE.3: Maintaining , enhancing and restoring indigenous ecosystem health - non-regulatory	Support in part	Ātiawa supports the overall intent of Policy IE.3. Ātiawa seeks that mana whenua partner with Regional Council in this policy. Mana whenua can provide mātauranga Māori that is essential to understanding and identifying measures of ecosystem health. In addition, mana whenua are often acutely aware of areas that would benefit from restoration efforts. Further, partnering with mana whenua upholds Te Tiriti and the responsibility of Regional Council to work with mana whenua to protect and provide for mana whenua values at all levels of resource management (governance, decisionmaking, through to practical actions/operational level).	Amend introductory text to Policy IE.3 as follows: To maintain, enhance and restore the ecosystem health, ecological integrity and ecological connectivity of the region's indigenous ecosystems, and the ecological processes that supports them, giving effect to Te Rito o te Harakeke, the Regional Policy Statement in partnership with mana whenua shall, as soon as practicable:
S167 Taranaki Whānui	S167.0132	Policy IE.3: Maintaining , enhancing and restoring	Support in part	Taranaki Whānui supports the principle of Policy IE.3 but wants to see clearer reference to partnership with and the resourcing of mana whenua.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		indigenous ecosystem health - non-regulatory			
S16 Kāpiti Coast District Council	S16.065	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support	Council supports the recognition of the significant role landowners and communities play in the management of indigenous biodiversity.	Retain
S30 Porirua City Council	S30.087	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Oppose	This policy does not make sense. It is a non-regulatory policy that requires a regulatory response.	Delete policy, or amend policy so that it provides clear and appropriate direction to plan users in line with objectives.
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.060	Policy IE.4: Recognising the roles and values of landowners and	Support	Generally supports the non-regulatory policies in the 'Indigenous ecosystems' chapter.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		communities in the management of indigenous biodiversity - non-regulatory			
S115 Hutt City Council	S115.089	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p> <p>We also oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.</p>	Delete Policy IE.4
S133 Muaūpoko Tribal Authority	S133.025	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support in part	Supports the requirement to partner with mana whenua/tangata whenua, but request that Muaūpoko are also recognised.	Recognise Muaūpoko as also having connection to indigenous biodiversity in Te-Whanganui-a-Tara. OR Alternative relief that may be necessary or appropriate to ensure Muaūpoko connection to Te Whanganui-a-Tara is recognised.
S140 Wellington City	S140.090	Policy IE.4: Recognising the roles	Support	Support as proposed.	Retain as notified

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Council (WCC)		and values of landowners and communities in the management of indigenous biodiversity - non-regulatory			
S147 Wellington Fish and Game Council	S147.041	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	<p>amend title: Policy IE.4: Recognising the roles and values of landowners and communities in the management maintenance and restoration of indigenous biodiversity and habitats with significant biodiversity or other values - non-regulatory</p>
S147 Wellington Fish and Game Council	S147.042	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support in part	<p>The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10).</p> <p>While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species.</p> <p>An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.</p>	<p>Amend policy text Recognise and provide for the values of landowners and communities as stewards of the indigenous biodiversity of the Wellington Region, by:"</p>

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S147 Wellington Fish and Game Council	S147.043	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support in part	The suggested amendment follows from the suggested amendment to Objective 16, above, and is intended to give better effect to the NPS-FM (including Policy 10). While the protections of indigenous ecosystems and habitats is vital, so too is the maintaining and enhancing of the whole environment, including those containing valued introduced species. An unduly narrow indigenous - centric focus could lead to lessening or removal of protections for non-indigenous dominant systems, habitats, and species. The loss of protections, enhancements, and restorations risks adverse environmental effects and weakened climate change resilience for the region.	amend subclauses: (a) involving communities in the identification of targets and priorities for protecting, enhancing and restoring indigenous biodiversity and habitats with significant biodiversity or other values ; and (b) supporting landowner and community restoration of indigenous ecosystems and habitats with significant biodiversity or other values."
S163 Wairarapa Federated Farmers	S163.086	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Oppose	Support the intent of this policy, however the proposed over-arching Objective A is intended to recognise the importance of this matter, and to provide a concrete pathway towards achieving it.	That Policy IE.4 be deleted. Delete the FW icon.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.090	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous	Support		Retain

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		biodiversity - non-regulatory			
S168 Rangitāne O Wairarapa Inc	S168.081	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support in part	Rangitāne o Wairarapa acknowledge the role of landowners in the protection, enhancement and restoration of indigenous biodiversity, however the special relationship tangata whenua have with indigenous biodiversity must also be recognised and acknowledged in the identification and prioritisation process.	Amend policy IE.3 to include partnership with iwi in the prioritisation process and include a reference in the explanatory text to policy IE.4 which explains the special relationship of tangata whenua in this process. Alternatively , include an additional policy that recognises and provides for the role of tangata whenua in the identification of priority ecosystems, habitats and species for management and restoration.
S131 Ātiawa ki Whakarongotai Charitable Trust	S131.0115	Policy IE.4: Recognising the roles and values of landowners and communities in the management of indigenous biodiversity - non-regulatory	Support	Ātiawa supports the role and contribution of landowners and communities in the management of indigenous biodiversity. Ātiawa are supportive of Ātiawa acknowledge the collective efforts required to create meaningful improvements to te taiao.	Retain as notified.
S167 Taranaki Whānui	S167.0133	Policy IE.4: Recognising the roles and values of landowners and communities in the	Support in part	Taranaki Whānui supports the principle of Policy IE.4 and feel mana whenua as Treaty partners also have role in this policy and this should be referred to and enabled.	Retain as notified.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		management of indigenous biodiversity - non-regulatory			
S16 Kāpiti Coast District Council	S16.083	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Oppose	<p>Council opposes references to the WRGF and the attempt to give the document legal weight under the RMA as we express elsewhere in our submission. We seek deletion of such references from Policy 67 (and from throughout the plan change).</p> <p>We also oppose the inclusion and use of proposed definitions for high density development and medium density residential development. As expressed elsewhere in our submission, these definitions are not consistent with the NPS-UD and conflict with the Intensification Planning Instrument notified by Council.</p>	<p>Amend Policy 67 as follows:</p> <p>(a) implementing the New Zealand Urban Design Protocol and any urban design guidance that provides for best practice urban design and amenity outcomes, including for high density development and medium density residential development;</p> <p>(e) implementing the actions in the Future Development Strategy, or the regional and local strategic growth and/or development framework or strategy that describes where and how future urban development should occur in the region; and</p>
S30 Porirua City Council	S30.088	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Oppose	This policy does not make sense. It is a non-regulatory policy that requires a regulatory response.	Delete policy, or amend policy so that it provides clear and appropriate direction to plan users in line with objectives.
S34 Te Kaunihera o Te Awa	S34.097	Policy 67: Establishing and	Oppose	Council is concerned that the proposed non-regulatory method, appears to rely on a future regulatory process under clause (e). In addition, it is	Amend policy to provide clarity on where this should apply and include non-regulatory methods that could achieve an outcome rather than a regulatory approach and remove all references to

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Kairangi ki Uta, Upper Hutt City Council		maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory		inappropriate to rely on future plans and strategies where the content of these is unknown. References to an undeveloped strategy are ultra vires.	the yet to be developed Future Development Strategy.
S78 Beef + Lamb New Zealand Limited	S78.020	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Not Stated / Neutral	Accepts that the amendments to operative Policy 67 are required to give effect to the NPS-UD but neither supports nor opposes the provisions.	Retain as notified
S102 Te Tumu Paeroa Office of the Māori Trustee	S102.079	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Generally supports the non-regulatory policies in the 'Regional form, design and function' chapter.	Retain as notified.
S115 Hutt City Council	S115.090	Policy 67: Establishing and	Oppose in part	Oppose the inclusion of non-regulatory policies and methods that apply to territorial authorities.	Amend Policy 67 to make it clear it does not apply to city and district councils.

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
		maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory			
S128 Horticulture New Zealand	S128.054	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support in part	Policy 67 previously includes (g) safeguarding the productive capability of the rural area. A mention of highly productive land is valid in terms of establishing urban environments.	Add a new subclause: (g) recognising the values of highly productive land, including long-term for food production
S129 Waka Kotahi NZ Transport Agency	S129.029	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Supports the direction to implement the actions in the Future Development Strategy which describes where and how future urban development should occur. Well-functioning urban communities are reliant on transport choice to enable communities to operate at a scale that reduces VKT and lowers emissions.	Retain as notified.
S133 Muaūpoko	S133.075	Policy 67: Establishing and	Support in part	Supports these policies, however, requests amendment to ensure Muaūpoko is specifically recognised.	Specific recognition of Muaūpokoas having connection to Te-Whanganui-a-Tara and interest in these policies.

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Tribal Authority		maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory			
S137 Greater Wellington Regional Council (GWRC)	S137.037	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support in part	The qualities and characteristics of well-functioning urban environments articulated in Objective 22 applies to all urban areas in the Wellington Region. A sentence to this effect in the relevant policy explanations will assist with clarity.	Add a sentence to the Explanation section Well-functioning urban environments, as referred to in this policy and articulated in Objective 22, apply to all urban areas in the Wellington Region.
S137 Greater Wellington Regional Council (GWRC)	S137.055	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support in part	Amendments are required to improve readability, consistency and clarity. Add 'improve' into heading and wording for consistency with Policy 31.	Amend Policy 67 as shown below: Policy 67: Establishing, improving and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory To establish, improve and maintain and enhance the qualities and characteristics of well-functioning urban environments
S140 Wellington City	S140.091	Policy 67: Establishing and	Support	Support provided that the definitions of 'high density development' and 'medium density residential development' is amended as outlined below in the	Retain as notified provided the definitions of 'high density development' and 'medium density residential development' are

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
Council (WCC)		maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory		definition. With the current definitions the policy is too prescriptive and does not meet the intent of the NPS-UD.	amended.
S147 Wellington Fish and Game Council	S147.082	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.
S154 Investore Property Limited	S154.007	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Oppose in part	Policy 67 fails to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of infrastructure, and to enable more sustainable urban environments.	Amend Policy 67 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and create well-functioning and sustainable urban environments.
S155 Stride Investmen	S155.005	Policy 67: Establishing and	Oppose in part	Policy 67 fails to recognise that the NPS-UD seeks to focus intensification around centres and rapid transport nodes, to ensure efficient use of	Amend Policy 67 to give effect to the NPS-UD to recognise that intensification is to be focused around major centres and rapid transit nodes, to support the efficient use of infrastructure and

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Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
t Management Limited		maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory		infrastructure, and to enable more sustainable urban environments.	create well-functioning and sustainable urban environments.
S158 Kāinga Ora Homes and Communities	S158.031	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Supports the wording in this policy identifying urban design guidance as non-regulatory.	Retain as notified.
S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	S165.091	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support		Retain
S131 Ātiawa ki Whakaron	S131.0116	Policy 67: Establishing and	Support	Ātiawa approach to growth is grounded in and guided by our mātauranga, thus recognising the rangatiratanga of hapū and iwi,	Amend as follows: (a) implementing the New Zealand Urban Design Protocol and any urban design guidance that provides for best practice urban

SUBMISSION POINTS BY PLAN CHAPTER – Chapter 4.4: Non-regulatory policies

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
gotai Charitable Trust		maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory		applying the enduring wisdom of kaupapa Māori and enhancing the unique identity and culture of this place. Proactive initiatives are required to ensure that our unique history, identity and culture is respected and given expression in the region. The Design Guides are a key mechanism in giving effect to our kaupapa (values), huanga (vision) through our tikanga (approach) as expressed in Whakarongotai o te moana, Whakarongotai o te wā.	design and amenity outcomes, including mātauranga Māori and for high density development and medium density residential development;
S167 Taranaki Whānui	S167.0134	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support	Taranaki Whānui supports the amendments to Policy 67. We note subclause (d) and (f) and are keen to work in partnership with council on this.	Retain as notified.
S168 Rangitāne O Wairarapa Inc	S168.0181	Policy 67: Establishing and maintaining the qualities and characteristics of well-functioning urban environments - non-regulatory	Support in part	It is noted that this policy covers a range of matters, potentially not all of which non-regulatory - see clause d in particular. The inclusion of subclause (f) relating to partnering with mana whenua / tangata whenua to develop papakāinga design guidelines that are underpinned by Kaupapa Māori is supported. However, the clause only needs to refer to partnering (as this is the same as working together). The amendment of subclause (d) to substitute "encouraging" with "providing for" and the inserted reference to meeting "cultural" needs along with social and economic needs is supported. The explanation provided for Policy 67 does not address the range of matters covered in the policy. The Explanation should be expanded.	Amend clause (f) of the policy to read: "work together" and partnering with mana whenua / tangata whenua to prepare papakāinga design guidelines that are underpinned by kaupapa Māori." Provide a more comprehensive explanation of the policy.

